

Workers' Compensation Information Systems (WCIS)	RULEMAKING COMMENTS 45 DAY COMMENT PERIOD	NAME OF PERSON/ AFFILIATION	RESPONSE	ACTION
9701(n)(2)	Commenter inquires if the date for the Release 2.0 guide should be February 1, 2014 since that is now the latest version of the guide.	Kathleen Garrety Sr. Business Analyst Liberty Mutual July 14, 2014 Written Comment	Agree	Change the IAIABC Implementation Guide version date to February 1, 2014 under regulation 9701.
9702(e)(3)	Commenter inquires if the date for the Release 2.0 guide should be February 1, 2014 since that is now the latest version of the guide.	Kathleen Garrety Sr. Business Analyst Liberty Mutual July 14, 2014 Written Comment	Agree	Change the IAIABC Implementation Guide version date to February 1, 2014 under regulation 9702.
CA EDI Implementation Guide – CA Medical Data Elements by Source Table – Page 36	<p>Commenter references DN 592 – Rendering Line Provider National Provider ID.</p> <p>Commenter notes that there is only a reference to a Payer having the information on this field. Commenter opines that there should be a reference to 24j on the CMS-1500. Commenter states that it is the payer's responsibility to obtain the Rendering Line Provider NPI rather than having the provider enter it on a paper bill or through an electronic bill.</p>	Kathleen Garrety Sr. Business Analyst Liberty Mutual July 14, 2014 Written Comment	Agree	On the California Medical Element by Source table add Field 24J under CMS-1500 for DN 0592.
CA EDI Implementation Guide – Lump	Commenter references the following current language:	Kathleen Garrety Sr. Business Analyst Liberty Mutual	Agree	For lump sum payments DN0512 Date Insurer Paid Bill

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Sum Bundled Lien Payment - Page 70	<p>For medical lien lump sum payments or settlements, use the date final payment was made on DN 0512 Date Insurer Paid Bill.</p> <p>For medical lien lump sum payments or settlements, use the date on the first medical bill received on DN0512 Date Insurer Paid Bill.</p> <p>Commenter opines that it is not clear which one of the above should be used for DN0512. Commenter states that these dates seem very different for indicating the date the insurer paid the bill on the lien lump sum.</p>	July 14, 2014 Written Comment		should be the date of the final payment.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 33	<p>Commenter references DN 0015 – Claim Administrator Claim Number.</p> <p>Commenter recommends adding 17.</p>	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, add 17 to DN 0015 – Claims Administrator Claim number.
CA EDI Implementation Guide - CA Medical Data	<p>Commenter references DN 0042 – Employee Social Security Number.</p> <p>Commenter recommends adding 12.</p>	Lee Ann C. Stember President NCPDP July 14, 2014	Agree	On California Medical Data Elements by Source Table, under the

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Elements by Source Table – Page 33		Written Comment		NCPDP column, add 12 to DN 0042 – Employee Social Security Number.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 34	<p>Commenter references DN 0527 – Prescription Bill Date.</p> <p>Commenter recommends changing 66 to 65.</p> <p>Commenter states that the data element name should be prescription date rather than prescription bill date, per IAIABC Release 2.0.</p>	<p>Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment</p>	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, change 66 to 65 for DN 0527 – Prescription Bill Date.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 35	<p>Commenter references DN 0528 – Billing Provider Last/Group Name.</p> <p>Commenter recommends changing 34 to 51.</p>	<p>Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment</p>	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, change 34 to 51 for DN 0528 – Billing Provider Last/Group Name.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table –	<p>Commenter references DN 0538 – Billing Provider Primary Address.</p> <p>Commenter recommends changing 35 to 52.</p>	<p>Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment</p>	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, change 35 to 52 for

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Page 35				DN 0538 – Billing Provider Primary Address.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 35	Commenter references DN 0540 – Billing Provider City. Commenter recommends changing 36 to 53.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, change 36 to 53 for DN 0540 – Billing Provider City.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 35	Commenter references DN 0541 – Billing Provider City. Commenter recommends changing 37 to 54.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, change 37 to 54 for DN 0541 – Billing Provider City.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 35	Commenter references DN 0542 – Billing Provider Postal Code. Commenter recommends changing 38 to 55.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, change 38 to 55 for DN 0542 – Billing Provider Postal Code.
CA EDI Implementation	Commenter references DN 0563 – Drug Name.	Lee Ann C. Stember President	Agree	On California Medical Data

