COMPLIANCE AUDIT REPORT

STATE OF MAINE WORKERS' COMPENSATION BOARD



Nationwide Mutual Insurance and Affiliates Group Engagement Date: November 7, 2017 Issue Date: February 13, 2019

Office of Monitoring, Audit & Enforcement

John C. Rohde Executive Director

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SUMMARY

Nationwide Mutual Insurance and Affiliates group of companies (collectively Nationwide) provide a wide variety of business insurance products including workers' compensation.

In December 2012 a Nationwide affiliate, Harleysville Worcester Insurance Company, entered into an agreement with the Superintendent of the Maine Bureau of Insurance (Superintendent) and the Office of the Maine Attorney General for the purpose of bringing to a halt, without resort to an adjudicatory proceeding, violations of 39-A M.R.S.A. certified to the Superintendent by the Maine Workers' Compensation Board (Board) pursuant to Title 39-A M.R.S.A. Section 359(2) and confirmed in a subsequent targeted market conduct examination report. The agreement ended in December 2014.

The Audit Division of the Board examined ten (10) claim files where indemnity benefits were paid for the period under examination (2014-2016) as well as fifty-four (54) medical payments for the period under examination (2014-2016) to determine compliance with statutory and regulatory requirements in the following areas:

- > Form filing
- > Timeliness of benefit payments
- > Accuracy of benefit payments

Six (6) claims were handled by Nationwide's independent adjusting firm, Veritas Claims (Veritas), situated in Joliet, Illinois. Nationwide adjusters responsible for payments on claims handled by Veritas are located in Des Moines, Iowa. In addition, Veritas employs the services of Lori L. Lyman of Interstate Adjustment Service, Inc.'s Hampton, New Hampshire office to file all State forms on its behalf. Although presently handled in its Pennsylvania office, until June 30, 2017 Nationwide's Harleysville affiliates (Harleysville) adjusted Maine workers' compensation claims solely in Worcester, Massachusetts. Therefore, the remaining four (4) claims were handled in that office. Harleysville also utilizes the services of Thomas Quartararo, Esq. as its claims agent within the State, although none of the claims under review were adjusted by Attorney Quartararo.

The audit work was conducted as a desk audit.

The compliance tables found on pages 14 through 18 of this report are representative of Board findings as of November 7, 2017. Since that time, the Audit Division has received additional information, missing form filings, form corrections, indemnity payments and adjustments.

Following is a discussion of the aforementioned compliance tables and of the steps taken since November 7, 2017 to rectify identified noncompliance issues. This discussion also includes other significant issues identified by the audit.

♦ Form filing

> Title 39-A M.R.S.A. and the Board Rules and Regulations provide the requirements for reports to the Board:

WCB-1, First Report of Occupational Injury or Disease	39-A M.R.S.A. Section 303,
	Rules & Regs, Ch 8 Section 13,
	Rules & Regs, Ch 3 Section 4
WCB-2, Wage Statement	39-A M.R.S.A. Section 303
WCB-2B, Fringe Benefits Worksheet	39-A M.R.S.A. Section 303
WCB-3, Memorandum of Payment (MOP)	Rules & Regs, Ch 1 Section 1.1,
	Rules & Regs, Ch 1 Section 1.3,
	39-A M.R.S.A. Section 205(7),
	Rules & Regs, Ch 8 Section 12
WCB-4, Discontinuance or Modification of Compensation	Rules & Regs, Ch 8 Section 11,
	Rules & Regs, Ch 8 Section 12
WCB-4A, Consent Between Employer and Employee	Rules & Regs, Ch 8 Section 18
WCB-8, (21 Day) Certificate of Discontinuance or	39-A M.R.S.A. Section 205(9)
Reduction of Compensation	
WCB-9, Notice of Controversy (NOC)	Rules & Regs, Ch 1 Section 1.1,
	Rules & Regs, Ch 3 Section 4
WCB-11, Statement of Compensation Paid	Rules & Regs, Ch 8 Section 1,
	Rules & Regs, Ch 8 Section 12

