



Liberty Mutual Insurance

WC Product
157 Berkeley Street
Boston, MA 02116
(617) 654-4167

March 16, 2018

Kendall M. Bourdon
1233 Mail Service Center
Raleigh, NC 27699-1233

RE: Rules for the utilization of opioids, related prescriptions and pain management treatment in workers compensation claims

Dear Kendall,

Liberty Mutual Insurance appreciates the opportunity to provide feedback on the rules proposed in Subchapter 10M – Rules for the utilization of opioids, related prescriptions and pain management treatment in workers compensation claims. Liberty Mutual Insurance does support the rules however, we have the following questions to help us better prepare for their adoption as well as to ensure we appropriately care for our injured workers.

1. Is formal utilization review required for the pre-authorization process or for instances where the prescriber is prescribing outside the recommended guidelines?
2. If no, can anyone within the Carrier/Insurer organization perform the pre-authorization process?
3. What if the determination is to not allow the requested prescription? Does Physician review need to be entertained to make this determination or is the Carrier/Insurer able to make this determination?
4. How certain is the State that the rules will be adopted for 5/1/18?
5. Will the state be conducted any training to prescribers?

We truly appreciate you taking the time to review our questions and provide comment. Thank you.

Sincerely,

Laura MacArthur
Claims Standards Manager, WC Product
Liberty Mutual Insurance



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