



June 28, 2024

via email: rulecomments@tdi.texas.gov

Texas Department of Insurance, Division of Workers' Compensation
P.O. Box 12050
Austin Texas 78711

Re: Draft DWC Forms 001, 006, and 032

To Whom it May Concern:

These comments are submitted on behalf the Insurance Council of Texas (ICT), a property and casualty insurance trade association representing the interests of nearly 400 insurers who do business in Texas, including many who write workers' compensation insurance. In addition, our associate members include various companies who provide cost containment, legal, and claims administration support to the workers' compensation industry.

The Texas Department of Insurance, Division of Workers' Compensation (DWC), has proposed changes to several forms and is seeking feedback from stakeholders. We appreciate the opportunity to review and comment on Draft DWC Form-001, *Employer's First Report of Injury or Illness*; Draft Form-006, *Supplemental Report of Injury*; and DWC Form-032, *Request for Designated Doctor Examination*.

Below are our comments and recommendations for each form listed above, which our members believe will enhance their clarity and usability, better meeting the needs of all stakeholders.

Draft DWC Form-001, *Employer's First Report of Injury or Illness*

As currently formatted, there is no incident specific data on the signature page to correlate the signed page with the remainder of the DWC-001. The Division should consider editing the form so that the signature block is on a substantive page.

Draft Form-006, *Supplemental Report of Injury*

The Division should consider putting the injured employee's information at the top of the form (Part 1) as this is how carriers generally identify claims by name and date of injury. The employer information should be moved to Part 3.

DWC Form-032, *Request for Designated Doctor Examination*

Since the Division specifically asks whether the compensable injury has been established by an approved DWC-24 final decision/court order, the Division should have a box for including what the established compensable injury is and/or is not based on that document. Designated Doctors do not have the authority to overcome a judicial determination as to the scope of the compensable injury.

ICT appreciates the opportunity to review and provide feedback on these important matters. Please let us know if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, reading "Albert Betts". The signature is written in a cursive style with a large initial 'A' and a long horizontal stroke at the end.

Albert Betts
Executive Director