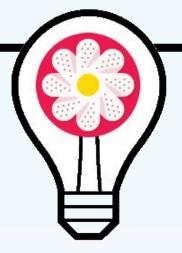


2018 Workers' Compensation Billing Update

05.31.2018



Today's Topics



E&M Codes Aren't Being Reimbursed
 Properly



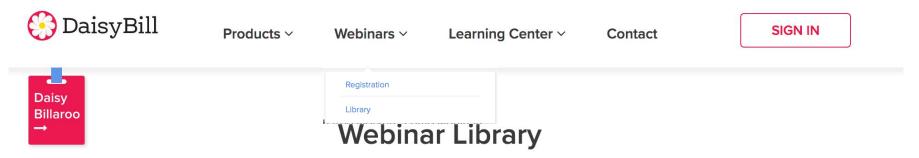
2. Automatic Authorization



3. Second Bill Reviews (appeals) are more important than ever



Free Webinars



Watch free workers' comp webinars





Today's Topics



1. E&M Codes Aren't Being Reimbursed

Properly



2. Automatic Authorization



3. Second Bill Reviews (appeals) are more important than ever



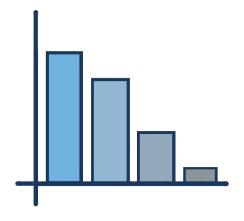
E/M Visits Downcoded





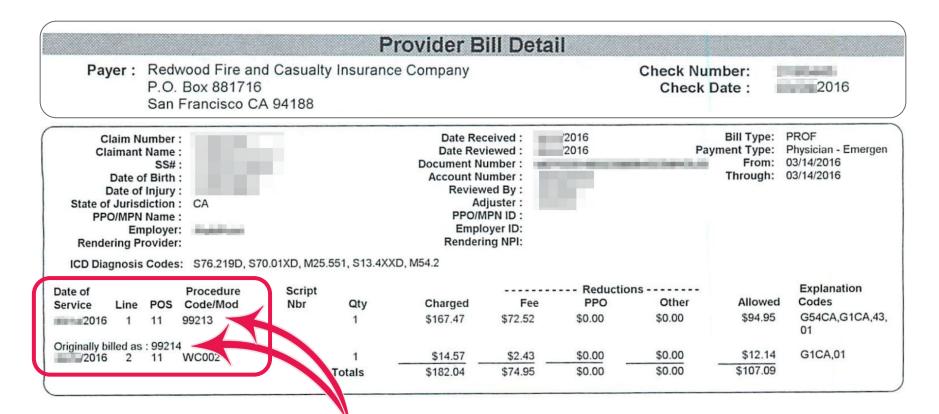
Downcoding = Lost Revenue

СРТ	OMFS 2018	Downcode OMFS	Lost Revenue	Lost Revenue Percentage
99211	\$30.90			
99212	\$61.67	\$30.90	-\$30.77	-49%
99213	\$101.39	\$61.67	-\$39.72	-39%
99214	\$149.32	\$101.39	-\$47.93	-32%
99215	200.52	\$149.32	-\$51.20	-26%





Incorrect Downcoding



Originally billed as CPT 99214; downcoded to CPT 99213



Reasons for Downcoding

1. Carrier incorrectly downcoded

2. Documentation is incomplete

3. Documentation doesn't support level billed





§ 9789.12.11 Evaluation and Management: Coding

- (b) To properly document and determine the appropriate level of evaluation and management service, physicians and qualified non-physician practitioners must use either one of the following guidelines but not a combination of the two guidelines for a patient encounter. If the physician's or qualified non-physician practitioner's documentation for a medically necessary service conforms to either one of the guidelines, the maximum reasonable fee shall be according to the documented level of service:
- (1) The "1995 Documentation Guidelines for Evaluation & Management Services," or
- (2) The "1997 Documentation Guidelines for Evaluation and Management Services."



§ 9789.12.11 Evaluation and Management: Coding

- (b) To properly document and determine the appropriate level of evaluation and management service, physicians and qualified non-physician practitioners must use either one of the following guidelines but not a combination of the two guidelines for a patient encounter. If the physician's or qualified non-physician practitioner's documentation for a medically necessary service conforms to either one of the guidelines, the maximum reasonable fee shall be according to the documented level of service:
- (1) The "1995 Documentation Guidelines for Evaluation & Management Services," or
- (2) The "1997 Documentation Guidelines for Evaluation and Management Services."



Documentation Guidelines

II. GENERAL PRINCIPLES OF MEDICAL RECORD DOCUMENTATION

The principles of documentation listed below are applicable to all types of medical and surgical services in all settings. For Evaluation and Management (E/M) services, the nature and amount of physician work and documentation varies by type of service, place of service and the patient's status. The general principles listed below may be modified to account for these variable circumstances in providing E/M services.

- The medical record should be complete and legible.
- The documentation of each patient encounter should include:
 - reason for the encounter and relevant history, physical examination findings, and prior diagnostic test results;
 - assessment, clinical impression, or diagnosis;
 - plan for care; and
 - date and legible identity of the observer.
- If not documented, the rationale for ordering diagnostic and other ancillary services should be easily inferred.
- Past and present diagnoses should be accessible to the treating and/or consulting physician.
- Appropriate health risk factors should be identified.
- 6. The patient's progress, response to and changes in treatment, and revision of diagnosis should be documented.
- 7. The CPT and ICD-9-CM codes reported on the health insurance claim form or billing statement should be supported by the documentation in the medical record.