- Failure to file any Board form within established time frames is a violation of Title 39-A M.R.S.A. Section 360(1) (A) or (B).
- First Report of Occupational Injury or Disease (WCB-1):
 - > Two (2) First Report of Occupational Injury or Disease forms were filed in accordance with the above requirements.
 - Nationwide's compliance rate for First Report of Occupational Injury or Disease filings is 20%, which is below the Board's performance benchmark of 85%.
 - > Seven (7) First Report of Occupational Injury or Disease forms were filed late.
 - > One (1) First Report of Occupational Injury or Disease form was required, but not filed.
 - ➤ Since November 7, 2017, Nationwide submitted that one (1) First Report of Occupational Injury or Disease form.
- ➤ Wage Statement (WCB-2) and Fringe Benefits Worksheet (WCB-2B):
 - > Five (5) Wage Statements and five (5) Fringe Benefits Worksheets were filed in accordance with the above requirements.
 - > Four (4) Wage Statements and three (3) Fringe Benefits Worksheets were filed late.

- ➤ One (1) Wage Statement and two (2) Fringe Benefits Worksheets were required, but not filed.
 - ➤ Since November 7, 2017, Nationwide submitted that one (1) Wage Statement and those two (2) Fringe Benefits Worksheets.
- ➤ Memorandum of Payment (WCB-3 or WCB-4A) and Notice of Controversy (WCB-9):
 - > Six (6) Memorandum of Payment forms and zero (0) Notice of Controversy ("lost time") forms were filed in accordance with the above requirements.
 - ➤ Nationwide's compliance rate for Memorandum of Payment filings is 50%, which is below the Board's performance benchmark of 85%.
 - Nationwide's compliance rate for Notice of Controversy filings is 0%, which is below the Board's performance benchmark of 90%.
 - Four (4) Memorandum of Payment forms and two (2) Notice of Controversy ("lost time") forms were filed late.
 - > Two (2) Memorandum of Payment forms were required, but not filed.
 - ➤ Since November 7, 2017, Nationwide submitted those two (2) Memorandum of Payment forms.
- ➤ Discontinuance or Modification of Compensation (WCB-4 or WCB-4A):
 - Two (2) Discontinuance or Modification of Compensation forms were filed in accordance with the above requirements.
 - ➤ One (1) Consent Between Employer and Employee (WCB-4A) form was filed in lieu of a WCB-4.
 - > Two (2) Discontinuance or Modification of Compensation forms were filed late.
- ➤ (21 Day) Certificate of Discontinuance or Reduction of Compensation (WCB-8 or WCB-4A):
 - ➤ Three (3) (21 Day) Certificate of Discontinuance or Reduction of Compensation forms were filed in accordance with the above requirements.
 - ➤ One (1) (21 Day) Certificate of Discontinuance or Reduction of Compensation form was improperly filed.
 - > Two (2) (21 Day) Certificate of Discontinuance or Reduction of Compensation forms were required, but not filed.
 - ➤ Since November 7, 2017, Nationwide submitted one (1) Consent Between Employer and Employee form and one (1) Discontinuance or Modification of Compensation form in response to our request for these filings.

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- > Statement of Compensation Paid (WCB-11):
 - > Seven (7) Statement of Compensation Paid forms were filed in accordance with the above requirements.
 - Eleven (11) Statement of Compensation Paid forms were required, but not filed.
 - ➤ Since November 7, 2017, Nationwide submitted two (2) of those Statement of Compensation Paid forms.

♦ Timeliness of benefit payments

- ➤ Title 39-A M.R.S.A. Section 205(2) provides the time requirements for indemnity payments.
- ➤ When there is not an ongoing dispute, failure to pay weekly compensation benefits or accrued weekly benefits within 30 days after becoming due and payable is a violation of Title 39-A M.R.S.A. Section 205(2) and subject to penalty under Section 205(3).

➤ Initial Indemnity Payments:

- ➤ Three (3) initial indemnity payments were made timely and one (1) claim received "salary continuation" from the employer.
 - Nationwide's compliance rate for initial indemnity payments (timely payments and "salary continuation" collectively) is 33%, which is below the Board's performance benchmark of 87%.
- Eight (8) initial indemnity payments were made late.
 - ➤ One (1) late initial indemnity payment was made later than 30 days after it became due and payable, in violation of Section 205(2) and subject to penalty under Section 205(3).