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Guide - CA Medical Data Elements by Source Table – Page 35	Commenter recommends adding 76 (single drug) and 94 (compound drug).	NCPDP July 14, 2014 Written Comment		Elements by Source Table, under the NCPDP column, add 76 (single drug) and 94 (compound drug) for DN 0563 – Drug Name.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 36	Commenter references DN 0571 – Drugs/Supplies Number of Days. Commenter recommends changing 71 to 72.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, change 71 to 72 for DN 0571 – Drugs/Supplies Number of Days.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 36	Commenter references DN 0572 – Drugs/Supplies Billed Amount. Commenter recommends adding 98 (compound drug) and 102 (single drug).	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, for DN 0572 – Drugs/Supplies Billed Amount add 102 (single drug) and 98 (compound drug).
CA EDI Implementation Guide - CA	Commenter references DN 0604 – Prescription Line Date.	Lee Ann C. Stember President NCPDP	Agree	On California Medical Data Elements by Source

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Medical Data Elements by Source Table – Page 36	Commenter recommends changing 66 to 65 or removing the requirement for reporting this DN. Commenter states that the NCPDP WC/PC UCF form allows billing of only one prescription; therefore there is no line date.	July 14, 2014 Written Comment		Table, under the NCPDP column, change 66 to 65 for DN 0604 – Prescription Line.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 36	Commenter references DN 0605 – Service Line Date(s). Commenter recommends adding 66.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, add 66 for DN 0605 – Service Line Date(s).
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 36	Commenter references DN 0616 – Insurer Postal Code. Commenter recommends adding 22.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, for DN 0616 – Insurer Postal Code, add 22.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 36	Commenter references DN 0629 – Billing Provider FEIN. Commenter recommends adding 49.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, add 49 for DN 0629 – Billing Provider FEIN.
CA EDI	Commenter references DN 0630 –	Lee Ann C. Stember	Agree	On California

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Implementation Guide - CA Medical Data Elements by Source Table – Page 36	Billing Provider State License Number. Commenter recommends adding 49.	President NCPDP July 14, 2014 Written Comment		Medical Data Elements by Source Table, under the NCPDP column, for DN 0630 – Billing Provider State License Number, add 49.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 36	Commenter references DN 0634 – Billing Provider National Provider ID. Commenter recommends adding 49.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, for DN 0634– Billing Provider National Provider ID add 49.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 36	Commenter references DN 0638– Rendering Bill Provider Last/Group Name. Commenter recommends adding 34.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, for DN 0638– Rendering Bill Provider Last/Group Name, add 34.
CA EDI Implementation Guide - CA Medical Data	Commenter references DN 0643 – Rendering Bill Provider State License Number.	Lee Ann C. Stember President NCPDP July 14, 2014	Agree	On California Medical Data Elements by Source Table, under the

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Elements by Source Table – Page 36	Commenter recommends adding 32.	Written Comment		NCPDP column, for DN 0643 – Rendering Bill Provider State License Number, add 32.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 36	Commenter references DN 0647 – Rendering Bill Provider National Provider ID. Commenter recommends adding 32.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP Column, for DN 0647 – Rendering Bill Provider National Provider ID, add 32.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 37	Commenter references DN 0690 – Referring Provider Last/Group Name. Commenter recommends adding 42.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, for DN 0690 – Referring Provider Last/Group Name, add 42.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table –	Commenter references DN 0691 – Referring Provider First Name. Commenter recommends adding 43.	Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, for DN 0691 – Referring