Reason for Requesting Second Bill Review



State of California Division of Workers' Compensation Provider's Request for Second Bill Review

California Code of Regulations, title 8, section 9792.5.6

The Medical Provider signing below seeks reconsideration of the denial and/or adjustment of the billed charges for the medical services or goods, or medical-legal services, provided to the injured employee.

Date of Service	Service/Good in Dispute (include modifier, if any)	Service/Good Authorized?	Amount Billed	Amount Paid	Amount in Dispute	Supporting Documentation Attached?
		Yes No				Yes No
Reason for I	Requesting Second Bill Re	view and Description	of Supporting	Documenta	tion:	



Today's Topics



 E&M Codes Aren't Being Reimbursed Properly



2. Automatic Authorization



3. Second Bill Reviews (appeals) are more important than ever



Automatic Authorization





SB 1160 Section 3.5 § 4610. amended Effective:

January 1, 2018

(j) This section shall remain in effect only until January 1, 2018, and as of that date is repealed, unless a later enacted statute, that is enacted before January 1, 2018, deletes or extends that date.

LC 4610 Repealed Effective January 1, 2018

California Labor Code Section 4610

610. (a) For purposes of this section, utilization review means utilization review or utilization management functions that prospectively, retrospectively, or concurrently review and approve, modify, delay, or deny, based in whole or in part on medical necessity to cure and relieve, treatment recommendations by physicians, as defined in Section 3209.3, prior to retrospectively, or concurrent with the provision of medical tree.

REPEALED

and procedures. These policies and procedures snan-croum span decisions based on the medical necessity to cure and relieve of proposed medical treatment services are consistent with the schedule for medical treatment utilization adopted pursuant to Section 5307.27. These policies and procedures, and a description of the utilization process, shall be filed with the administrative director and shall be disclosed by the employer to employees, physicians, and the public upon request.



SB 1160 Replaces Labor Code 4610

Section	Labor Code	Summary	Effective
1	138.4. amended	Employee medical treatment when claim denied	Jan 1, 2018
2	138.6. amended	Increase WCIS penalty for failure to report data	Jan 1, 2017
3.5	4610. amended	Utilization review language clarified. Removes 'delay'	Jan 1, 2017
4.5	4610. added	Replaces current utilization review Labor Code	Jan 1, 2018
5	4610.05. amended	Adds medication formulary to IMR disputes	Jan 1, 2017
6	4610.6. amended	Clarifies IMR decision time requirements	Jan 1, 2017
7	4615. added	Physician liens stayed upon filing of criminal charges	Jan 1, 2017
8	4903.5. amended	Lien declaration amended	Jan 1, 2017
9	4903.8. amended	Lien ownership requirements clarified	Jan 1, 2017
10	5307.27. amended	MTUS update change notification	Jan 1, 2017
11	5710. amended	Deposition costs	July 1, 2018
12	5811. amended	Court witness interpreter fees	Jan 1, 2018
13	6409. amended	Physician report of occupational injury/illness	Jan 1, 2017
A	4		



New Labor Code 4610 Effective 1/1/2018

SEC. 4.5. Section 4610 is added to the Labor Code, to read:

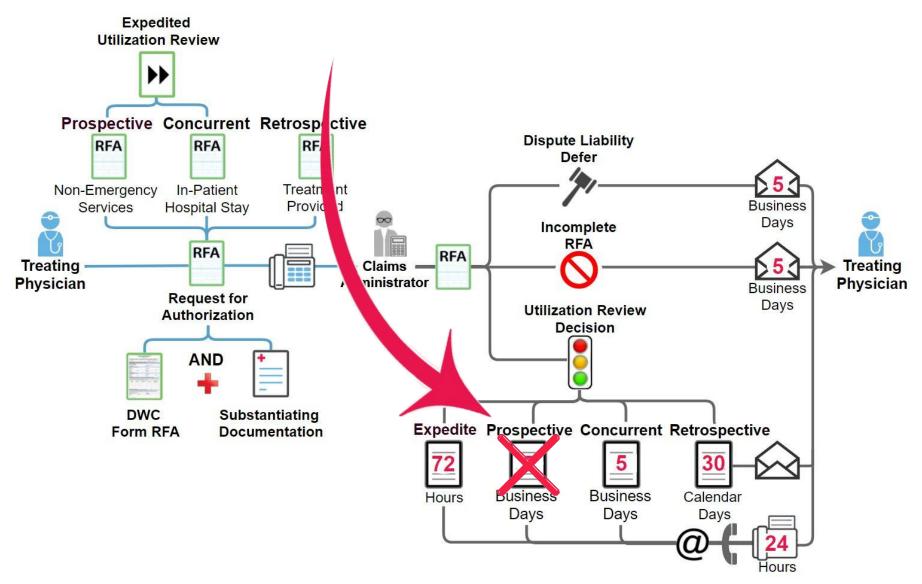
4610. (a) For purposes of this section, "utilization review" means utilization review or utilization management functions that prospectively, retrospectively, or concurrently review and approve, modify, or deny, based in whole or in part on medical necessity to cure and relieve, treatment recommendations by physicians, as defined in Section 3209.3, prior to, retrospectively, or concurrent with the provision of medical treatment services pursuant to Section 4600.

