



News & Notes

OSHA and Pennsylvania Alliance for Workplace Safety



The Pennsylvania Department of Labor & Industry’s Bureau of Workers’ Compensation, Indiana University of Pennsylvania, and OSHA formed an alliance to promote safety information and training to workplaces.

The OSHA Alliance Program has been fostering collaborative relationships between groups committed to the safety of workers for many years now. Recently, the program oversaw an alliance among three parties: The U.S. Department of Labor’s OSHA, the Pennsylvania OSHA Consultation Program at Indiana University of Pennsylvania, and the Pennsylvania Department of Labor & Industry’s Bureau of Workers’ Compensation.

The goal of the alliance is to provide workers with the means to stay safe and healthy through information, guidance, and training resources. The new alliance between the parties specifically involves OSHA’s Pennsylvania area offices in Allentown, Harrisburg, and Philadelphia. The partnership will focus on promoting safety and health, particularly emphasizing an understanding of employees’ rights and employers’ responsibilities under the Occupational Safety and Health Act (OSH Act).

Online Submission of Regular Records Requests Coming Soon!

Coming in January 2020, registered users will be able to submit their regular records requests via WCAIS. Required documentation for requests will now simply be provided to the bureau via an upload link within the system. Once a request has been successfully submitted, requestors will receive a confirmation online. Stay tuned for more details via WCAIS or bureau emails.

*Subpoena requests will need to continue to be mailed with proof of service.

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News & Notes is a quarterly publication issued to the Pennsylvania workers’ compensation community by the Bureau of Workers’ Compensation (BWC) and the Workers’ Compensation Office of Adjudication (WCOA). The publication includes articles about the status of affairs in the workers’ compensation community as well as legal updates on significant cases from the Commonwealth Court. Featured is the outstanding article entitled “A View from the Bench,” in which judges from the Pennsylvania Workers’ Compensation Judges Professional Association summarize recent key decisions from the Commonwealth Court that are of interest to the workers’ compensation community.

We trust that stakeholders in the Pennsylvania workers’ compensation system will find this publication interesting and informative, and we invite your input regarding suggested topics for inclusion in future publications. Suggestions may be submitted to RA-LIBWC-NEWS@pa.gov.

- Marianne H. Saylor, Director – Bureau of Workers’ Compensation
- Joseph DeRita, Director – Workers’ Compensation Office of Adjudication

<i>Employer Information Services</i>	<i>Claims Information Services</i>	<i>Hearing Impaired</i>	<i>Email</i>
717-772-3702	toll free inside PA: 800-482-2383 local & outside PA: 717-772-4447	PA Relay 7-1-1	ra-li-bwc-helpline@pa.gov

▼ PATHS Your No-Fee Safety Training Resource

The Pennsylvania Training for Health and Safety (PATHS) program makes safety resources and training more accessible to employers and employees everywhere. Training, offered via webinars, has been presented to individuals in 48 states and eight countries to date. This year to date, 297 webinars were conducted, at no cost to the participants. Our trainers can also travel to your site to present training on a wide variety of topics (conditions apply.) This year to date, 102 on-site trainings were held across the commonwealth. This year to date, participants trained through webinar and on-site trainings is more than 28,000.

If structured, timed training is not right for you, you can still benefit from a wealth of safety resources on our website at www.dli.pa.gov/PATHS. If you would like to participate in a webinar, visit our website and select "Training Calendar" to find a course and register online.

Questions? Give us a call at 717-772-1635, or by email at ra-li-bwc-paths@pa.gov.

▼ Workplace Safety Committee Certification \$750 million and counting

More and more employers are discovering that safety really does pay. Employers who follow Pennsylvania's workplace safety committee requirements and regulations can apply for state certification and receive annual 5 percent discounts on workers' compensation insurance premiums. Application is made through the Pennsylvania Department of Labor & Industry, Bureau of Workers' Compensation, Health & Safety Division.

The basic committee requirements for certification include that a minimum of two employee representatives and two employer representatives meet monthly, and that the committee be in operation and in compliance with requirements for at least six months prior to submitting an application.

More than 12,400 workplace safety committees already certified in Pennsylvania have accumulated more than \$750 million in total savings just from the 5 percent workers' compensation insurance premium discounts. That's money that is being reinvested in expanding businesses along with implementation of further safety and prevention

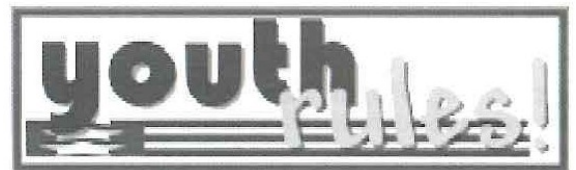
efforts - but it's no longer going toward insurance premiums!

