



*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 11, 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, and drug testing companies:

- ACOEM's current Vice President Jill Rosenthal works at [Zenith Insurance](#), a worker's compensation insurance provider.
- Their past president Natalie Hartenbaum works for [a Pennsylvania company](#) that provides workplace drug testing. Dr. Hartenbaum sits on ACOEM's Task Force on Cannabis, which put out [a negative workplace position](#) statement regarding cannabis in 2023.
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- Also on their cannabis task force is Dr. [Stephen Frangos](#) of Santa Barbara, who oversaw "medical surveillance programs" at Chevron for 30 years.

Most troubling is that, according to [the organization's website](#), in 2022 their Mid-Atlantic chapter established a "leadership position" in opposition to 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."

The organization's basis for taking this political action was their judgement that medical cannabis was dangerous, using cherry-picked data and prejudicial judgements to support a

position that surely would benefit insurance companies required to provide payments to injured workers.

I could find no record of donations to ACOEM from the insurance industry, but they do offer a “comprehensive [professional liability insurance program](#)” available only to members of ACOEM from the insurance company [Professional Risk Solutions/One 80](#), which also offers workers compensation insurance for health care workers, and (interestingly) [for the cannabis and hemp industries](#).

It’s little wonder that in making their recommendation to your board, the ACOEM ignored extensive evidence that cannabis is effective in treating chronic pain, as outlined in Cal NORML’s letter to you from our director Dale Gieringer.

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 orange ink that reads "Ellen Komp". The signature is fluid and cursive, with the first name "Ellen" and last name "Komp" clearly visible.

Ellen Komp
Deputy Director
Cal NORML