

**Regulatory Update**  
**Workers' Compensation Information System**  
**WCIS Advisory Committee**  
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# Regulatory Update

- California EDI Implementation Guide for Medical Bill Payment Records, Version 2.0
- California EDI Implementation Guide for First and Subsequent Reports of Injury, Versions 3.0 & 3.1
- Administrative Penalties

# Medical Billing Data

- California EDI Implementation Guide for Medical Bill Payment Records, Version 2.0 was updated in April 2015 to reflect and be consistent with requirements in IAIABC's Workers' Compensation Medical Bill Data Reporting Implementation Guide, Release 2.0 (dated February 1, 2014).
- California EDI Implementation Guide for Medical Bill Payment Records, Version 2.0 is being further updated to reflect and be consistent with requirements in IAIABC's Workers' Compensation Medical Bill Data Reporting Implementation Guide, Release 2.0 (dated February 1, 2015). These changes should take effect on or around April 2016.
- Title 8, California Code of Regulations sections 9701 and 9702 are being simultaneously updated to reflect and be consistent with new EDI reporting requirements.

# First Report & Subsequent Reports of Injury

- California EDI Implementation Guide for First and Subsequent Reports of Injury, Version 3.0 was released on November 1, 2011.
- WCIS is in the process of updating the EDI Implementation Guide for First and Subsequent Reports of Injury to Version 3.1, and 8 C.C.R. section 9701 and 9702.

## First Report & Subsequent Reports of Injury

- The current updates to the FROI/SROI Guide are being accomplished in the same rulemaking as the updates to Medical Data Reporting. We anticipate the rulemaking being complete by the end of the first half of 2016.

# Administrative Penalties

- Labor Code section 138.6 requires DWC to:
- Assess administrative penalties for WCIS data reporting violations by claims administrators.
- Promulgate a schedule of penalties capped at \$5,000 against a claims administrator in any given year.
- The schedule shall provide for no more than \$100 per violation for violations where a report is not submitted or not accepted, and no more than \$50 per violation for violations involving errors or late filings.

# Administrative Penalties

- Establish threshold rates of violations that shall be excluded from the calculation of penalty assessments.
  - Threshold rates cannot be less than 3% of the reports filed by the claims administrator.
  - Higher thresholds rates for data elements that commonly are not reasonably available.
- Publish an annual report on the compliance of claims administrators.