> Subsequent Indemnity Payments:

- Fifty-one (51) subsequent indemnity payments were made timely.
- Forty-seven (47) subsequent indemnity payments were made late.
 - > Two (2) late subsequent indemnity payments were made later than 30 days after they became due and payable in violation of Section 205(2) and subject to penalty under Section 205(3).
- ➤ Board Rules and Regulations Chapter 5 states in part, "The employer/insurer shall pay the health care provider's charge or the maximum allowable payment under this fee schedule, whichever is less, within 30 days of receipt of a bill unless the bill or previous bills from the same provider or the underlying injury has been controverted or denied. If an employer/insurer controverts whether a health care provider's bill is reasonable and proper under § 206 of the Act, the employer/insurer shall send a copy of the notice of controversy to the health care provider."
 - Fifty-two (52) medical payments were made timely.
 - > Two (2) medical payments were made late.
- ➤ Title 39-A M.R.S.A. Section 324(1) provides the requirements for compensation payments per an approved agreement, order or decision. Board Rules and Regulations Chapter 8, Section 18.2 provides the requirements for compensation payments per a Consent Between Employer and Employee (WCB-4A).
 - ➤ One (1) Consent Between Employer and Employee and one (1) decision were paid timely.

♦ Accuracy of indemnity payments

- ➤ Title 39-A M.R.S.A. Section 102(4) and Board Rules and Regulations Chapter 1, Section 5 provide the requirements for calculating average weekly wages (AWWs). Title 39-A M.R.S.A. Section 102(1) and Board Rules and Regulations Chapter 8, Section 9 provides the requirements for determining weekly compensation rates (WCRs). Title 39-A M.R.S.A. Sections 212, 213, and 215 provide the requirements for compensation for total incapacity, partial incapacity, and death benefits.
- The accuracy of indemnity payments was reviewed for ten (10) claims.
- > Average Weekly Wage:
 - > Seven (7) AWWs were correct.
 - ➤ Three (3) AWWs were incorrect.
- ➤ Weekly Compensation Rate:
 - > Seven (7) WCRs were correct.
 - ➤ Three (3) WCRs were incorrect.
- > Amount Paid:
 - > Three (3) claims were compensated correctly.
 - Three (3) claims were underpaid (\$2,127.08 aggregately).
 - > Since November 7, 2017, Nationwide paid the amounts due.
 - Four (4) claims were overpaid (\$5,852.73 aggregately).
 - ➤ Collectively, the aforementioned errors resulted in a net overpayment of \$3,725.65 to injured workers.

♦ Accuracy of medical payments

- ➤ Title 39-A M.R.S.A. Section 209-A and Board Rules and Regulations Chapter 5, provide the fee setting requirements for medical and ancillary services and products rendered by individual health care practitioners and health care facilities.
- > The accuracy of medical payments was reviewed for eight (8) claims.
- > Amount Paid:
 - ➤ Medical payments sampled for six (6) claims were correct.
 - > Medical payments sampled for two (2) claims were incorrect.

♦ Other significant issues

- ➤ Box 22 (First Day Of Compensability After Waiting Period Is Met) of the WCB-3, Memorandum of Payment (MOP) must accurately reflect the date of the first compensable day that follows the completion of the 7-day waiting period. See the Board's Forms and Petitions Manual.
 - ➤ Incorrect dates were reported in Box 22 of the MOPs that were filed for four (4) claims.
- ➤ Box 24 (Date Check Mailed) of the WCB-3, Memorandum of Payment (MOP) must accurately reflect the date that the initial indemnity payment (for the incapacity addressed by the MOP) is sent to the employee. See the Board's Forms and Petitions Manual.
 - ➤ Incorrect dates were reported in Box 24 of the MOPs that were filed for five (5) claims.
- Maine Law (Section 205(2)) mandates that "...Subsequent incapacity payments must be made weekly and in a timely fashion..."
 - Nationwide repeatedly failed to make indemnity payments on a weekly basis for five (5) claims.

