Workers' Compensation Information Systems (WCIS)	RULEMAKING COMMENTS 2ND 15 DAY COMMENT PERIOD	NAME OF PERSON/ AFFILIATION	RESPONSE	ACTION
General Comment	Commenter has reviewed the proposed revisions to the regulations and has no comments as this time.	Peggy Thill Claims Operations Manager State Compensation Insurance Fund (SCIF) November 26, 2014 Written Comment	Acknowledged.	None.
General Comment	Commenter has reviewed the proposed revisions to the regulations and has no comments as this time.	Stacy Jones Senior Research Associate California Workers' Compensation institute (CWCI) November 26, 2014 Written Comment	Acknowledged.	None.
9702(e)	Commenter notes that the proposed regulations deleted the date of service on page 10, however, the new guide (v. 2.0), Section I, 5th paragraph it references bills with a Date of Service on or after September 22, 2006 and a Date of Injury on or after March 1, 2000 are to be submitted to the DWC. Commenter requests that the Division clarify. Commenter notes that the second sentence states that "The California	Janice L. Bell, AIDM Assistant Vice President Zenith Insurance November 20, 2014 Written Comment	The 90-day requirement is in the proposed regulations at 8 C.C.R. §9702(e)(1)-(2). On page 1 of the CA EDI Implementation Guide, the 90-day reporting requirement language is also included.	None.

Workers' Compensation Information Systems (WCIS)	RULEMAKING COMMENTS 2ND 15 DAY COMMENT PERIOD	NAME OF PERSON/ AFFILIATION	RESPONSE	ACTION
	EDI Implementation Guide for Medical Bill Payment Records sets forth the specific California reporting requirements." And the 90 calendar days required to submit records was deleted. There is no reference in the new guide (v. 2.0) to state when these are due to be submitted**.** Commenter requests that the Division clarify.			
CA EDI Implementation Guide – Version 2.0 – Medical Data Elements Table – Page 45	SSN – commenter notes is now a Mandatory Conditional field, required when the EE has a SSN. **If EE has no SSN is there a default they can use? Commenter opines that this should be consistent with the EDI FROI/SROI requirements which allow a default for SSN.**	Janice L. Bell, AIDM Assistant Vice President Zenith Insurance November 20, 2014 Written Comment	Agreed.	On Page 45 of the CA EDI Implementation Guide, on the requirement for DN0042, DWC has added the following language: "If the employee does not have a SSN use default value of '000000006'."
CA EDI Implementation Guide – Version 2.0 – Matching injured worker claims between FROI and medical	This section specifically states "A Jurisdiction Claim Number (JCN) is created by the WCIS to uniquely identify each claim". CA WCIS is now requiring a combination of Jurisdiction Claim Number (DN0005), Claim Administrator Claim Number	Janice L. Bell, AIDM Assistant Vice President Zenith Insurance November 20, 2014 Written Comment	DWC disagrees. Having the JCN as the primary match will not be effective in matching a FROI with a medical bill. In the current WCIS reporting, the JCN is the primary match. Examination of our database	None.

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bill – page 71	(DN0015), and Insurer FEIN (DN0006) to match medical bills in the 837 to claims previously reported in the FROI as clarified in the 10/20/14 Advisory Committee Meeting presentation, ***and will reject all bills where any one of these three do not match what was submitted on the FROI.*** Commenter disagrees with this approach and opines that the DWC/WCIS should use the Match Data Criteria defined by the IAIABC standards for a tiered matching approach, for example if match on **JCN** and **Date of Injury** and **Insurer FEIN**, then match to FROI. *DWC/WCIS can use a combination of matching 3-5 data elements, one at a time, to determine if the medical bill is a match to a FROI as outlined in the IAIABC Match Data Rules. Many bill review systems will alter Claim Administrator Claim Number to avoid duplicate claim numbers in their system and/or submissions. This is still a significant problem for the		has shown claims having the same JCN but different employee information. Having a combination of the three fields is believed to result in more robust and accurate matching. For this reason, the change recommended by Zenith will not be made.	