(b) For all dates of injury occurring on or after January 1, 2018, emergency treatment services and medical treatment rendered for a body part or condition that is accepted as compensable by the employer and is addressed by the medical treatment utilization schedule adopted pursuant to Section 5307.7, by a member of the medical provider network or health care organization, or by a physician predesignated pursuant to subdivision (d) of Section 4600, within the 30 days foll ing the initial date of iury, shall i rized without prospective utilization review, except as provided in subdivision (c). The services re with the medical treatment utilization schedule. In the d under this subd be consiste event that the employee is not subject to t er network, heal care organization, or predesignated physician itment with a medica r this section within 30 days following the initial date pursuant to subdivision (d) of Section 4600 ne employee shall be e for treatment un of injury if the treatment is rendered by a p sician or facility seled eatment rendered by a medical provider network / th ployer. For physician, health care organization physicial a physician predesig pur. o sube on (d) of Section 4600, or an employer-selected physician, the report required under Section 09 and a complete st for n shall be submitted by the physician within five days following the employee's initial visit and eval tion.

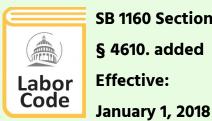
- (c) Unless authorized by the employer or render as emerger med t, the owin I treatment services, as defined in rules al t tme adopted by the administrative director, that are released the mb of t medic work or health care organization, a ugh a i provid predesignated physician, an employer-selected physic or an emp ect facility, thin the 0 days following the initial date of injury, ∕er-s shall be subject to prospective utilization review unde section
- (1) Pharmaceuticals, to the extent they are neither expression prospective review nor authorized by the drug formulary adopted pursuant to Section 5307.27.
- (2) Nonemergency inpatient and outpatient surgery, including all presurgical and postsurgical services.
- (3) Psychological treatment services.
- (4) Home health care services.
- (5) Imaging and radiology services, excluding X-rays.
- (6) All durable medical equipment, whose combined total value exceeds two hundred fifty dollars (\$250), as determined by the official medical ...



Prospective Utilization Review Eliminated





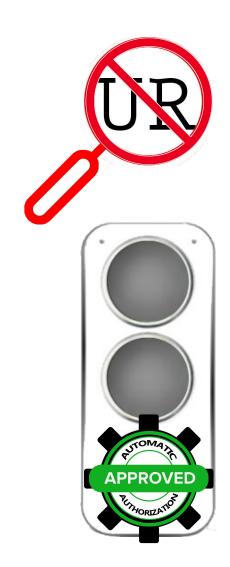


SB 1160 Section 4.5 § 4610. added **Effective:**

(b) For all dates of injury occurring on or after January 1, 2018, emergency treatment services and medical treatment rendered for a body part or condition that is accepted as compensable by the employer and is addressed by the medical treatment utilization schedule adopted pursuant to Section 5307.7, by a member of the medical provider network or health care organization, or by a physician predesignated pursuant to subdivision (d) of Section 4600, within the 30 days following the initial date of injury, shall be authorized without prospective utilization review, except as provided in subdivision (c).

DaisvBill 2018

Prospective Utilization Review **NOT Required**





SB 1160 Section 4.5 § 4610. added Effective:

January 1, 2018

(b) For all dates of injury occurring on or after January 1, 2018, emergency treatment services and medical treatment rendered for a body part or condition that is accepted as compensable by the employer and is addressed by the medical treatment utilization schedule adopted pursuant to Section 5307.7, by a member of the medical provider network or health care organization, or by a physician predesignated pursuant to subdivision (d) of Section 4600, within the 30 days following the initial date of injury, shall be authorized without prospective utilization review, except as provided in subdivision (c).

Prospective Utilization Review NOT Required





Automatic Authorization - **Six** Required Conditions

- 1. Dates of injury as of January 1, 2018
- 2. Within 30 days of initial injury
- 3. Body part or condition accepted as compensable
- 4. Treatment included in MTUS
- 5. Treatment provided by an MPN or HCO member or a predesignated physician
- 6. Treatment is not listed in subdivision (c) as ineligible
 - Pharmaceuticals
 - Non-emergency inpatient / outpatient surgery
 - Psychological treatment
 - ☐ Home health care
 - ☐ Imaging and radiology services, excluding x-ray
 - □ DME exceeding a combined total of \$250 per the OMFS
 - ☐ Electrodiagnostic medicine
 - ☐ Any other services designated by Administrative Director







(c) Unless authorized by the employer or rendered as emergency medical treatment, the following medical treatment services, as defined in rules adopted by the administrative director, that are rendered through a member of the medical provider network or health care organization, a predesignated physician, an employer-selected physician, or an employer-selected facility, within the 30 days following the initial date of injury, shall be subject to prospective utilization review under this section:





Ineligible Services - Require UR

- (1) Pharmaceuticals, to the extent the speither expressly exempted from prospective who have a by the drug formulary adopted pursures to Section 5307.27.
- (2) Nonemergency inpations and outpatient surgely including all presurgical and post gigal services.
- (3) Psychological treat that the rvice
- (4) Home health care s
- (5) Imaging and radiolog (5) exclusing X-1
- (6) All durable medical equant, whose combata total value exceeds two hundred a mined by the official medical feet.
- (7) Electrodiac dicine, including, but not limited to, electromy dicine, including but not limited to,
- (8) Any of the designated and defined through rules adopted by the administrative director.



