



California

NORMML®

California Chapter of the National Organization for the Reform of Marijuana Laws
2261 Market St. #278A, S.F., CA 94114 - www.canorml.org - (415) 563-5858 / (510) 540-1066
LA Office: (310) 652-8654

March 12, 2025

Maureen Gray
Dept. of Industrial Relations
Division of Workers' Compensation
1515 Clay St 18th Floor
Oakland, CA 94612

Dear Ms. Gray:

I have grave concerns about California adopting Cannabis Regulation (Sec. 9792.24.8) as recommended by the American College of Occupation and Environmental Medicine.

It didn't take much digging to uncover disturbing connections between the ACOEM and the worker's compensation insurance industry. For example, ACOEM's current Vice President Jill Rosenthal works at [Zenith Insurance](#), a worker's compensation insurance provider. Also, the organization offers a "comprehensive [professional liability insurance program](#)" from [Professional Risk Solutions/One 80](#), which provides workers' compensation insurance for health care workers, and (interestingly) [for the cannabis and hemp industries](#).

Most troubling is that, according to [the organization's website](#), **in 2022 their Mid-Atlantic chapter opposed legislation in New Jersey that would have required workers' compensation carriers to "cover the cost of dispensary-purchased 'medical' [their quotes] cannabis and cannabis-derived products."**

For a supposedly scientific-based organization to take a political stand with obvious benefits to the workers' compensation insurance industry is deeply troubling, especially since their recommendation to California ignored extensive evidence that cannabis is effective in treating chronic pain, as outlined in Cal NORMML's letter to you from our director Dale Gieringer.

ACOEM also offers a course for [Medical Review Officers](#) who review workplace drug tests, and their leadership has ties to that industry also. My biggest fear is that injured Californians will be subjected to drug testing and denied benefits if the ACOEM recommendations are adopted.

Please side with science and injured workers, and not with insurance companies, when you decide whether or not to exclude medical cannabis as an accepted treatment.

Respectfully,

A handwritten signature in red ink that reads "Ellen Komp". The signature is written in a cursive style with a large, looping initial "E".

Ellen Komp
Deputy Director
Cal NORML