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Page 37				Provider First Name, add 43.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 37	<p>Commenter references DN 0699 – Referring Provider National Provider ID.</p> <p>Commenter recommends adding 40.</p>	<p>Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment</p>	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, for DN 0699 – Referring Provider National Provider ID, add 40.
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Page 37	<p>Commenter references DN 0721 – NDC Billed Code.</p> <p>Commenter recommends adding 95 for compound medications.</p>	<p>Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment</p>	Agree	On California Medical Data Elements by Source Table, under the NCPDP column, for DN 0721 – NDC Billed Code, add 95 for compound medication.
CA EDI Implementation Guide – Medical Data Element Requirement Table – Page 41	<p>Commenter References the Bill Type column.</p> <p>Commenter recommends changing the “All” in the Bill Type Column to remove RX since these DNs are not applicable to RX bills submitted on the NCPDP WC/PC UCF.</p> <p>Commenter requests doing so for the following DNs:</p>	<p>Lee Ann C. Stember President NCPDP July 14, 2014 Written Comment</p>	<p>Agree to make the proposed changes for DN 587, 589, 592, 651, 667, 671.</p> <p>Disagree to change the requirement for DN 678, 680, 682, 684, 685, 686, 687, 688, and 689.</p> <p>The Facility information</p>	Change the requirement for the below listed data elements to exclude pharmacy bills: 587, 589, 592, 651, 667, 671

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	587; 589; 592; 651; 667; 671; 678; 680; 682; 684; 685; 686; 687; 688; 689.		collected in DN 678; 680; 682; 684; 685; 686; 687; 688; 689 is required only when the service is provided when the service location is different than the billing location. Removing the requirement for these DNs will make it impossible to know the location where the service is provided when the billing information is different than the billing location information.	
9701(d)	<p>Commenter recommends the following revised language:</p> <p>California Jurisdiction Code. A California-specific code that identifies a medical procedure, service, or product that is not identified by a current HCPCS code. California Jurisdiction Codes are either set forth and/or incorporated by reference in California Code of Regulations, title 8, section 9795, regarding reasonable fees for medical-legal expenses, <u>section 9789.11, regarding fees for physician services rendered on or after July 1, 2004 and</u></p>	<p>Stacy Jones Senior Research Associate California Workers' Compensation Institute (CWCI) July 14, 2014 Written Comment</p>	Agreed.	<p>Add the language "section 9789.11, regarding fees for physician services on or after July 1, 2004 and before January 1, 2014," between the words "expenses," and "sections 9789.12.1-9789.19," as suggested.</p>

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	<p>before January 1, 2014, sections 9789.12.1-9789.19, regarding fees for physician services rendered on or after January 1, 2014, or in California EDI Implementation Guide for Medical Bill Payment, Release 2.0, Section IX, subsections entitled “Lump sum bundled lien bill payment” and “Lump sum lien bills data elements,” regarding medical lien lump sum payments or settlements. The California EDI Implementation Guide for Medical Bill Payment, Release 2.0 is incorporated by reference in subdivision (c)(2).</p> <p>Commenter states that implementation of changes to the California Official Medical Fee Schedule in January of 2014 included significant changes to service codes required for correct billing. Commenter opines that removal of reference to the California jurisdiction codes that were in effect between July 1, 2004 and January 1, 2014 may result in an inability to report services that were rendered during that time frame and billed using a jurisdiction code. Commenter states that restoring “section 9789.11, regarding fees for physician</p>			
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	services rendered on or after July 1, 2004” and adding “and before January 1, 2014” will clarify that jurisdiction codes then in effect for billing are reportable under §9701(d).			
CA EDI Implementation Guide – Medical Data Element Requirement Table – Page 41	<p>Commenter recommends the addition of the following statement under the title “Medical Date Element Requirement Table”:</p> <p><u>(Does not apply to medical lien lump sum payments or settlements.)</u></p> <p>Commenter opines that replacing the parenthetical notation “(Does not apply to medical lien lump sum payments or settlements)” in the headings of the Medical Data Element Requirement Table is necessary because otherwise lump sum lien payments will be subject to the detailed data requirements. Commenter states that the detailed data requirements are not applicable to lump sum payments. Commenter notes that the section on “Lump sum bundled lien payment” that begins on page 70 specifies the data elements that are required in the event of lien</p>	<p>Stacy Jones Senior Research Associate California Workers' Compensation Institute (CWCI) July 14, 2014 Written Comment</p>	<p>Agree to add the proposed title on the Medical Data Element Requirement Table.</p>	<p>Add the following language to the Medical Data Element Requirement Table:</p> <p><u>(Does not apply to medical lien lump sum payments or settlements.)</u></p>