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	industry. If the JCN is **created by the DWC and uniquely identifies each claim and will now be required on each medical bill record**, commenter opines that this should be used as a primary match.			
CA EDI Implementation Guide – Version 2.0 - Implementation Data Element Syntax Error Code IK4 segment – Pages 16 and 17	Commenter states that on Page 17, the Error I10 label does not appear to read correctly. Error I10 Implementation "Not Us value previously reported.	Kathleen Garrety Sr. Business Analyst Liberty Mutual November 26, 2014 Written Comment	DWC disagrees as it does not see any error to correct.	None.
CA EDI Implementation Guide – Version 2.0 - California-adopted ANSI 837 loops, segments, and data elements summary – Page 29	Commenter states that on Page 29, the loop is not reflected correctly as per the IAIABC guide – DN0042 Employee Social Security Number should be after DN0045 Employee Middle Name/Initial.	Kathleen Garrety Sr. Business Analyst Liberty Mutual November 26, 2014 Written Comment	Agreed.	On page 29 of the CA EDI Implementation Guide, DN0042 was misplaced and has been moved up to the correct position.
CA EDI Implementation Guide – Version	Commenter states that the Billing Provider Primary Address is listed twice on Page 31.	Kathleen Garrety Sr. Business Analyst Liberty Mutual	Agreed.	The error has been corrected.

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2.0 - California-adopted ANSI 837 loops, segments, and data elements summary – Page 31		November 26, 2014 Written Comment		
CA EDI Implementation Guide – Version 2.0 - Medical Data Elements Requirement Table – Page 45	Commenter states that on Page 45, DN0188 Claim Administrator Name is listed as a Mandatory field. The IAIABC Guide lists Loop 2010AB Claim Administrator Information as Situational and the Data Element table lists the field as Mandatory Conditional. In many cases, DN0188 and DN0007 Insurer Name will be reporting the same name. Commenter inquires if the requirements for DN0188 should mirror the IAIABC Guide and then report this field if different than DN0007?	Kathleen Garrety Sr. Business Analyst Liberty Mutual November 26, 2014 Written Comment	DWC disagrees. On page 48 of the CA EDI Implementation Guide, DN 0188 (Claims Administrator Name) will be used in WCIS reports which give feedback to Trading Partners on their data quality and completeness, as well as data analysis of reported data. Examination of historical reporting pattern where WCIS allowed reporting of only one field resulted in inaccurate reporting.	None.
CA EDI Implementation Guide – Version 2.0 - Page 48.	Loop 2310A is listed as a Required Loop in the IAIABC Guide and DN028 Billing Provider Last/Group Name is listed as required. For Cancellations, DN0528 is listed as N/A. This is an issue when trying to submit a cancellation since the loop is required and must have the required field.	Kathleen Garrety Sr. Business Analyst Liberty Mutual November 26, 2014 Written Comment	Agreed.	On the CA EDI Implementation Guide, DWC has changed the Requirement for DN0528 from "N/A" to "M."

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CA EDI Implementation Guide – Version 2.0 - Medical Data Elements Requirement Table – Page 49	Commenter notes that on Page 49, DN0556 Condition Code has this applicable for I, P and D. The IAIABC Data Element Table has this field excluded for bill types other than Institutional.	Kathleen Garrety Sr. Business Analyst Liberty Mutual November 26, 2014 Written Comment	DWC disagrees. For DN0556, the IAIABC recommends following the Jurisdiction Implementation Guide. Since California uses this data element in bill adjudication for institutional, professional and dental bills, CA will collect this data element for all bill types.	None.
CA EDI Implementation Guide – Version 2.0 – Lump sum bundled line bill payment – Page 75	Commenter notes that on Page 75, there is an incomplete sentence beginning with "On DN 0512 Date Insurer Paid Bill".	Kathleen Garrety Sr. Business Analyst Liberty Mutual November 26, 2014 Written Comment	Agreed.	DWC made the following change: completed the sentence that starts with, "On DN0512 Date Insurer Paid Bill" by adding "use the date final payment was made." This language now appears on page 74 of the CA EDI Implementation Guide.