In addition to the 5 percent workers' compensation insurance premium discount, certified workplace safety committees help reduce the employer's cost of workers' compensation insurance by identifying workplace hazards, reducing injuries and reducing claims.

In an increasingly competitive business climate, any opportunity to save money is welcomed. A workplace safety committee not only improves the safety of your operations, but also adds to the bottom line and clearly shows employees that management cares about their well-being. When that's the case, everybody wins.

For more information on setting up a workplace safety committee for your business and to learn more about the program and requirements, visit www.dli.pa.gov/Businesses/Compensation/WC/safety/Pages/default.aspx. You can reach us with questions at 717-772-1635, or by email at ra-li-bwc-safety@pa.gov.

▼ Every year, millions of teens work in part-time or summer jobs that provide great opportunities for learning important life skills and acquiring hands-on experience. Federal and state rules regarding young workers strike a balance between ensuring sufficient time for educational opportunities and allowing appropriate work experiences.



Information about YouthRules! can be found at <https://www.youthrules.dol.gov/>.

For information about the laws administered by the Wage and Hour Division, log on to <https://www.dol.gov/whd/regs/compliance/whdfs43.pdf>, or call the Department of Labor's toll-free helpline at 866-4USWAGE.

▼ Kids' Chance of Pennsylvania Hope, Opportunity and Scholarships for Kids of Injured Workers

At Kids' Chance of Pennsylvania, we're dedicated to helping our kids who need it most - those who need assistance for college or vocational education because a parent was killed or injured in a work-related accident. The hardships created by the death or serious disability of a parent often include financial ones, making it difficult for deserving young people to pursue their educational dreams. That is how Kids' Chance of Pennsylvania continues to make a significant difference in the lives of affected Pennsylvania families by providing scholarship support to help eligible students pursue and achieve their higher educational goals.

Since its inception in 1997, Kids' Chance of PA has awarded scholarships to more than 900 students amounting to more than \$2.2 million in scholarship

assistance. During the 2019-2020 academic year, 57 scholarships were awarded to students, totaling more than \$179,000. The scholarships were made possible due to the generous contributions made by our scholar sponsors, corporate and community partners, and donors. Donations can be made online, by check or through United Way.

Everything our organization does is for the students. Kids' Chance of PA is making a significant difference in the lives of these children, helping them to pursue their educational goals.

For more information about how you can help support Kids' Chance, please contact us at 215-302-3598 or info@kidschanceofpa.org or visit www.kidschanceofpa.org.



Kids' Chance of PA,

"I am really thankful and appreciative for the generous gift of a scholarship that was given to me. I became eligible for the scholarship when my father had an accident at work. It was very detrimental to my whole family. With my father being out of work, the financial burden of continuing my education in college started to soon become a scary thought. This scholarship helped take some of the worry away.

I am currently studying chemistry at Duquesne University, and I couldn't be happier with where I am in life. This scholarship is letting me set my dreams high without having to deeply worry about the financial ends of things. This scholarship is a blessing, and it is helping me become the person I have always wanted to be.

Thank you so much,
Hannah
Duquesne University '22

▼ SAVE THE DATE!!!

The 15th Annual Kids' Chance of PA Golf Outing will be held Sunday, May 31, 2020. Watch for details to follow.



▼ SAVE THE DATE!!! 19th Annual Workers' Compensation Conference

Join us for the 19th Annual Pennsylvania Workers' Compensation Conference, June 1-2, 2020, at the Hershey Lodge & Convention Center, Hershey, Pennsylvania. Nearly 1,400 people registered to attend the 2019 conference, representing employers, case managers, third-party administrators, defense/claimant counsel, labor and others. Attendance at this event promises a sharing of practical, useful, and timely information and provides attendees with the unique opportunity to network with other workers' compensation professionals while renewing valuable contacts. Attendees will also have the opportunity to visit with 125 vendors and learn about their workers' compensation-related goods and services.

Conference registration will not be open until at least the end of January 2020, but in the meantime

you may wish to book your hotel reservations. Reservations for overnight accommodations at the Hershey Lodge must be made by contacting the Hershey Lodge on or before Thursday, May 1, 2020, at 855-729-3108 or visit: <https://book.passkey.com/go/BWCC2020>

When making your reservations, advise the lodge that you are attending the "Bureau of Workers' Compensation Conference, June 1-2, 2020" to get the conference room rate of \$205 per room/per night, plus 11% taxes.