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	<p>settlements or payments. When a lien settlement covers multiple bills, it is often not possible to capture the aggregated amount(s) previously paid. Lump sum lien settlements are normally not processed as replacement bills for previously reported original bills that may have been partially paid or disallowed. A settlement is often not limited to bills on which liens have been filed, and a settlement may cover multiple claims.</p> <p>Commenter states that the Medical Data Element Requirement table identifies the reporting requirements for listed data elements, and the California Medical Data Elements by Source table provides the data source and field name for an originating billing form. Commenter opines that data elements that are identified as mandatory conditional (MC) or mandatory (M) in the Medical Data Element Requirement table should appear in the California Medical Data Elements by Source table with the appropriate source indicated.</p>		<p>The source for all data elements that California collects is shown on the California Medical Data Elements by Source table.</p>	
CA EDI Implementation	Commenter references DN 0505 – Bill Frequency Type Code.	Stacy Jones Senior Research	Agree	The California Medical Data

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<p>Guide – CA Medical Data Elements by Source Table – Page 34</p>	<p>Commenter recommends removing field 22 of CMS-1500 form as a source for this data element.</p> <p>Commenter notes that this code is defined as a mandatory data element for institutional bills. The California Medical Data Elements by Source table shows field 22 on the CMS-1500 form as an additional source for the data element. Commenter opines that if the billing frequency code associated with resubmitted CMS-1500 forms is not reportable in the 837 file, field 22 should be removed from the California Medical Data Elements by Source table. If the intent is to require it for resubmitted CMS-1500 bills, commenter recommends that the information be added to the Medical Data Element Requirement Table as Mandatory Conditional (MC) for professional bill types.</p>	<p>Associate California Workers' Compensation Institute (CWCI) July 14, 2014 Written Comment</p>		<p>Element by Source table will be corrected by removing the 22 under CMS-1500 for DN 0505.</p>
<p>CA EDI Implementation Guide – CA Medical Data Elements by</p>	<p>Commenter references DN 0572 – Drugs/Supplies Billed Amount.</p> <p>Commenter recommends adding this source information to the California</p>	<p>Stacy Jones Senior Research Associate California Workers' Compensation</p>	<p>Disagree because the NCPDP field equivalent for DN 0572 Drugs/Supplies Number of Days is 98 or 102.</p>	<p>On the California Medical Data Elements by Source table under the NCPDP column add</p>

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Source Table – Page 36	<p>Medical Data Elements by Source Table.</p> <p>Commenter notes that the California Medical Data Elements by Source table does not identify the source for DN0572. Commenter opines that adding field 100 of the NCPDP form as the source for the data element, which corresponds to the data requirement in the California Division of Workers' Compensation Medical Billing and Payment Guide 2011 Version 1.1, will ensure that all submitters are reporting the same information.</p>	Institute (CWCI) July 14, 2014 Written Comment		98 and 102 for DN 0572 Drugs/Supplies Number of Days.
CA EDI Implementation Guide – CA Medical Data Elements by Source Table – Page 36	<p>Commenter references DN 0593 – Rendering Line Provider Postal Code.</p> <p>Commenter recommends the removal of this code from the California Medical Data Elements by Source table.</p> <p>Commenter notes that this code is listed in the California Medical Data Elements by Source table, but it is not listed in the Medical Data Element Requirement Table. DN0593 is not</p>	Stacy Jones Senior Research Associate California Workers' Compensation Institute (CWCI) July 14, 2014 Written Comment	This had a strikethrough on the guide posted on the forum and was left in by mistake and will be removed.	DN0593 Rendering Line Provider Postal Code is removed from California Medical Data Element by Source table.

