



August 3, 2020

Industrial Commission of Arizona
Medical Resource Office
800 W. Washington Street
Phoenix, AZ 85007

Dear Members of the Commission:

For nearly twenty years, Injured Workers Pharmacy (IWP) has been the industry leader in providing prescription services to the victims of workplace accidents. As a nationwide home delivery pharmacy, servicing workers' comp patients across the country and here in Arizona, we write today regarding the Amended Staff Proposal for the 2020/2021 Arizona Physicians' and Pharmaceutical Fee Schedule.

In 2019, when the ICA made the initial changes to the Fee Schedule, they made a conscious effort to limit the ability for prescribers to self-refer and obtain a financial benefit from the treatment of an injured worker. The changes made in the updated 2020/2021 proposal appear to only further that initiative. It is our view that the changes to the definitions of "Pharmacy accessible to the general public" and "Pharmacy not accessible to the general public" does not impact IWP's ability to continue business within the state. Although we are a workers' comp specialty pharmacy, we are not affiliated with any provider or institution that would limit injured workers' ability in Arizona to utilize IWP for their home delivery prescription needs.

The workers' comp system continues to operate effectively for insurers, providers, and injured workers across Arizona under the current guidelines, and even with the changes made under the current proposal. Within the regulatory environment the ICA has established insurers have the ability to set up networks to control their costs, while prescribers maintain the ability to make individual medical decisions for their patients, and injured workers retain the power to determine what meets their individual needs. The controls in place with the formulary and fee schedule ensure a level playing field for all providers and insurers and safeguard injured workers access to a variety of prescribers and pharmacies that meet their unique needs based. We encourage the ICA to continue to evaluate areas of improvement but urge you to maintain the system as is and trust in many of the regulations and safeguards already in place.

Thank you for your time and consideration. If you have any further questions, please do not hesitate to contact me at 978-770-8047 or djaffee@IWPharmacy.com.

Sincerely,
Danielle M. Jaffee, Esq.
Corporate Counsel, Director of Government Affairs