It's a conference you don't want to miss!

Questions?

800-482-2383 (Toll Free Inside PA)

717-772-4447 (Local and Outside PA)

Email: RA-LI-BWC-Helpline@pa.gov

▼ The 2019 Pennsylvania Governor's Occupational Safety and Health Conference was a success!



The Governor's Occupational Safety and Health Conference has been Pennsylvania's premier safety and health event for nine decades. This year they kicked-off their 93rd Annual Conference at the Hershey Lodge in Hershey, Pennsylvania. The annual conference brought together representatives from labor, management, government and education sectors to discuss education, innovation, best practices, new products

and services with regards to safety issues. This year's keynote presenters provided inspiration through lessons on leadership and culture and the general session presentation provided policy updates. The workshops provided attendees with up to date information in areas such as construction safety, occupational safety and health, and new equipment. More than 1,050 safety professionals attended this year to take advantage of the educational and networking opportunities provided at the conference.

▼ International Association of Industrial Accident Boards and Commissions (IAIABC) 105th Convention hosted at the Westin Convention Center in Pittsburgh



Jessica Faust IAIABC, Mistie Snyder BWC, Penny Myers BWC, Lisa Maddas WCAB and Brianna Schumann IAIABC

The IAIABC Convention addresses the current policy, regulatory, and administrative challenges and opportunities affecting workers' compensation around the world through a combination of presentations, discussion forums and roundtables, committee meetings, and social events.

The IAIABC Convention brings together more workers' compensation jurisdictional agency leaders than any other conference in North America.

of

In 2019, more than 325 people attended the IAIABC Convention, including representatives from 34 jurisdictions and eight non-U.S. jurisdictions: Germany, Australia, Indonesia, Russia, Malaysia, Saskatchewan, Taiwan and the Mashantucket Pequot Tribal Nation.

Attendees of the IAIABC Convention included: jurisdictional regulators and administrators; government/regulatory affairs personnel; medical directors; insurers; claims administrators; attorneys; service providers; medical providers; and administrative law judges.

▼ Judge David B. Torrey Received the IAIABC President's Award 2019



Judge David B. Torrey and
IAIABC President Abbie Hudgens

On October 23, Judge David B. Torrey was given the IAIABC President's Award 2019 by the Honorable Abbie Hudgens, IAIABC President and Administrator of the Tennessee Bureau of

Workers' Compensation.

The President's Award is given by a personal selection by the IAIABC president in recognition of ongoing support and engagement in the IAIABC

and its efforts to improve workers' compensation systems around the world.

The award was given in recognition of Judge Torrey's dedicated scholarship of workers' compensation law, which deepens knowledge and understanding of systems around the world. Judge Torrey was commended on his quarterly Pennsylvania workers' compensation newsletter and his contributions to and editing of *Lex & Verum*, the monthly periodical of the National Association of Workers' Compensation Judiciary.

▼ Scott G. Weiant Elected to IAIABC Board of Directors



Scott G. Weiant

On Thursday, October 24, members of the IAIABC elected Scott G. Weiant, Deputy Secretary for Compensation and Insurance to the 2019-2020 Board of Directors.

The IAIABC Board of Directors is the governing body of the IAIABC. It sets the vision, mission, and

strategic direction of the association. The Board of Directors is comprised of leaders from 13 jurisdictional agencies and two ex-officio members.

Founded in 1914, the IAIABC is a not-for-profit association representing most of the government agencies charged with the administration of workers' compensation systems throughout the United States, Canada, and other nations and territories as well as other workers' compensation professionals in the private sector. Its' mission is to advance the efficiency and effectiveness of workers' compensation systems throughout the world.

▼ Important Impairment Rating Evaluation Notice

Did you know that the only valid version of LIBC-765 is available through WCAIS?

To obtain a valid LIBC-765, insurers must enter the appointment details for the IRE appointment in WCAIS. Effective Sept. 27, 2019 through WCAIS update 3.5, stakeholders now have the ability to select where the IRE examination will take place

during the submission of the LIBC-765. WCAIS generates a printable version of the LIBC-765 for insurers and/or their counsel to serve the appropriate parties and provide information to the bureau necessary for oversight and reporting efforts.

