

WCIS REGULATIONS	RULEMAKING COMMENTS 2nd 15 DAY COMMENT PERIOD	NAME OF PERSON/ AFFILIATION	RESPONSE	ACTION
9701-9702	The Division will not know what medical information will be available for reporting to WCIS until the medical billing standards are finalized and approved by the Office of Administrative Law. The Institute therefore continues to recommend that the Division delay further consideration of changes to the WCIS system until the medical billing standards are finalized.	Brenda Ramirez Claims and Medical Director California Workers' Compensation Institute Written Comment August 26, 2010.	The Division expects that the medical billing standards, as well as new physician reporting regulations, will be implemented by the effective date of the WCIS regulations. Regardless, the WCIS does not require the submission of data elements that are currently not required to be given by the health care provider to the claims administrator.	None.
9701-9702 .	State Fund has reviewed the proposed regulation changes and the proposed modifications to the California EDI Implementation Guide for First and Subsequent Reports of Injury (Version 3.0) and the California EDI Implementation Guide for Medical Bill Payment Records (Version 1.01). We have no comments to provide at this time.	Jose Ruiz Claims Operations and Systems Manager State Compensation Insurance Fund Written Comment August 26, 2010	The Division appreciates all rulemaking comments submitted by State Fund.	None.
9701-9702	We continue to appreciate the changes to the regulations regarding the effective date. There is still concern, however, that these rules may become final before the Physician Reporting and E-Billing regulations take effect, creating a disconnect between what WCIS reporters are required to submit and what information is coming to them from providers. We recommend holding these regulations, or at least the Medical Reporting portion, until they can be sent to the Office of	Steven Suchil Assistant Vice President American Insurance Association Written Comment August 26, 2010	See above response to California Workers' Compensation Institute.	None.

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	Administrative Law with the Physician Reporting and E-Billing regulations. Alternatively, perhaps the effective date could be tied to finalization of the E-Billing and Physician Reporting changes.			
9701-9702	<p>1. Will the WCIS have all of the changes/edits in the new implementation guide available for testing or running in production on the first day of the 12 month adoption grace period?</p> <p>2. If any condition exists where the WCIS is not able to accept both the pre and/or the post 1.1 regulations during the 12 month adoption period, will the trading partners be formally notified other than file or bill acceptances or rejects?</p>	Jeffrey M. Lawliss Sr. Business Analyst, IT- State Reporting Coventry Workers' Comp Services	WCIS will not have all of the changes/edits in the proposed implementation guides available for testing or running in production on the first day of the 12- month adoption grace period. The proposed changes/edits will be phased in for testing or production during the 12-month adoption grace period, with advanced notice being given to trading partners as to when submissions under specific changes/edits can be made. All trading partners will be provided sufficient opportunity to test their submissions under the proposed changes/edits prior to the effective date of the regulations.	None.