



California Workers' Compensation Institute

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August 26, 2010

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

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

**RE: WCIS – 2nd 15-day Comments on Modifications to Proposed WCIS
Regulatory Changes**

Dear Ms. Gray:

This 2nd 15-day comment on modifications to proposed changes to the Workers' Compensation Information System (WCIS) regulations is presented on behalf of members of the California Workers' Compensation Institute (the Institute). Institute members include insurers writing 84% of California's workers' compensation premium, and self-insured employers with \$36B of annual payroll (20% of the state's total annual self-insured payroll).

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.

Thank you for your consideration. Please contact me for further clarification or if I can be of any other assistance.

Sincerely,

Brenda Ramirez
Claims and Medical Director

BR/ja

cc: Carrie Nevans, DWC Acting Administrative Director
Destie Overpeck, DWC Chief Legal Counsel
CWCI Regular Members
CWCI Associate Members
CWCI Claims Committee
CWCI Medical Care Committee
CWCI Return to Work Committee
CWCI OMFS Committee