PENALTIES

♦ Penalties payable to providers and/or injured employees

Title 39-A M.R.S.A. Section 205(3)

"When there is not an ongoing dispute, if weekly compensation benefits or accrued weekly benefits are not paid within thirty (30) days after becoming due and payable, \$50 per day must be added and paid to the worker for each day over thirty (30) days in which the benefits are not paid. Not more than \$1,500 in total may be added pursuant to this subsection. For purposes of ratemaking, daily charges paid under this subsection do not constitute elements of loss."

A delay of an initial indemnity payment, subject to penalty under Section 205(3), was found on the following claim:

CLAIM	PENALTY JUSTIFICATION	PENALTY EXPOSURE
Justice Gilbert vs. Camp Vega Corporation Date of Injury: 6/18/16 Date ER Notified of Incapacity: 6/20/16 Claim #385134 Board #16013721	No NOC was filed, and the initial indemnity payment was made 8/16/16, which was 43 days after compensation became due and payable (7/4/16).	\$650.00
Total Penalties to Injured Employees for Delays of Initial Indemnity Payments		\$650.00

Delays of subsequent indemnity payments, subject to penalty under Section 205(3), were found on the following claims:

CLAIM	PENALTY JUSTIFICATION	PENALTY EXPOSURE
Hannah Arakelian vs. Camp Vega Corporation Date of Injury: 7/29/15 Date ER Notified of Incapacity: 4/9/16 Claim #366756	A subsequent indemnity payment was made 11/15/16, which was 217 days after the previous indemnity payment (4/12/16).	\$1,500.00*
Jason Martin vs. Tasman Industries, Inc. Date of Injury: 5/9/16 Date ER Notified of Incapacity: 6/30/16 Claim #385112 Board #16013494	A subsequent indemnity payment was made 1/30/17, which was 133 days after the previous indemnity payment (9/19/16).	\$1,500.00**
Total Penalties to Injured Employees for Delays of Subsequent Indemnity Payments		\$3,000.00

^{*} This claim has been settled by Lump Sum and the Audit Division is not pursuing penalties (on behalf of the corresponding employee) arising from the violation cited.

** Paid.

Delays of "other" indemnity payments, subject to penalty under Section 205(3), were found on the following claims:

CLAIM	PENALTY JUSTIFICATION	PENALTY EXPOSURE
Hannah Arakelian vs. Camp Vega Corporation Date of Injury: 7/29/15 Date ER Notified of Incapacity: 4/9/16 Claim #366756 Board #15015553	The claimant's benefits were improperly reduced on 12/3/15. Payment of accrued benefits was made 12/5/18, which was 1,084 days after compensation became due and payable (12/17/15)	\$1,500.00*
Phillip Billington vs. Feed Commodities International Date of Injury: 9/13/16 Date ER Notified of Incapacity: 9/14/16 Claim #771717GD Board #16020505	Benefits were not increased to the Maximum Benefit Level effective 7/1/17 until 9/22/17, which was 69 days after compensation became due and payable (7/15/17).	\$1,500.00**
Scott Bryant vs. Damis Holdings, LLC Date of Injury: 5/17/16 Date ER Notified of Incapacity: 5/18/16 Claim #384101 Board #16011784	The claimant was totally incapacitated from 5/17/16 through 6/2/16. Payment for three (3) days of that incapacity (5/17/16, 5/28/16 and 5/29/16) was made 12/5/18, which was 902 days after compensation became due and payable (6/16/16).	\$1,500.00
Justice Gilbert vs. Camp Vega Corporation Date of Injury: 6/18/16 Date ER Notified of Incapacity: 6/20/16 Claim #385134 Board #16013721	The claimant was totally incapacitated from 6/20/16 through 12/22/16. Payment for the periods 6/20/16 through 6/22/16 and 9/10/16 through 12/22/16 has not yet been made.	\$1,500.00***
Zachery Labrecque vs. Hillandale Farms Conn, LLC Date of Injury: 6/22/16 Date ER Notified of Incapacity: 1/30/17 Claim #385241 Board #16013230	The claimant was totally incapacitated from 1/30/17 through 3/31/17. Payment for the period 3/11/17 through 3/31/17 was made 12/5/18, which was 600 days after compensation became due and payable (4/14/17).	\$1,500.00
Mary Merrow vs. Tasman Industries, Inc. Date of Injury: 1/17/17 Date ER Notified of Incapacity: 4/6/17 Claim #597898GE Board #17002300	The claimant was totally incapacitated from 4/6/17 through 10/8/17. Payment for two (2) days of that incapacity (10/7/17 and 10/8/17) was made 12/5/18, which was 409 days after compensation became due and payable (10/22/17).	\$1,500.00
Total Penalties to Injured Employees for Delays of "Other" Indemnity Payments		\$9,000.00

