



California Workers' Compensation Institute  
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VIA E-MAIL: [dwcrules@dir.ca.gov](mailto:dwcrules@dir.ca.gov)

October 26, 2015

Maureen Gray, Regulations Coordinator  
Department of Industrial Relations  
Division of Workers' Compensation, Legal Unit  
Post Office Box 420603  
San Francisco, CA 94142

**Re: 1<sup>st</sup> Forum Comments on Draft Guidelines for Occupational/Work-Related  
Asthma, Interstitial Lung Disease**

Dear Ms. Gray:

These first Forum comments regarding draft Guidelines for Occupational/Work-Related Asthma, Interstitial Lung Disease are presented on behalf of the members of the California Workers' Compensation Institute (the Institute). Institute members include insurers writing 72% of California's workers' compensation premium, and self-insured employers with \$46B of annual payroll (28% of the state's total annual self-insured payroll).

Insurer members of the Institute include ACE Group, AIG, Alaska National Insurance Company, Allianz/Fireman's Fund Insurance Company, AmTrust North America, Chubb Group, CNA, CompWest Insurance Company, Crum & Forster, Employers, Everest National Insurance Company, The Hartford, ICW Group, Liberty Mutual Insurance, Pacific Compensation Insurance Company, Preferred Employers Group, Republic Indemnity Company of America, Sentry Insurance, State Compensation Insurance Fund, State Farm Insurance Companies, Travelers, XL America, Zenith Insurance Company, and Zurich North America.

Self-insured employer members include Adventist Health, California State University Risk Management Authority, Chevron Corporation, City and County of San Francisco, City of Santa Ana, City of Torrance, Contra Costa County Schools Insurance Group, Costco Wholesale, County of Alameda, County of San Bernardino Risk Management, County of Santa Clara, Dignity Health, Foster Farms, Grimmway Enterprises Inc., Kaiser Permanente, Marriott International, Inc., Pacific Gas & Electric Company, Safeway, Inc., Schools Insurance Authority, Sempra Energy, Shasta County Risk Management, Shasta-Trinity Schools Insurance Group; Southern California Edison, Special District Risk Management Authority, Sutter Health, University of California, and The Walt Disney Company.

**Comment**

The California Workers' Compensation Institute supports the addition of guidelines for Occupational/Work Related Asthma and Occupational Interstitial Lung Disease as drafted in Sections 9792.23.10 and 9792.23.11, adopting and incorporating by reference into the MTUS the Occupational/Work Related Asthma Guideline and the Occupational Interstitial Lung Disease Guideline from the ACOEM Practice Guidelines of June 26, 2015. The Institute believes that the Guidelines will benefit injured employees by providing treating, evaluating and reviewing physicians with guidance on the most effective treatment for these difficult occupational conditions, based on the best available medical evidence.

Sincerely,

Brenda Ramirez  
Claims and Medical Director

BR/pm

cc: Christine Baker, DIR Director  
Destie Overpeck, DWC Administrative Director  
Dr. Rupali Das, DWC Executive Medical Director  
CWCI Claims Committee  
CWCI Medical Care Committee  
CWCI Legal Committee  
CWCI Regular Members  
CWCI Associate Members