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	<p>listed as a data element in the IAIABC Workers' Compensation Medical Bill Data Reporting Implementation Guide Release 2.0, nor is the data associated with DN0593, "rendering line provider postal code" billed or captured at the line level during bill processing. Commenter opines that removal of the data element from the California Medical Data Elements by Source table will clarify that a payer is not a source for the data element.</p>			
<p>CA EDI Implementation Guide – CA Medical Data Elements Requirement Table – Page 44</p>	<p>Commenter references DN 0551 – Procedure Description.</p> <p>Commenter recommends removing the mandatory conditional (MC) requirement which requires the payer to provide a free-form description for an unlisted procedure code.</p> <p>Commenter states that unlisted codes have generic descriptions that have been assigned to them by the governing body (American Medical Association, American Dental Association, etc.) and these descriptors may not be changed. Commenter opines that it is not</p>	<p>Stacy Jones Senior Research Associate California Workers' Compensation Institute (CWCI) July 14, 2014 Written Comment</p>	<p>The requirement for DN 0551 Procedure Description will be changed to AA – meaning if item applicable/available.</p>	<p>Change the requirement for DN0551 from MC to AA</p>

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	feasible for a payer to manually replace the generic description associated with an unlisted code with a description that is obtained from another document. Commenter states that data entered in free-form text is unreliable and unsuitable for data analysis since the text will lack consistency.			
CA EDI Implementation Guide - CA Medical Data Elements by Source Table – Pages 36 and 37	<p>Commenter requests clarification of the data that is found in field 17 of the CMS-1500 form in the California Medical Data Elements by Source table. Commenter recommends CMS-1500 source information for the following data elements:</p> <ul style="list-style-type: none"> ➤ DN0658 – Supervising Provider Last/Group Name ➤ DN0659 – Supervising Provider First Name ➤ DN0690 – Referring Provider Last/Group Name ➤ DN0691 – Referring Provider First Name <p>Commenter notes that the California Medical Data Elements by Source table shows CMS-1500 form field 17 as the source for DN0658 – Supervising</p>	Stacy Jones Senior Research Associate California Workers' Compensation Institute (CWCI) July 14, 2014 Written Comment		Source for DN0658 and DN0659 is already shown on the California Medical Data Element by Source table. The source for DN 0690 and DN0691 will be added as 17 on the California Medical Data Element by Source table.

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	<p>Provider Last/Group Name – and for DN0659 – Supervising Provider First Name. The California Medical Data Elements by Source table shows CMS-1500 form field 17b as the source for DN0667 – Supervising Provider National Provider ID.</p> <p>The CMS-1500 form uses fields 17 and 17b to capture information for a referring provider, supervising provider or ordering provider which is documented in the California Division of Workers' Compensation Medical Billing and Payment Guide Version 1.2. There is a qualifier that identifies the role of the provider who is named in field 17 (DN – Referring Provider, DK – Ordering Provider and DQ – Supervising Provider).</p> <p>Commenter opines that without clarifying information, inaccurate information will be reported concerning a physician's role related to the billed service(s).</p>			
CA EDI Implementation Guide – Lump sum	Commenter recommends the following revised language to paragraph one and two and five of this	Stacy Jones Senior Research Associate	Agree	Make the recommended language change.