(c) Unless authorized by the employer or rendered as emergency medical treatment, the following medical treatment services, as defined in rules adopted by the administrative director, that are rendered through a member of the medical provider network or health care organization, a predesignated physician, an employer-selected physician, or an employer-selected facility, within the 30 days following the initial date of injury, shall be subject to prospective utilization review under this section:



Ineligible Unless Employer Authorized







(c) Unless authorized by the employer or rendered as emergency medical treatment, the following medical treatment services, as defined in rules adopted by the administrative director, that are rendered through a member of the medical provider network or health care organization, a predesignated physician, an employer-selected physician, or an employer-selected facility, within the 30 days following the initial date of injury, shall be subject to prospective utilization review under this section:



Ineligible Unless Emergency





Automatic Authorization - **Six** Required Conditions

- 1. Dates of injury as of January 1, 2018
- 2. Within 30 days of initial injury
- 3. Body part or condition accepted as compensable
- 4. Treatment included in MTUS
- 5. Treatment provided by an MPN or HCO member or a predesignated physician
- 6. Treatment is not listed in subdivision (c) as ineligible
 - Pharmaceuticals
 - ☐ Non-emergency inpatient / outpatient surgery
 - Psychological treatment
 - ☐ Home health care
 - Imaging and radiology services, excluding x-ray
 - DME exceeding a combined total of \$250 per the OMFS
 - ☐ Electrodiagnostic medicine
 - ☐ Any other services designated by Administrative Director





Post-Treatment Requirements of Automatic Authorization

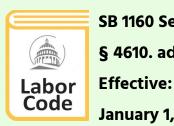


Post-Treatment Requirements and Deadlines

- 1. DLSR 5021, Doctor's First Report of Injury
 - Within 5 days
- 2. Request for Authorization
 - Within 5 days
- 3. Request for Payment
 - Non-Emergency
 - Within 30 days
 - Emergency
 - Within 180 days







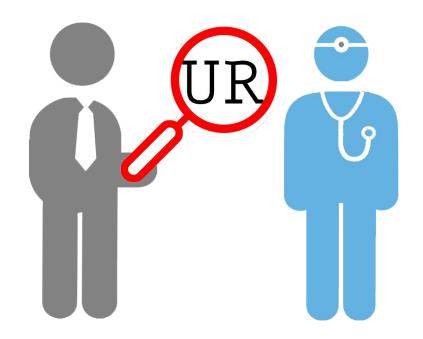
SB 1160 Section 4.5 § 4610. added

January 1, 2018

(f) An employer may perform retrospective utilization review for any treatment provided pursuant to subdivision (b) solely for the purpose of determining if the physician is prescribing treatment consistent with the schedule for medical treatment utilization, including, but not limited to, the drug formulary adopted pursuant to Section 5307.27.

Employer May Perform Retrospective UR to Investigate Physician

Solely to determine if physician is prescribing treatment consistent with the MTUS.





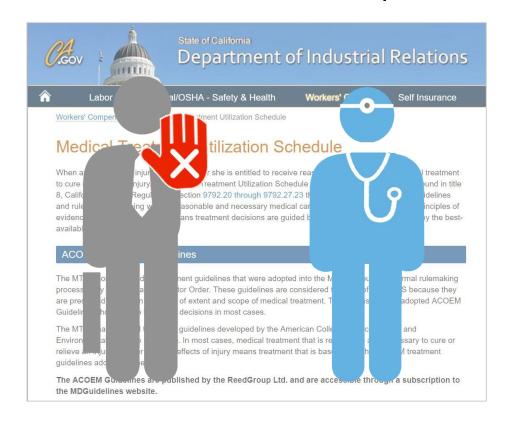


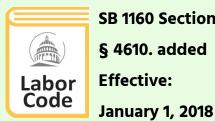
(f)(1) If it is found after retrospective utilization reviews that there is a pattern and practice of the physician or provider failing to render treatment consistent with the schedule for medical treatment utilization, including the drug formulary, the employer may remove the ability of the predesignated physician, employer-selected physician, or the member of the medical provider network or health care organization under this subdivision to provide further medical treatment to any employee that is exempt from prospective utilization review. The employer shall notify the physician or provider of the results of the retrospective utilization review and the requirement for prospective utilization review for all subsequent medical treatment.

© DaisyBill 2018

Provider Pattern of Inconsistency With MTUS

Employer may remove provider's ability to provide treatment that is exempt from UR.





SB 1160 Section 4.5 § 4610. added **Effective:**

(f)(2) The results of retrospective utilization review may constitute a showing of good cause for an employer's petition requesting a change of physician or provider pursuant to Section 4603 and may serve as grounds for termination of the physician or provider from the medical provider network or health care organization.

Provider Pattern of Inconsistency With MTUS

Employer may terminate provider from the MPN or HCO.



