



May 11, 2017

VIA EMAIL: mro@azica.gov

Industrial Commission of Arizona
Attn: Chairman Schultz
800 West Washington Street
Phoenix, AZ 85007

RE: 2017/2018 Arizona Physicians' and Pharmaceutical Fee Schedule

Dear Chairman Schultz:

Express Scripts, Inc. appreciates the opportunity to submit comments regarding the proposed 2017/2018 Arizona Physicians' and Pharmaceutical Fee Schedule. Our goal is to ensure that any changes recommended address the issue and have the intended impact post adoption.

Express Scripts, Inc. is one of the largest pharmacy benefit management (PBM) companies in North America, providing PBM services to thousands of client groups, including managed-care organizations, insurance carriers, employers, third-party administrators, public sector, workers' compensation, and union-sponsored benefit plans. Express Scripts takes a strategic approach to workers' compensation, structuring customized client solutions around best-in-class core services, supported by advanced trend-management and clinical-review programs, to ensure safety for injured workers, while aggressively controlling costs.

Our concern is specific to Section 5. Payment to treating providers who participate in healthcare, preferred provider organization, outcome based network, or specialty networks.

Upon review, we find that the proposed recommendations could result in a delay of medical care, increased costs in the system and administrative burden. There is value in networks such as additional savings beyond fee schedule, documented protocols and communication plans between networks and payers that alleviate administration and avoid confusion for the injured worker as well as avoiding a delay in the initiation of medical treatment. For these reasons, we recommend removal of this language.

We appreciate the opportunity to provide feedback on the proposed 2017/2018 Arizona Physicians' and Pharmaceutical Fee Schedule. We look forward to continued participation and are willing to offer any assistance the Industrial Commission may find helpful.

Sincerely,

Kim Ehrlich
Workers' Compensation Compliance