^{*} This claim has been settled by Lump Sum and the Audit Division is not pursuing penalties (on behalf of the corresponding employee) arising from the violation cited.

^{**}Paid.

^{***} This claim has been settled by a CEE and the Audit Division is not pursuing penalties (on behalf of the corresponding employee) arising from the violation cited.

Penalties payable to the State General Fund

Title 39-A M.R.S.A. Section 359(2)

"In addition to any other penalty assessment permitted under this Act, the Board may assess civil penalties not to exceed \$25,000 upon finding, after hearing, that an employer, insurer or 3rd-party administrator for an employer has engaged in a pattern of questionable claims-handling techniques or repeated unreasonably contested claims. The Board shall certify its findings to the Superintendent of Insurance, who shall take appropriate action so as to bring any such practices to a halt. This certification by the Board is exempt from the provisions of the Maine Administrative Procedure Act. The amount of any penalty assessed pursuant to this subsection must be directly related to the severity of the pattern of questionable claims-handling techniques or repeated unreasonably contested claims. All penalties collected pursuant to this subsection shall inure to the benefit of the General Fund. An insurance carrier's payment of any penalty assessed under this section may not be considered an element of loss for the purpose of establishing rates for workers' compensation insurance."

> No action will be taken at this time.

To avoid future penalty referral(s) under Section 359(2) and/or 360(2), Nationwide must take corrective measures to address the following inadequacies:

- Failure to file or timely file forms with the Board
- > Failure to pay or timely pay benefits
- > Failure to pay benefits accurately

Title 39-A M.R.S.A. Section 360(1)(A)

"The Board may assess a civil penalty not to exceed \$100 for each violation on any person: Who fails to file or complete any report or form required by this Act or rules adopted under this Act."

Violations subject to penalty under Section 360(1)(A) were found on the following claims:

Employee	Date of Injury	Forms Not Filed	Penalty Exposure
	7/29/15	WCB-11, Statement of Compensation Paid	\$100.00
	9/13/16	WCB-11, Statement of Compensation Paid	\$100.00
	6/18/16	WCB-11, Statement of Compensation Paid (2)	\$200.00
	12/20/15	WCB-11, Statement of Compensation Paid (2)	\$200.00
	5/9/16	WCB-11, Statement of Compensation Paid (2)	\$200.00
	1/17/17	WCB-11, Statement of Compensation Paid	\$100.00
TOTAL			\$900.00

Title 39-A M.R.S.A. Section 360(1)(B)

"The Board may assess a civil penalty not to exceed \$100 for each violation on any person: Who fails to file or complete such a report or form within the time limits specified in this Act or rules adopted under this Act."

Violations subject to penalty under Section 360(1)(B) were found on the following claims:

Employee	Date of Injury	Forms Filed Late	Penalty Exposure
	7/29/15	WCB-1, Employer's First Report of Occupational Injury or Disease	\$100.00
		WCB-3, Memorandum of Payment (2)	\$200.00
	9/13/16	WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
		WCB-3, Memorandum of Payment	\$100.00
		WCB-4, Discontinuance or Modification of Compensation	\$100.00
		WCB-11, Statement of Compensation Paid	\$100.00
	5/17/16	WCB-1, Employer's First Report of Occupational Injury or Disease	\$100.00
		WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
		WCB-3, Memorandum of Payment	\$100.00
		WCB-4, Discontinuance or Modification of Compensation	\$100.00