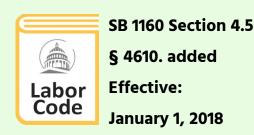


Post-Treatment Requirements and Deadlines

- 1. DLSR 5021, Doctor's First Report of Injury
 - Within 5 days
- 2. Request for Authorization
 - Within 5 days
- 3. Request for Payment
 - Non-Emergency
 - Within 30 days
 - Emergency
 - Within 180 days



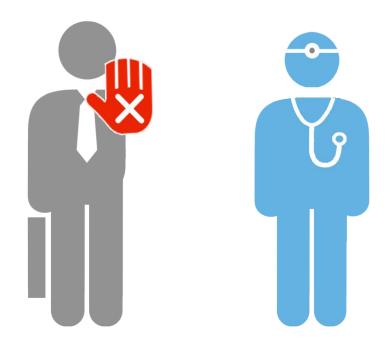




(e) If a physician fails to submit the report required under Section 6409 and a complete request for authorization, as described in subdivision (b), an employer may remove the physician's ability under this subdivision to provide further medical treatment to the employee that is exempt from prospective utilization review.

Failure to Timely Submit DLSR Report or RFA

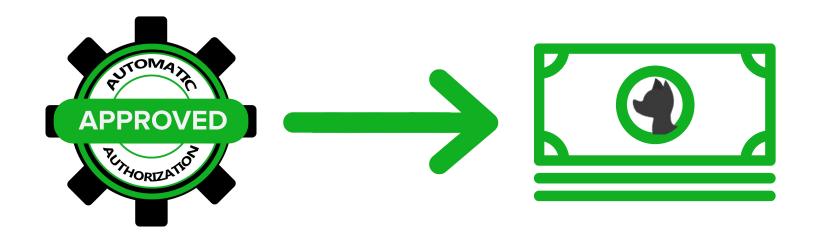
Employer may remove physician's ability to provide treatment that is exempt from UR.





Bill Payment Due for Automatic Authorization

Even if Doctor's First Report of Injury and /or RFA not timely submitted.







§9792.6. Utilization Review Standards -Definitions - On or After January 1, 2013

(a) "Authorization" means assurance that appropriate reimbursement will be made for an approved specific course of proposed medical treatment to cure or relieve the effects of the industrial injury pursuant to section 4600 of the Labor Code

Approve = Authorization



Utilization Review Decision

Approve









State of California

Department of Industrial Relations



Labor Law Cal/OSHA - Safety & Health

Workers' Comp

Self Insurance Apprenticeship

Director's Office

Search

Boards

Answers to frequently asked questions about utilization review (UR) for claims administrators

Q. Does sending the requesting physician an approval of an RFA mean that payment must be made for the authorized service?

A. Yes. Authorization means "assurance that appropriate reimbursement" for the treatment specified will be paid. The California Labor Code <u>provides</u> that once an employer (or its insurer or URO) authorizes medical treatment, **that authorization shall not be rescinded or modified for any reason after the medical treatment has been provided based on the authorization, even if the employer later determines the physician was not eligible to treat (e.g. was not an MPN provider)**. Under the <u>UR regulations</u>, treatment is "authorized" when the decision to approve the RFA is communicated to the requesting physician



Post-Treatment Requirements and Deadlines

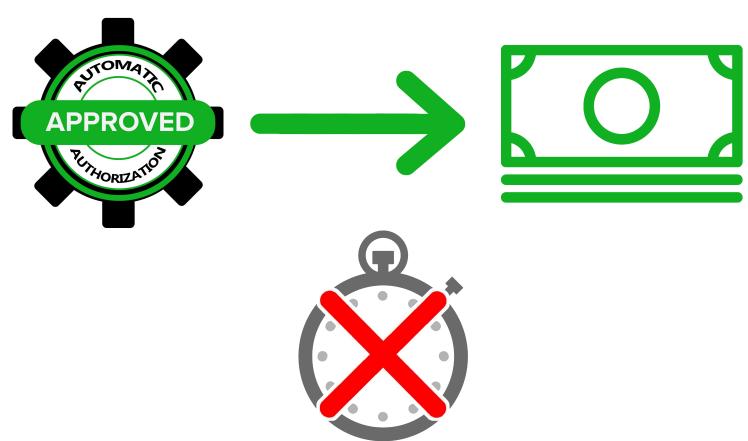
- 1. DLSR 5021, Doctor's First Report of Injury
 - Within 5 days
- 2. Request for Authorization
 - Within 5 days
- Request for Payment
 - Non-Emergency
 - i. Within 30 days
 - Emergency
 - i. Within 180 days





Bill Payment Due For Automatic Authorization

Even if request for payment not timely submitted.







Labor Code

4603.2

Effective:

January 1, 2017

(b)(1)(B) Effective for services provided on or after January 1, 2017, the request for payment with an itemization of services provided and the charge for each service shall be submitted to the employer within 12 months of the date of service or within 12 months of the date of discharge for inpatient facility services. The administrative director shall adopt rules to implement the 12-month limitation period. The rules shall define circumstances that constitute good cause for an exception to the 12-month period, including provisions to address the circumstances of a nonoccupational injury or illness later found to be a compensable injury or illness. The request for payment is barred unless timely submitted.

Timely Bill Submission Within 12 Months of Date of Service

Within 12 months of rendering a service, the provider must submit the bill for services.







Labor Code

4603.2

Effective:

January 1, 2017

(b)(1)(B) Effective for services provided on or after January 1, 2017, the request for payment with an itemization of services provided and the charge for each service shall be submitted to the employer within 12 months of the date of service or within 12 months of the date of discharge for inpatient facility services. The administrative director shall adopt rules to implement the 12-month limitation period. The rules shall define circumstances that constitute good cause for an exception to the 12-month period, including provisions to address the circumstances of a nonoccupational injury or illness later found to be a compensable injury or illness.

