



AMERICAN COLLEGE OF
OCCUPATIONAL AND
ENVIRONMENTAL MEDICINE

July 31, 2026

Paul Taurello, Esq
Director, Colorado Division of Workers' Compensation
707 17th Street, Suite 2300
Denver, CO 80202

Dear Mr. Taurello:

Given the breadth of the proposed revisions and the concerns raised by practicing Colorado-based occupational medicine physicians, the American College of Occupational and Environmental Medicine (ACOEM) strongly recommends that the Division rescind the current redlined proposal and work to further refine proposed rules through a deliberate, transparent, and collaborative stakeholder process before final adoption.

Specifically, ACOEM encourages the Division to:

- Clearly identify substantive policy changes through a redlined draft or comparable comparison document;
- Provide stakeholders with the aims and substantiation of the policy and workflow changes;
- Provide stakeholders with an adequate opportunity to review and comment on those changes;
- Engage occupational medicine physicians, employers, labor representatives, payers, and injured workers in the rulemaking process; and
- Carefully evaluate revisions that preserve timely physician evaluation, meaningful clinical accountability, and appropriate physician reassessment during an injured worker's recovery.

ACOEM supports thoughtful modernization of Colorado's workers' compensation system and recognizes the Division's commitment to improving efficiency and evidence-based care. Given the scope of the proposed revisions and their potential impact on patient care, stakeholder engagement will strengthen both the final regulations and confidence in the rulemaking process.

For these reasons, ACOEM requests that the Division rescind the current proposed version and develop a clearer proposal which will enable stakeholders to have the opportunity to fully evaluate the substantive changes and provide input. We believe this collaborative approach will produce stronger regulations that better serve Colorado's injured workers while advancing the Division's goals of modernization, evidence-based care, administrative efficiency, and safe return to work.

If you have any questions, please reach out to me at president@acoem.org.

Sincerely,

Jill Rosenthal, MD, MPH, MA, MSQM, FACOEM
President