

SFTP BULK FILING QUESTIONS / COMMENTS / ISSUES

Item Number	Submitting Organization	Submitted By	Date Submitted	<u>Question / Comment / Issue</u>	<u>Question / Comment / Issue Response</u>
	State Fund	Joshua Bright	2/24/2010	<p>I have several questions that I am asking in order to determine what resources we may need to enlist to deal with the SFTP transfer part of the project and what steps I may need to initiate with State Fund's Enterprise Security folks.</p> <p>I understand that the transfer, being that it is using the secure file transfer protocol (the emphasis being on "secure"), is secure as the data is in transit. Please describe DWC's plans with respect to whether the payload will be encrypted while in transit and where the payload will be delivered (i.e., whether the file transfer will terminate inside or outside of the DWC's firewall).</p> <p>From a practical standpoint, it would facilitate developing the necessary procedures for State Fund and other claims administrators covered by the reporting requirements for the Workers' Compensation Information System (WCIS) if the DWC were to employ the same transfer processes and procedures that are in place for the WCIS system.</p>	

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				<p>As you possibly know, and certainly others at DWC would be able to relate, State Fund objected to DWC's initial design of the data transfer process for WCIS. Although it employed SFTP, the process deposited the unencrypted payload outside of DWC's firewall. State Fund's security policies prohibit any information containing "personally identifiable information" or "personal health information" (as those terms are defined by California law) from residing unencrypted outside of a secure network, no matter how briefly.</p>	
	EDD	Kim Lincoln-Hawkins	2/24/2010	<p>On behalf of EDD, I want to respond to item #38 listed in the minutes. Although this item is not part of the present term solution, the commentary on the telephone by one of the attorney firms mentioned the possibility of limiting access to medical information filed in EAMS from third party filers. If this is the intent of "must have" 38 then EDD opposes this requirement wholeheartedly. I would like to remind our external partner of the following information:</p>	

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				<p>Per Title 8, California Code of Regulations (CCR), Section 10608 (a) entitled Filing and Service of Physicians' Reports states: After filing of an Application for Adjudication, if a party is requested by another party or lien claimant to serve copies of physicians' reports relating to the claim, the party receiving the request shall serve copies of the reports on the requesting party or lien claimant within six (6) days of the request; the party receiving the request shall serve a copy of any subsequently-received physicians' report within six (6) days of receipt of the report.</p> <p>Also per Title 8, CCR, Section 10615 entitled Continuing Duty to serve states: During the continuing jurisdiction of the Workers' Compensation Appeals Board, the parties have a continuing duty to serve on each other and any lien claimant requesting service of any physicians' reports received.</p> <p>My intent here is to protect EDDs and the ratepayer's rights.</p>	