The request for payment is barred unless timely submitted.



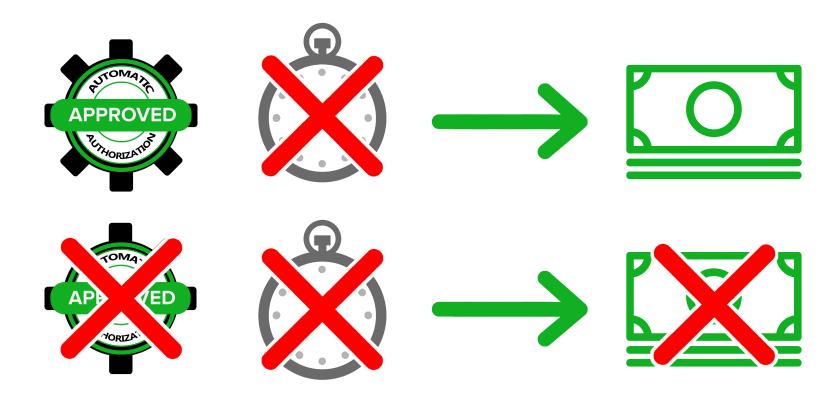
Payment Barred for Untimely Filing

No payment due for untimely bill submissions.



Untimely Bill

Automatically Authorized = Payment Non-Automatically Authorized = No Payment





Post-Treatment Requirements and Deadlines

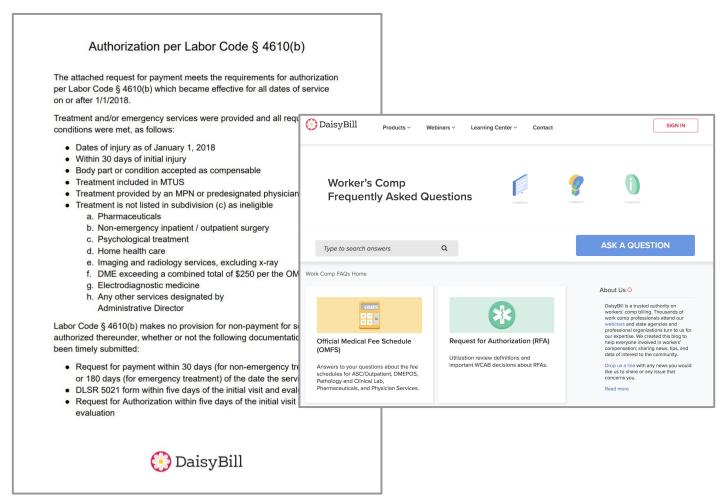
- 1. DLSR 5021, Doctor's First Report of Injury
 - Within 5 days
- 2. Request for Authorization
 - Within 5 days
- Request for Payment
 - Non-Emergency
 - i. Within 30 days
 - Emergency
 - i. Within 180 days





Second Review Appeal

For denied bills, use Second Review to appeal incorrect denials





Today's Topics



E&M Codes Aren't Being Reimbursed
 Properly



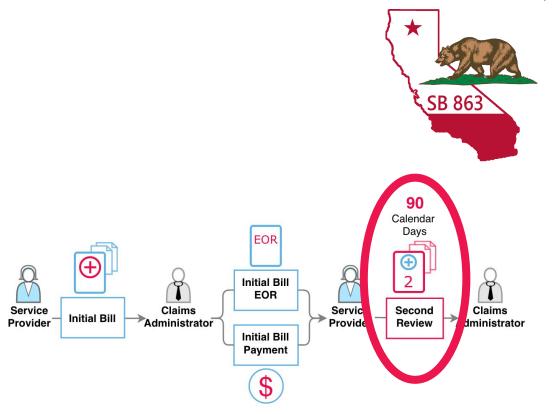
2. Automatic Authorization

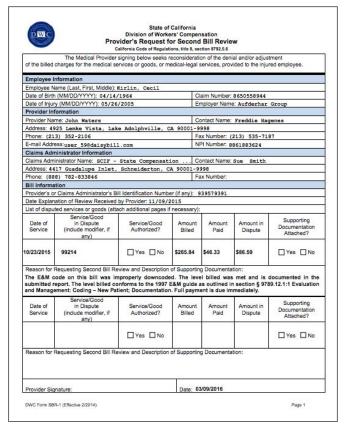


Second Bill Reviews (appeals) are more important than ever



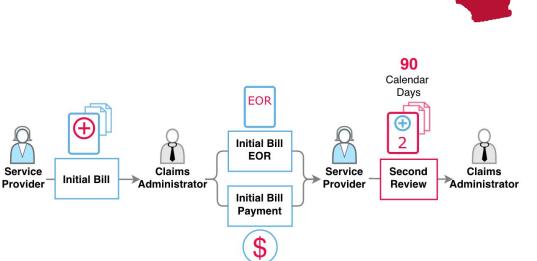
Incorrect Payments Require Second Bill Review (SBR-1 Form)