▼ A View from the Bench

Bristol Borough v. WCAB (Burnett)

On Sept. 10, 2019, the Supreme Court denied the employer's petition for allowance of appeal from the Commonwealth Court's March 22, 2019 decision. In that case, the Commonwealth Court held that a volunteer firefighter met the reporting requirements for a cancer claim under Sections 108(r) and 310(f) of the Act, through the PennFIRS documentation. The PennFIRS documentation is

not required to include information on every carcinogen to which a firefighter is exposed at every fire, but rather documents the firefighter's participation in the fire and exposure to fire smoke, soot and other hazardous substances.

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A View from the Bench

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Kenney v. WCAB, No. 845 C.D. 2018, Aug. 2, 2019

In *Kenney v. WCAB*, the Commonwealth Court held that an employer is not entitled to subrogation against Heart and Lung Act benefits for payments made to a claimant pursuant to Sections 1720 and 1722 of the Motor Vehicle Financial Responsibility Law, even when workers' compensation benefits are turned over to the employer from a group self-insurance fund.

The claimant, a police officer for Lower Pottsgrove Township, was injured in a motor vehicle accident. He initially received workers' compensation benefits paid by the Delaware Valley Workers' Compensation Trust (trust), a group self-insurance fund. After his injury, the trust issued a notice of compensation payable, accepting responsibility for the injury and liability for wage loss compensation. The employer continued to pay the claimant his full salary, so the trust mailed the checks to the employer, and the claimant endorsed them over to the employer. Subsequently, the claimant applied for Heart and Lung Act benefits, and the employer acknowledged and accepted the claim under the Heart and Lung Act. The claimant then filed a third-party suit against the driver of the vehicle involved in the accident. The trust asserted a workers' compensation lien. The employer filed two petitions to review compensation benefits, seeking a determination with respect to its lien rights against any future recovery and a determination as to whether benefits were properly paid under the Workers' Compensation Act.

During the course of the litigation on the review petitions, there was testimony on the exact nature of the trust. The parties agreed that the trust acts as an insurer for the municipality, and that the employer was not a stand-alone self-insurer but rather was a member of a self-insurance fund. The WCJ found that the claimant would not be able to assert the benefits received as damages in the suit and denied subrogation under *Stermel v. Workers' Compensation Appeal Board (City of Philadelphia)*, 103 A.3d 876 (Pa. Cmwlth. 2014).

The employer appealed to the board, arguing that the case was distinguishable from *Stermel* because this employer had "all of the attributes of an insured employer and none of the attributes of a self-insured." On that basis, the WCAB reversed and granted subrogation.

Relying on *Stermel* and *Bushta*, the Commonwealth Court reversed the WCAB and reinstated the WCJ's decision denying subrogation. It explained that the

claimant did not actually collect any workers' compensation benefits, only Heart and Lung Act benefits. It found it to be irrelevant that the trust paid workers' compensation benefits to the employer, explaining that it is the nature of the benefits for which subrogation is sought that is critical, not who is paying those benefits or whether the benefits are being paid from a separate account. Because the benefits collected by the claimant were Heart and Lung Act benefits, it found that there can be no subrogation of those benefits.

In *Peters v. WCAB (Cintas Corporation)*, ___ A.3d ___ (Pa. Cmwlth. 2019), a divided Commonwealth Court held a traveling employee was acting outside the course of his employment when he sustained injuries in a vehicular accident on his way home after attending a happy hour celebration with co-workers. Claimant, Jonathan Peters, was a traveling salesman for employer, Cintas. On the day of the accident, claimant drove to a restaurant after working a full day to attend an event with co-workers. He drove past his home on the way to the restaurant. Claimant's injuries were sustained in a vehicular accident while driving home from the restaurant. Employer denied liability and claimant filed a claim petition. The WCJ denied claimant's claim petition, finding claimant's voluntary attendance at the event was not in furtherance of employer's interests; rather, the event was merely a social gathering. The WCAB affirmed, and claimant appealed to Commonwealth Court. At the outset, the court acknowledged traveling employees are entitled to a presumption they are in the course and scope of employment when traveling to and from work. To rebut the presumption, an employer must establish the claimant's actions at the time of injury were "so foreign to and removed from" his usual employment that those actions constituted abandonment of employment. Acknowledging that homeward travel and its associated hazards are considered a necessary part of business excursions, the court focused on the fact claimant drove past his home when traveling to the event. Under these facts, reasoned the court, claimant's homeward trip ended when he passed home. Claimant could have avoided the additional hazards of travel by simply going straight home and forgoing the voluntary event. Two dissenting judges felt the injury was compensable a matter of law because claimant was in furtherance of his employment. Here, employer invited claimant to the event, employer organized and paid for the event, employer regularly held similar events during sales promotions, and the event occurred at

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A View from the Bench

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the end of claimant's workday. Under the majority's reasoning, noted the dissent, claimant's injuries would have been compensable if the restaurant was geographically situated between claimant's last sales call and his home. A concurring judge felt that the location of the event was irrelevant because the WCJ found claimant's attendance at the event was voluntary and not work-related.

