



California Workers' Compensation Institute
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May 14, 2021

VIA E-MAIL – dwcrules@dir.ca.gov

Maureen Gray, Regulations Coordinator
Division of Workers' Compensation, Legal Unit
P.O. Box 420603
San Francisco, CA 94142

Re: Proposed Updates to the Medical Treatment Utilization Schedule (MTUS)

Dear Ms. Gray:

These comments on proposed updates to the Medical Treatment Utilization Schedule (MTUS) are presented on behalf of members of the California Workers' Compensation Institute (the Institute). Institute members include insurers writing 80% of California's workers' compensation premium, and self-insured employers with \$87B of annual payroll (33.6% of the state's total annual self-insured payroll).

Insurer members of the Institute include AIG, Allianz Global Corporate and Specialty, AmTrust North America, AXA XL Insurance, Berkshire Hathaway, CHUBB, CNA, CompWest, CopperPoint Insurance Companies, Crum & Forster, EMPLOYERS, Everest Insurance, GUARD Insurance Companies, The Hanover Insurance Company, The Hartford, ICW Group, Liberty Mutual Insurance, North American Casualty Company, Preferred Employers Insurance, Republic Indemnity Company of America, Sentry Insurance, State Compensation Insurance Fund, Travelers, WCF National Insurance, Zenith Insurance, and Zürich North America.

Self-insured employer members include Albertsons/Safeway, BETA Healthcare Group, California Joint Powers Insurance Authority, California State University Risk Management Authority, Chevron Corporation, City and County of San Francisco, City of Los Angeles, City of Pasadena, Costco Wholesale, County of Los Angeles, County of San Bernardino Risk Management, County of Santa Clara Risk Management, Dignity Health, Disneyland Resort, East Bay Municipal Utility District, Grimmway Farms, Kaiser Permanente, North Bay Schools Insurance Authority, Pacific Gas & Electric Company, Schools Insurance Authority, San Diego Gas and Electric, Shasta County Risk Management, Shasta-Trinity Schools Insurance Group, Southern California Edison, Southern California Gas, Special District Risk Management Authority, Sutter Health, United Airlines, and the University of California.

The Division is proposing updates to the Medical Treatment Utilization Schedule (MTUS) that updates §9792.24.7. These changes incorporate by reference the latest evidence-based published guidelines from the American College of Occupational and Environmental Medicine (ACOEM) for the Coronavirus (COVID-19) Guideline (ACOEM March 29, 2021).

The Institute supports updates to the Medical Treatment Utilization Schedule, ensuring that treatment for injured workers remains governed by evidence-based guidelines that are the most current available from ACOEM.

Thank you for the opportunity to comment, and please contact us if additional information would be helpful.

Sincerely,
Jackie Secia

Jackie Secia
Claims and Medical Director

JS/pm

cc: George Parisotto, DWC Administrative Director
John G. Cortes, DIR Counsel
CWCI Claims Committee
CWCI Medical Care Committee
CWCI Legal Committee
CWCI Regular Members
CWCI Associate Members