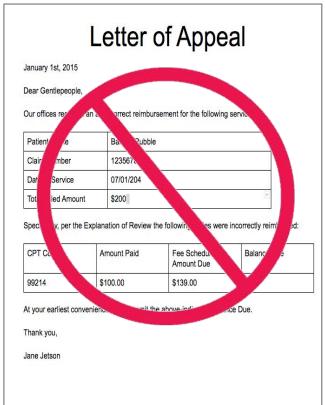






Letter of Appeal / Reconsideration Noncompliant



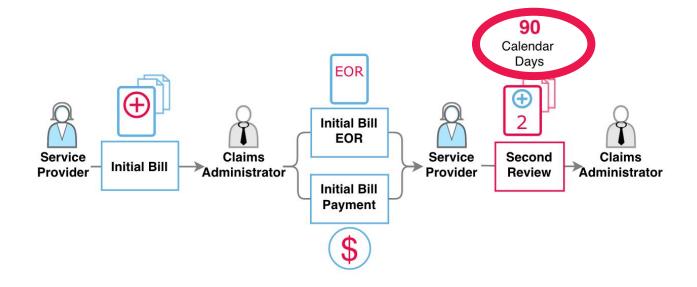




CCR § 9792.5.5 Second Review of Medical Treatment Bill or Medical-Legal Bill

(a) If the provider disputes the amount of payment made by the claims administrator on a bill for medical treatment services or goods rendered on or after January 1, 2013, submitted pursuant to Labor Code section 4603.2, or Labor Code section 4603.4, or bill for medical-legal expenses incurred on or after January 1, 2013, submitted pursuant to Labor Code section 4622, the provider may request the claims administrator to conduct a second review of the bill. (b) The second review must be requested within 90 days of:

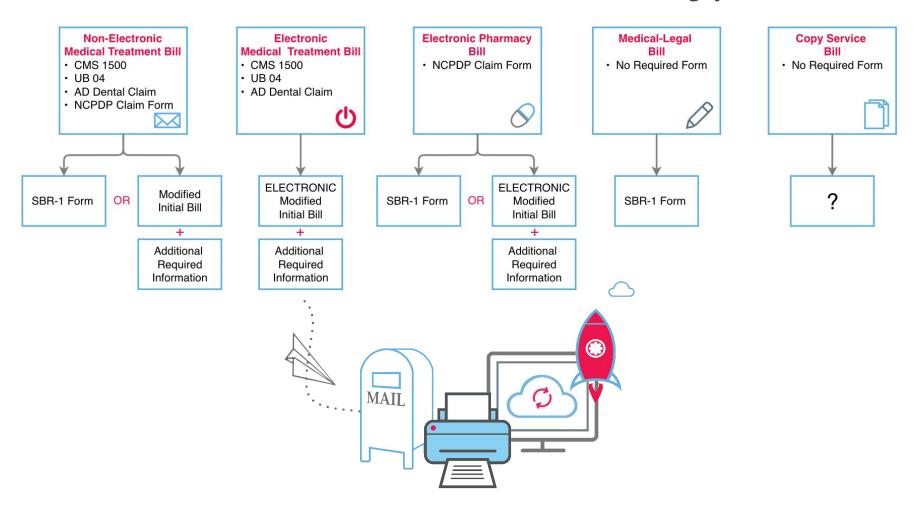
90 Days to Submit Second Review







Second Review Format Depends on Initial Bill Format and Bill Type





CCR § 9792.5.5 Second Review of Medical Treatment Bill or Medical-Legal Bill

- (c) The request for second review shall be made as follows:
- (1) For a non-electronic medical treatment bills, the second review shall be requested on either:
- (A) The initially reviewed bill submitted on a CMS 1500 or UB04, as modified by this subdivision. The second review bill shall be marked using the National Uniform Billing Committee (NUBC) Condition Code Qualifier "BG" followed by NUBC Condition Code "W3" in the field designated for that information to indicate a request for second review, or, for the ADA Dental Claim Form 2006, or ADA Dental Claim Form (2012), the words "Request for Second Review" will be marked in Field 1, or for the NCPDP WC/PC Claim Form, the words "Request for Second Review" may be written on the form



Non-Electronic Medical Treatment Bill

- CMS 1500
- UB 04
- AD Dental Claim
- NCPDP Claim Form

Bill Type	Modified Initial Bill
CMS 1500	Box 10d: BGW3
UB04	Box 18-28: BGW3
ADA Dental Claim Form 2006 or ADA Claim Form 2012	Field 1: Words "Request for Second Review"
NCPDP WC/PC Claim Form	Words: "Request for Second Review"



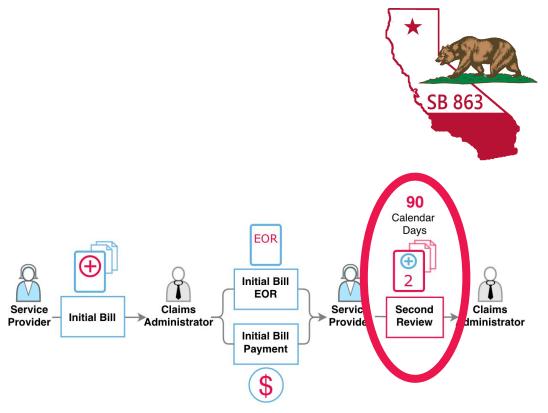


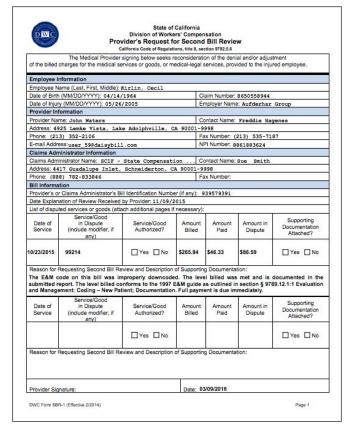






Medical-Legal Bills REQUIRE Second Bill Review (SBR-1 Form)









