

California Coalition on Workers' Compensation  
California Chamber of Commerce  
California Manufacturers & Technology Association  
California Trucking Association  
California State Association of Counties  
League of California Cities  
Association of California Insurance Companies  
California Restaurant Association  
California Grocers Association  
California Hospital Association  
California Manufacturers & Technology Association  
National Federation of Independent Business  
Gallagher Bassett Services, Inc.  
Sedgwick Claims Management Services, Inc.  
Metro Risk Management  
Matian Law Group  
University of California  
Schools Insurance Authority  
Southern California Edison  
Employers Group  
Grimmway Farms  
Marriott International, Inc.  
GSG Associates  
Safeway

June 21, 2013

Maureen Gray  
Regulations Coordinator  
Department of Industrial Relations  
P.O. Box 420603  
San Francisco, CA 94612

**RE: Proposed Regulations: Supplemental Job Displacement Benefit Voucher**

Dear Ms. Gray,

The above-listed organizations thank you for the opportunity to provide feedback on the proposed regulations for the Supplemental Job Displacement Benefit Voucher. Combined, our organizations represent tens of thousands of insured and self-insured public and private sector California employers and insurance companies.

While there have been several estimates of the savings associated with SB 863 (De Leon, 2012), it is clear that the ultimate impact on employers (large and small, insured and self-insured) will depend largely on the implementation work that takes place over the next several months at the Department of Industrial Relations, the Division of Workers' Compensation (DWC), the

Office of Self Insurance Plans, and the Workers' Compensation Appeals Board. The above-listed organizations are dedicated to working collaboratively with regulators throughout the implementation process to ensure that employers across California receive the relief anticipated during the passage of SB 863 (De Leon, 2012).

Our coalition would like to thank you for considering and accepting some of the more important recommendations contained in the March 19, 2013 and May 30, 2013 comment letters from this coalition.

**Physician's Return to Work & Voucher Report**

Our past coalition comments have provided mocked-up versions of the Physician's Return to Work & Voucher Report, and we thank you for accepting some of our recommended changes. We are concerned that the form, as proposed, will confuse the physicians responsible for completion. Instead, we propose that the DWC attempt to harmonize this form with the functional capacity assessment portion of the PR4. Physicians have experience utilizing this form and are less likely to experience problems if harmonization occurs.

Alternatively, we propose that this form be harmonized and combined with the PR4 so that a claims administrator can tear off the RTW portion and send it to the employer. The result would be less confusion and streamlined paperwork for physicians and a quicker resolution of important details for injured workers and employers.

Thank you once again for the opportunity to comment on the proposed regulation. If you have any questions, please feel free to contact Jason Schmelzer with the California Coalition on Workers' Compensation (916-441-4111) Jeremy Merz with the California Chamber of Commerce (916-930-1227).

Sincerely,



Jason Schmelzer  
CCWC



Jeremy Merz  
CalChamber

cc. David Lanier, Chief Deputy Legislative Secretary, Office of Governor Edmund G. Brown  
Christine Baker, Director, Department of Industrial Relations  
Destie Overpeck, Acting Administrative Director, Division of Workers' Compensation