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<p>bundled lien bill payment – Page 70</p>	<p>section:</p> <p>California law allows the filing of a lien against any sum to be paid as compensation for the “reasonable expense incurred by or on behalf of the injured employee, as provided by Article 2 (commencing with Section 4600), except those disputes subject to independent medical review or independent bill review.” for medical treatment (see Labor Code section 4903(b) and 4903.1). Reportable lump sum medical liens originating from medical bills are filed on DWC Workers’/WCAB Form 6. Theis medical lien form is located at http://www.dir.ca.gov/dwc/FORMS/EAMS%20Forms/ADJ/DWCForm6.pdf.</p> <p>For the complete list of data elements required in a reportable lump sum medical lien, see the IAIABC Workers’ Compensation Medical Bill Data Reporting Implementation Guide Release 2.0, February 1, 2014, section 1.3.1, page 1.13.</p>	<p>California Workers’ Compensation Institute (CWCI) July 14, 2014 Written Comment</p>		
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	<p>For medical lien lump sum payments or settlements, use the date final payment was made on DN 0512 – Date Insurer Paid Bill.</p> <p>For medical lien lump sum payments or settlements, use the date on the first medical bill received on DN0512 Date Insurer Paid Bill.</p> <p>Data elements required to be reported in a Lump Sum <u>payment or settlement of a lien</u> .Lien bills are listed below.</p> <p>Commenter opines that information describing the date used for DN0512 (Date Insurer Paid Bill) on page 70 of the California Electronic Data Interchange (EDI) Implementation Guide for Medical Bill Payment Records Version 2.0 is confusing and contradictory. One sentence states “For medical lien lump sum payments or settlements, use the date the final payment [emphasis added] was made on DN 0512 Date Insurer Paid Bill.” This sentence is followed by “For medical lien lump sum payments or settlement, use the date on the first</p>			
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	<p>medical bill received [emphasis added] on DN0512 Date Insurer Paid Bill.” The final payment date is the date that needs to be reported when reporting medical lien lump sum payments or settlements.</p> <p>In the last paragraph, the data elements “listed below” apply when a payment or settlement involves a lien.</p>			
<p>CA EDI Implementation Guide – Lump sum bundled lien bill payment – Data Element Chart – Page 72 and Medical Data Element</p>	<p>Commenter recommends the addition of the word “single” before “medical bill” in the description provided under the “Business Condition/Mandatory Trigger” column.</p> <p>Commenter notes that the Business Condition/Mandatory Trigger language in the Medical Data Element Requirement Table states “Required for lien bills, when reporting bill adjudication actions related to a medical bill that has previously been reported” differs from the language in the IAIABC Workers’ Compensation Medical Bill Data Reporting Implementation Guide Release 2.0 (“Prior Actual Amount Paid- will be populated with the total amount the</p>	<p>Stacy Jones Senior Research Associate California Workers’ Compensation Institute (CWCI) July 14, 2014 Written Comment</p>	<p>Disagree to add the word “single’ as proposed because DN0760 Prior Actual Amount Paid will be populated with the total amount the insurer or claims administrator previously paid for all medical bills contained in the aggregate or summary.</p> <p>Agree to correct the trigger language for DNs 0760 and 0761 in the Medical Data Element Requirement table to conform to the IAIABC usage of the data element.</p>	<p>Change the requirement for DN0760 Procedure Description from MC to AA on the Medical Data Element Requirement table.</p> <p>Change trigger language on the Medical Data Element Requirement Table for DN0760 and DN0761 as follows</p> <p><u>DN0760</u> Required when reporting total</p>

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	<p>insurer or claim administrator previously paid for all medical bills contained in the aggregate or summary record"). Commenter opines that adding "single" will clarify that the data element applies to a lien payment for a single medical bill rather than a lien payment for multiple bills.</p> <p>Commenter states that in the event that the lien settlement covers multiple bills, it is often not possible to capture the aggregated amount(s) previously paid. Lump sum lien settlements are normally not processed as replacement bills for previously reported original bills that may have been partially paid or disallowed.</p>			<p>amount the insurer or claims administrator previously paid for the medical bill prior to receipt of the request for reconsideration or appeal.</p> <p><u>DN0761</u> Required when reporting line-level adjudication actions related to a previously paid bill (prior to receipt of the request for reconsideration or appeal.)</p>
General Comment	<p>Commenter requested that the DWC conduct research to establish the number of employees that suffer concussions, chemical exposure, brain injuries, brain injuries that result in amnesia, the amount of time that it takes to resolve workers' compensation cases, and the number of injured workers' who commit suicide while their workers'</p>	<p>Meleah Hall Special Education Teacher July 14, 2014 Oral Comment</p>	<p>The comment does not address the regulation amendments proposed in the 45-day comment period.</p>	<p>None.</p>

Workers' Compensation Information Systems (WCIS)	RULEMAKING COMMENTS 45 DAY COMMENT PERIOD	NAME OF PERSON/ AFFILIATION	RESPONSE	ACTION
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	<p>compensation claims are pending. Commenter is especially concerned about teacher and paraprofessionals and the types of work-related injuries they incur. Commenter would also like information regarding racial inequalities in outcomes in workers' compensation cases.</p>			
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