



October 28, 2024

Industrial Commission of Idaho  
Attn: Kamerron Slay  
Delivered via email to [commissionsecretary@iic.idaho.gov](mailto:commissionsecretary@iic.idaho.gov)

Dear members of the Industrial Commission:

Enlyte Pharmacy Solutions is one of the nation's leading providers of pharmacy management services in the workers' compensation systems in all 50 states. We appreciate the opportunity to comment on the Industrial Commission workers' compensation rules. Our comments are focused on the pharmaceutical reimbursement section. We are making recommendations to provide some clarity in areas of potential abuse or over-billing that we see across the country. Our suggestions are in bold, underlined, purple text below.

**04. Acceptable Charges For Medicine Provided By Pharmacies.** The following standards shall be used to determine the acceptable charge for medicine provided by pharmacies. (3-23-22)

**a. Brand/Trade Name Medicine.** The standard for determining the acceptable charge for brand/trade name medicine shall be the AWP, plus a five dollar (\$5) dispensing fee. (3-23-22)

**b. Generic Medicine.** The standard for determining the acceptable charge for generic medicine shall be the AWP, plus an eight dollar (\$8) dispensing fee. (3-23-22)

**c. Compound Medicine.** The standard for determining the acceptable charge for compound medicine shall be the lesser of the sum of the AWP for each drug included in the compound medicine, or the maximum reimbursement for topical medicines as listed in paragraph (d), plus a five dollar (\$5) dispensing fee and a two dollar (\$2) compounding fee. All components of the compound medicine shall be identified by their original manufacturer's NDC when submitted for reimbursement. Payors may withhold reimbursement until the original manufacturer's NDC assigned to each component of the compound medicine is provided by the Pharmacy. Components of a compound medicine without an NDC may require medical necessity confirmation by the treating physician prior to reimbursement. (3-23-22)

**d. Topical Medicines.** The maximum reimbursement for prescription topical medicines, either prepackaged or compounded, will be \$240 for a 30-day supply, pro-rated based on the number of days supply dispensed.

**e. Prescribed Over-the Counter Medicine.** The standard for determining the acceptable charge for prescribed over-the-counter medicine filled by a Pharmacy shall be the reasonable charge plus a two dollar (\$2) dispensing fee. (3-23-22)

**f. Repackaged medicines.** Reimbursement for repackaged medications shall be based on the average wholesale price as determined by the National Drug Code (NDC) or of the original manufacturer product used in the repackaging. Both the repackaged NDC and the original manufacturer product shall be indicated when submitted for reimbursement. Payors may

withhold reimbursement until the original manufacturer's NDC for the repackaged medicine is provided by the dispensing provider.

Thank you for your consideration of our suggestions. If you have questions or desire additional information, please contact me at [Brian.Allen@enlyte.com](mailto:Brian.Allen@enlyte.com) or at 801-661-2922.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Allen", written over a light blue circular stamp.

Brian Allen  
Vice President Government Affairs  
Enlyte Pharmacy Solutions