



VALLEY SCHOOLS WORKERS'
COMPENSATION GROUP

VALLEY SCHOOLS
INSURANCE GROUP

VALLEY SCHOOLS
EMPLOYEE BENEFITS GROUP

September 11, 2018

Industrial Commission of Arizona
C/O Jacqueline Kurth, Manager
Medical Resource Office
800 West Washington St.
Phoenix, AZ 85007

RE: SB 1111 Reimbursement Guidelines for Physician-Dispensed Medications Public Hearing: August 23, 2018

To the Honorable Members of the Industrial Commission:

I am the Workers' Compensation Director For Valley Schools Workers' Compensation Group. We are a Public Entity Self-Insured in the State of Arizona. As such, our claims are paid with taxpayers dollars. We have a fiduciary responsibility to those taxpayers. We also have a responsibility to the injured workers' to ensure they receive prompt, excellent medical treatment appropriate for their diagnoses. I am not of the belief that physician dispensing of pharmaceuticals is in the best interests of the injured workers' or the taxpayers.

Plenty of evidence has been presented by other stakeholders demonstrating the higher cost of physicians dispensing medications so I will not address the cost issue except to say it is of grave concern to my company on behalf of the taxpayers.

Another area of grave concern is the lack of pharmaceutical knowledge possessed by physicians. An orthopedic surgeon is not well educated in medications for health conditions and illnesses, therefore, cannot be familiar with various drug interactions. A pharmacist is highly trained in this area and qualified to recognize negative drug interactions thus saving the injured workers' from what could potentially be serious health consequences and saving the taxpayers money.

In summary, we oppose physicians dispensing medications in their offices except on a very limited, controlled basis as suggested by other stakeholders. For example, first fill only with a limited formulary that does not include narcotics.

Sincerely,

Deborah S. Baker