



California Workers' Compensation Institute
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November 12, 2025

VIA E-MAIL – DWCForums@dir.ca.gov

Division of Workers' Compensation
P.O. Box 420603
San Francisco, CA 94142
Attn: DWC Forums

**Re: Proposed Changes to the Electronic Adjudication Management System
(EAMS) Regulations**

Dear Forum Director:

These written comments on proposed modifications to the text of rules related to the Electronic Adjudication Management System Regulations are presented on behalf of members of the California Workers' Compensation Institute (the Institute). Institute members include insurers writing 76% of California's workers' compensation premium, and self-insured employers with \$92B of annual payroll (30.3% of the state's total annual self-insured payroll).

Insurer members of the Institute include AF Group/CompWest, AIG, AmTrust North America, Berkshire Hathaway Homestate Companies, CHUBB, CNA, CopperPoint Insurance Companies, Crum & Forster, EMPLOYERS, Everest Insurance, GUARD Insurance Companies, The Hanover Insurance Group, The Hartford, ICW Group Insurance Companies, Liberty Mutual Insurance, North American Casualty Company/Applied Underwriters, Pie Insurance, Preferred Employers Insurance, Republic Indemnity, Sentry Insurance, State Compensation Insurance Fund, Travelers, WCF Insurance, Zenith Insurance Company, and Zürich North America.

Self-insured employer members include Albertsons Companies, Alliance of Schools for Cooperative Insurance Programs, BETA Healthcare Group Risk Management Authority, California Fair Services Authority, California Joint Powers Insurance Authority, California State University Risk Management Authority, City and County of San Francisco, City of Los Angeles, City of Pasadena, Costco Wholesale, County of Los Angeles, County of Santa Clara Risk Management, Dignity Health, Disneyland Resort, East Bay Municipal Utility District, Grimmway Farms, Kaiser Permanente, Loma Linda University Health Risk Management, North Bay Schools Insurance Authority, Pacific Gas & Electric Company, San Diego Gas & Electric Company, Schools Insurance Authority, Shasta County Risk Management, Shasta-Trinity Schools Insurance Group, Southern California Edison, Southern California Gas Company, Special District Risk Management Authority, Sutter Health, United Airlines, and the University of California.

The Institute offers the following comments:

Section 10205.5(b)(1):

The Institute supports the addition of each system participant's electronic address to the EAMS record.

Section 10205.6:

We support the deletion of this section and the default to service by first-class mail.

Section 10205.7(b)(5):

The Institute supports the deletion of this section and the reference to former section 10500, for consistency with section 10629.

Section 10205.7(c):

We recommend that all references within this section be changed from "fax" to "facsimile" for consistency.

Section 10205.10(g):

The Institute supports the addition of this section to allow electronic signatures on all documents to increase efficiency for stakeholders and to promote consistency between district offices.

Thank you for the opportunity to comment. Please contact us if additional information would be helpful.

Sincerely,

Sara Widener-Brightwell

Sara Widener-Brightwell, EVP and General Counsel
California Workers' Compensation Institute

SWB/pm

cc: Jennifer Osborn, DIR Director
George Parisotto, DWC Administrative Director
CWCI Claims Committee
CWCI Medical Care Committee
CWCI Legal Committee
CWCI Regular Members
CWCI Associate Members