



July 29, 2020

Industrial Commission of Arizona
Medical Resource Office
P.O. Box 19070
Phoenix, AZ 85005

Re: Amended Staff Proposals and Request for Public Comment Regarding the 2020/2021
Physicians' and Pharmaceutical Fee Schedule

Dear Director Ashley and Members of the Commission:

I am writing today on behalf of Integrion Group, a local third party administrator handling Workers' Compensation claims across a variety of industries. The purpose of my letter is to express our full support for the proposed changes to the Arizona Fee Schedule. Of particular interest is the proposed change to the pharmaceutical fee schedule and new language related to a **"pharmacy not accessible to the general public."**

Similar to the data contained in Brian Allen's letter (the Mitchell letter), Integrion Group has seen a dramatic increase in pharmacy bills from out of state, mail order pharmacies since the changes to the 2019 fee schedule took effect. Approximately 25% of our clients' injured workers are using a **"pharmacy not accessible to the general public"** on an ongoing basis. Integrion's Pharmacy Benefit Manager (PBM), like most other PBMs, provides a mail order option to those injured workers who do not have convenient access to a local pharmacy, and the cost savings to the Workers' Compensation system are significantly lower than the mail order **"pharmacy not accessible to the general public"**.

Also similar to the Mitchell letter, when drugs are dispensed from out of state, out of network pharmacies, Integrion Group loses clinical data and a clear picture of all medications being prescribed to our injured workers. Our adjusters and claims managers are truly concerned about long-term use of opioid medication, because of the adverse effects on the lives of our injured workers. We rely heavily on our pharmacy benefit manager's data to monitor an injured worker's ongoing MED (morphine equivalent dosage) while being prescribed opioids. When an injured worker is referred by his/her prescriber to a **"pharmacy not accessible to the general public"**, the data does not flow through to our PBM. Passing the Amended Staff Proposal would restrict the use of a **"pharmacy not accessible to the general public"** and assist in our efforts to monitor the "opioid epidemic" within our injured worker population.

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We feel overuse of opioids is not only a public health crisis, but also leads to increased disability and cost associated with the claim. The injured worker, in most cases, suffers due to a decrease in the quality of life.

Integrion supports, in its entirety, the **Amended Staff Proposals and Request for Public Comment Regarding the 2020/2021 Physicians' and Pharmaceutical Fee Schedule. We are also in complete agreement with the suggested changes indicated in the Mitchell letter.**

Sincerely



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Arizona Operations Manager
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