



July 1, 2019

Jacqueline Kurth
The Industrial Commission of Arizona
Medical Resource Office
800 W. Washington St.
Phoenix, AZ 85007

Via email: mro@azica.gov

RE: Comments on Proposed Physicians and Pharmaceutical Fee Schedule

Thank you for the opportunity to comment on the proposed Arizona Physician's and Pharmaceutical Fee Schedule. Optum Workers' Compensation and Auto No-Fault (OWCA) appreciates the willingness of the Commission to work with stakeholders. At this time we offer general support as indicated below.

OWCA supports the reimbursement language for compounds and repackaged medications as found in section *III. General Guidelines For Billing And Reimbursement Of Prescription Medications*.

OWCA supports the reimbursement language for topical compounds as found in section *V. Billing and Reimbursement for Compound Medications*. However, we respectfully suggest the Commission review V.(F) regarding the days-supply language to better utilize the rule-making process to reduce or cap usage of topical compound medications to only a 30 days-supply per each prescription.

OWCA supports the continued use of Medi-Span® as the Publication for determining Average Wholesale Price ("AWP").

Thank you for this opportunity to comment. We offer our ongoing support as you continue to develop the fee schedule.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin C. Tribout", with a long horizontal line extending to the right.

Kevin C. Tribout
Executive Director of Government Affairs
Optum Workers' Compensation and Auto No-fault (OWCA)
Kevin.Tribout@optum.com