



California Workers' Compensation Institute
1111 Broadway Suite 2350, Oakland, CA 94607 • Tel: (510) 251-9470 • Fax: (510) 763 -1592

September 19, 2014

VIA E-MAIL to dwcrules@dir.ca.gov

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

RE: CWCI 1st 15-Day Comment on Modifications to Proposed Workers' Compensation Information System (WCIS) Regulations

Dear Ms. Gray:

These comments on the proposed revisions to the Workers' Compensation Information System (WCIS) regulations are presented on behalf of members of the California Workers' Compensation Institute (the Institute). Institute members include insurers writing 71% of California's workers' compensation premium, and self-insured employers with \$46B of annual payroll (26% of the state's total annual self-insured payroll).

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

Self-insured employer members are Adventist Health, Agilent Technologies, 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 San Bernardino Risk Management, County of Santa Clara Risk Management, 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, Sutter Health, University of California, and The Walt Disney Company.

Comments and discussion by the Institute are indented and identified by *italicized text*.

**California Electronic Data Interchange (EDI) Implementation Guide for Medical Bill Payment
Records Version 2.0**

Recommendation

DN0760 – Prior Actual Amount Paid

Replace “NA” with “MC” for original lien settlement bills to conform to the *IAIABC Workers’ Compensation Medical Bill Data Reporting Implementation Guide Release 2.0* requirement for DN076.

Discussion

The California EDI Implementation Guide at page 73 indicates that DN0760 is not applicable (NA) when reporting an original lien settlement bill, but in the Business Condition/Mandatory Trigger section states “Required when reporting bill adjudication actions related to medical bill(s) previously paid”.

The IAIABC reporting requirement states:

“DN0760 (Prior Actual Amount Paid) will be populated with the total amount the insurer or claim administrator previously paid for all medical bills contained in the aggregate or summary record.”

If the data element is not applicable to original lien settlement bills then the conditional language should be removed.

Recommendation

Include an explanation of the deletion of DN0729 and the related California jurisdiction codes that were previously required for reporting lien settlements in the Final Statement of Reasons.

Discussion

The IAIABC Workers’ Compensation Medical Bill Data Reporting Implementation Guide Release 2.0 identifies three Lump Sum Payment/Settlement codes (SP, SF and AW), which serve as replacements for the jurisdictional codes (MDS10, MDO10, MDS11, MDO11, MDS21, MDO21) currently required for WCIS reporting. An explanation regarding the change in reporting requirement would serve to highlight programming changes that may be required to capture information in a different manner for WCIS reporting purposes.

Thank you for considering these comments. Please contact me if further clarification is needed.

Sincerely,

Stacy Jones
Senior Research Associate

SJ/pm

cc: Destie Overpeck, DWC Acting Administrative Director
Genet Daba, DWC Research Program Specialist
CWCI Claims Committee
CWCI Medical Care Committee
CWCI Regular Members
CWCI Associate Members