

## Statement explaining why a revised Rural Area Flexibility Analysis is not required

A revised Rural Area Flexibility Analysis is not required because the changes made to the last published rule do not necessitate revision to the previously published document. The changes to the text are not substantial, do not change the meaning of any provision and therefore do not change any statements in the document.

Specifically the changes are to: 1) conform section 324.2 subdivision (2) to the Medical Treatment Guidelines requirement that Spinal Cord Pain Stimulators and Intrathecal Drug Delivery (Pain Pumps) have been added to the list of procedures that require pre-authorization; 2) add a clarifying sentence to section F.1.c of the Non-Acute Pain Medical Treatment Guidelines noting that brand-name drugs are generally not recommended.