Make Life Easier: Submit the SBR-1 Form

	c	Division of Works vider's Request f alifornia Code of Regulat	or Second lons, title 8, se	Bill Revie	20 SO	-			
of the hilled	The Medical Provider charges for the medical se								
or the billed	charges for the medical se	avious or goods, or in	edical-legal	services, pro-	nada to trie irija	ed employee.			
Employee I	information								
Employee N	lame (Last, First, Middle): 1	Kirlin, Cecil							
Date of Birth	n (MM/DD/YYYY): 04/14/	1964	C	laim Number:	8650558944				
Date of Injur	ry (MM/DD/YYYY): 05/26	/2005	E	mployer Nam	e: Aufderhar	Group			
Provider In	formation		1000			1500-1600			
Provider Na	me: John Waters		0	ontact Name:	Freddie Hag	renes			
Address: 49	925 Lemke Vista, Lak	e Adolphville, C	A 90001-9	998					
Phone: (21	3) 352-2106		F	ax Number: ((213) 535-71	37			
E-mail Addr	ess:user_59@daisybill	1.com	N	PI Number: 8	861883624				
Claims Adr	ministrator Information		-77-32						
Claims Adm	inistrator Name: SCIF -	State Compensat	ion C	ontact Name:	Sue Smith				
Address: 44	17 Guadalupe Inlet,	Schneiderton, C	A 90001-9	998					
Phone: (88	18) 782-833846		F	ax Number:					
Bill Informa	ation								
Provider's o	r Claims Administrator's Bi	III Identification Numb	er (if any): 9	939579391					
Date Explan	nation of Review Received	by Provider: 11/09/2	2015				111		
List of dispu	ited services or goods (atta	ach additional pages it	necessary):					-	
Date of Service	Service/Good in Dispute (include modifier, if any)	Service/Good Authorized?	Amount Billed	Amount Paid	Amount in Dispute	Sur			
10/23/2015	99214	Yes No	\$265.84	\$46.33	\$86.59	□Yes L			
The E&M o	Requesting Second Bill Re code on this bill was in report. The level billed co ement: Coding - New Pat Service/Good in Dispute (include modifier, if	nproperly downcode	ed. The leve E&M guide	el billed was as outlined i	s met and is on section § 978				
	any)	Yes No	125	.5>	2				



IMPORTANT: Reason for Requesting Second Bill Review



State of California Division of Workers' Compensation Provider's Request for Second Bill Review

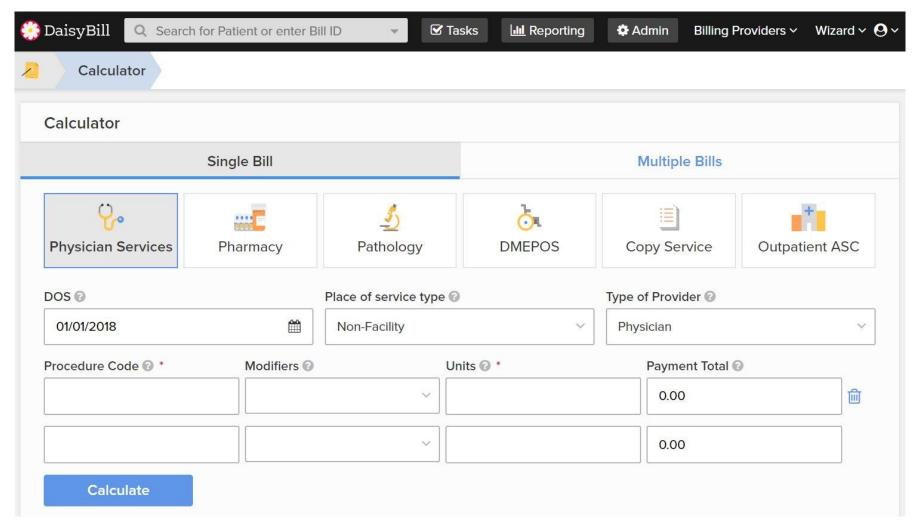
California Code of Regulations, title 8, section 9792.5.6

The Medical Provider signing below seeks reconsideration of the denial and/or adjustment of the billed charges for the medical services or goods, or medical-legal services, provided to the injured employee.

Date of Service	Service/Good in Dispute (include modifier, if any)	Service/Good Authorized?	Amount Billed	Amount Paid	Amount in Dispute	Supporting Documentation Attached?
		Yes No				Yes No
Reason for F	Requesting Second Bill Re	view and Description	of Supporting	Documenta	tion:	



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2017 Days to Payment

Electronic Billing Means FAST Payment

Claims Administrator Name	Business Days to Payment Average
Sedgwick Claims Management Services	10
State Compensation Insurance Fund	8
Gallagher Bassett	8
Liberty Mutual Insurance	6
York Risk Services Group	16
Zurich Insurance North America	21
CorVel	13
Tristar Risk Management	17
Travelers	10
AmTrust North America	15
The Hartford	11
ESIS, Inc.	12
Berkshire Hathaway Homestate Companies	10
The Zenith	8
Intercare Holdings Insurance, Inc.	13





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