In *Sadler v WCAB (Philadelphia Coca-Cola, 210 A.3d 372 (Pa. Cmwlth. 2019)*, a three judge panel in the Commonwealth Court addressed two issues. First, under Section 309 (d.2) of the Workers' Compensation Act, regarding expected earnings, when the credited testimony confirms that overtime will likely be required, and indeed the documentary evidence shows that overtime was actually worked, can the WCJ rely solely on testimony from the employer that the standard work week was limited to 40 hours in excluding the overtime from the average weekly wage calculation? Second, where claimant is incarcerated after an arrest, fails to post bail and is later convicted and sentenced to time served, is employer entitled to a suspension of indemnity benefits during the period of incarceration?

With respect to the Section 309 (d.2) issue, claimant worked less than 13 weeks. He testified to substantial overtime of approximately 20 hours per week. Employer testified that the standard work week was four 10 hour days for a total of 40 hours per week, but also testified that during the summer months overtime was generally required up to six 10 hour days for a total of 60 hours per week. In addition, the actual wage records demonstrated three weeks with overtime, one totaling over 62 hours and only 10 hours the week claimant was injured.

The WCJ found claimant not credible and employer credible and used employer's testimony that the standard work week was a 40 hour workweek without considering employer's testimony that overtime was likely and expected and the actual wage data showing claimant actually worked substantial overtime before his injury.

On appeal, the WCAB affirmed. In the majority opinion, the Commonwealth Court, citing *Hannaberry*, vacated and reversed, based on economic reality of the hours worked, employers' testimony that overtime was available and expected, and finally the humanitarian purposes of the Workers' Compensation Act. Simply stated,

overtime must be considered when it is part of the expectation.

With regard to the incarceration issue, after his injury, claimant was arrested, and as he was unable to post bail, remained incarcerated through the final disposition of his criminal case some 525 days later, when he pled guilty. Following the guilty plea, claimant was sentenced to 525 days of incarceration but was given credit for the pre-incarceration time served. After the sentence was handed down, the employer filed a suspension petition requesting a suspension during the period of incarceration. The WCJ granted the suspension and directed the employer to file against the Supersedeas Fund for reimbursement. On appeal the WCAB affirmed but directed the employer to utilize the 525 day credit against claimant's ongoing benefits.

On further appeal, the Commonwealth Court reversed, finding the statutory language under Section 306(a.1) had to be narrowly construed and could only apply to periods of incarceration that occurred **after** the conviction. The court cited *Harmon v. Unemployment Compensation Board of Review*, 207 A.3d 292 (Pa. 2019). In *Harmon*, the court noted that the unemployment compensation section on denying benefits to an incarcerated individual has essentially the same language as section 306(a.1) of the Workers' Compensation Act. In *Harmon*, the out-of-work individual was serving a weekend sentence only. He was "available" to work during the normal workweek. The agency, referee, UCBR, and Commonwealth Court all denied UC benefits. The Supreme Court reversed and awarded benefits. The Supreme Court stated that its reading was consistent with the remedial purposes of the UC Law and the Supreme Court's prior pronouncement that disqualification provisions "should be narrowly construed and a claimant must not be denied compensation unless he is unequivocally excluded by the plain language of these provisions."

The Commonwealth Court stated that it was not free to engraft language into the statute, and that if the legislature had intended that benefits be discontinued for an incarcerated recipient **prior** to conviction, it would have written the statute to achieve that result.

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A View from the Bench

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The court also noted that in this instance to grant the suspension would penalize the claimant for not being able to post bail, and that as a result could lead to two similarly situated claimants receiving differing treatment under the Workers' Compensation Act based on the ability to post bail, rather than their work-related injuries.

The court reversed the granting of the suspension petition, and remanded the matter to the WCJ for a recalculation of claimant's AWW, taking into account that claimant was expected to work overtime during the summer, and, thereafter, a determination of whether claimant is entitled to an award of penalties.

***Workers' First Pharmacy Services, LLC v. Bureau of Workers' Compensation Fee Review Hearing Office (Cincinnati Insurance Company)*, ___ A.3d ___, 2019 WL 3642982 (Pa. Commw. 2019).**

In a 2019 case, the fee review hearing officer (FRHO) was held to have committed error in concluding that she had no jurisdiction over a fee review dispute once the parties had engaged in a collateral C&R agreement in which the employer denied all liability for any work injury. The case stands for the proposition that the parties cannot seek to settle out from under the interests of a known medical provider, particularly when the injured worker has been told that he or she will have no liability for the provider's bills.

A worker, Martinez, was employed by American Business Support. He claimed a 2016 injury, sustained while moving a cabinet. Employer filed a denial, and claimant thereupon filed a claim petition. Claimant, meanwhile, had treated with a physician who prescribed compound creams. Employer denied payment on all three invoices for the compound creams "for the stated reason that claimant did not sustain an injury." In response, Workers First Pharmacy, the enterprise supplying the agents, filed applications for fee review. The BWC Medical Fee Section denied the applications as premature. At that point, the employer requested a hearing from the FRHO to contest all three fee review

determinations. In its request, employer asserted that the Medical Fee Review Section lacked, at the outset, jurisdiction over the pharmacy's applications "because the employer had no liability for claimant's injury."

The FRHO, understanding that the underlying case might be subject to C&R, stayed the proceedings. Within weeks, employer and claimant entered into a C&R. Under the agreement, employer denied all liability but provided claimant with \$37,500.00 in a lump sum. The C&R agreement featured an elaborate clause providing that employer would *not* be liable for medical benefits. However, this provision featured both employer and claimant acknowledging that litigation (the fee review) was pending over the compound creams. The release stated, among other things, "those limited outstanding bills are separate, distinct, and are not part of this otherwise global resolution.... That is..., the fee review ... shall continue. The instant [C&R] agreement does not resolve that issue nor will the claimant be responsible for any payments to [pharmacy] pursuant to the separate fee review litigation...."

After the WCJ approved the C&R, employer told the pharmacy that the fee review proceeding was moot and there was "no reason to move forward" with the same. The provider disagreed, but the FRHO vacated the Fee Review Section determination "and held that pharmacy's fee review applications were premature." This was so because the employer had denied liability at the outset and in the approved C&R. The Commonwealth Court, however, vacated and remanded to the FRHO. The court noted that, at the C&R hearing, claimant came to the understanding (via questioning) that "if it's deemed that [Insurer] owes an amount of money [in the fee review] that that will be paid for and you won't be liable for it." As far as the court was concerned, "Employer accepted full liability for the debt to pharmacy. Employer's counsel told claimant that even if employer was found not liable, pharmacy could not hold claimant responsible for the debt. Stated otherwise, employer accepted 'responsibility' for the debt to pharmacy when it released claimant from any obligation to pay pharmacy in the C&R agreement. Accordingly, the hearing office has jurisdiction to decide the three fee review contests."

WORD SEARCH

- ARCTIC
- BARREN
- BITTER
- BLEAK
- BLUSTERY
- CHILLY
- COLD
- COZY
- CRISP
- CRUNCHY
- DEPRESSING
- DRAFTY
- DREARY
- EVERGREEN
- FIREPLACE
- FIRESIDE
- FLAKES
- FLANNEL
- FLEECY
- FLUFFY
- FLURRIES
- FREEZING
- FROST
- FROSTBITTEN
- FROSTY
- FROZEN
- GARLAND
- GLISTENING
- GUSTY
- HOLLY
- HOWLING
- HYPOTHERMIC
- ICICLES
- ICY
- INSULATED
- JINGLE
- MISTLETOE
- NIPPY
- NUMB
- PARKA
- POINSETTIA
- SCARF
- SEDENTARY
- SHIVERING
- SHOVEL
- SLED
- SLEET
- SLIPPERY
- SLUSH
- SNOW
- SPICED
- THAW
- TOASTY
- TOBOGGAN
- WHITE
- WINDY
- WREATH

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 W C U R Y D N I W O Q

*News & Notes is published quarterly by the Bureau of Workers' Compensation
 Forward questions or comments about this newsletter to the Bureau of Workers' Compensation,
 Attn: Margaret T. Day, 1171 South Cameron Street, Harrisburg, PA 17104-2501*

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