	Date of		Penalty
Employee	Injury	Forms Filed Late	Exposure
	6/18/16	WCB-1, Employer's First Report of Occupational Injury or Disease	\$100.00*
	0/10/10	WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
		WCB-3, Memorandum of Payment	\$100.00
	12/20/15	WCB-1, Employer's First Report of Occupational Injury or Disease	\$100.00
		WCB-9, Notice of Controversy	\$100.00
	6/22/16	WCB-1, Employer's First Report of Occupational Injury or Disease	\$100.00
		WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
		WCB-9, Notice of Controversy	\$100.00
		WCB-11, Statement of Compensation Paid	\$100.00
	5/9/16	WCB-1, Employer's First Report of Occupational Injury or Disease	\$100.00*
		WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
		WCB-3, Memorandum of Payment	\$100.00
	7/27/14	WCB-1, Employer's First Report of Occupational Injury or Disease	\$100.00
	7/12/16	WCB-1, Employer's First Report of Occupational Injury or Disease	\$100.00*
TOTAL			\$3,000.00

^{*} Paid AIU.

Title 39-A M.R.S.A. Section 360(2)

"The Board may assess, after hearing, a civil penalty in an amount not to exceed \$1,000 for an individual and \$10,000 for a corporation, partnership or other legal entity for any willful violation of this Act, fraud or intentional misrepresentation. The Board may also require that person to repay any compensation received through a violation of this Act, fraud or intentional misrepresentation or to pay any compensation withheld through a violation of this Act, fraud or misrepresentation, with interest at the rate of 10% per year."

No action will be taken at this time.

To avoid future penalty referral(s) under Section 360(2) and/or 359(2), Nationwide must take corrective measures to address the following inadequacies:

- Failure to file or timely file forms with the Board
- > Failure to pay or timely pay benefits
- > Failure to pay benefits accurately

COMPLIANCE TABLES

♦ Form Filing

A. First Report of Occupational Injury or Disease (WCB-1)

		2014-2016	
		Number Percent	
Received at the Board:			
Filed	Compliant	2	20%
Late		7	70%
Not Filed		1	10%
Total		10	100%

B. Wage Statement (WCB-2)

		2014-2016	
		Number	Percent
Received at the Bo	oard:		
Filed	Compliant	5	50%
Late		4	40%
Not Filed		1	10%
Total		10	100%

C. Fringe Benefits Worksheet (WCB-2B)

		2014-2016	
		Number	Percent
Received at the Board:			
Filed	Compliant	5	50%
Late		3	30%
Not Filed		2	20%
Total		10	100%

D. Memorandum of Payment (WCB-3 or WCB-4A)

		2014-2016	
		Number	Percent
Received at the E	Board:		
Filed	Compliant	6	50%
Late		4	33%
Not Filed		2	17%
Total		12	100%

E. Discontinuance or Modification of Compensation (WCB-4 or WCB-4A)

		2014-2016	
		Number	Percent
Received at t	he Board:		
Filed	Compliant	3	60%
Late		2	40%
Total		5	100%

F. Certificate of Discontinuance or Reduction of Compensation (WCB-8 or WCB-4A)

		2014-2016	
		Number	Percent
Received at the Board:			
Filed	Compliant	3	50%
Improperly Filed		1	17%
Not Filed		2	33%
Total		6	100%

G. Notice of Controversy (WCB-9)

		2014-2016	
		Number	Percent
Received at t	he Board:		
Filed	Compliant	0	0%
Late		2	100%
Total		2	100%

H. Statement of Compensation Paid (WCB-11)

		2014-2016	
		Number	Percent
Received at the Board:			
Filed	Compliant	7	39%
Not Filed		11	61%
Total		18	100%

♦ Timeliness of Benefit Payments

I. Initial Payment of Indemnity Benefits

			2014-2016	
			Number	Percent
Check Is	sued With	nin:		
0-14	Days	Compliant	4	33%
15-44	Days		7	58%
45+	Days		1	9%
Total			12	100%

J. Subsequent Payment of Indemnity Benefits

			2014-2016	
			Number	Percent
Check Issued Within:				
0-7	Days	Compliant	51	52%
8-37	Days		45	46%
38+	Days		2	2%
Total			98	100%

K. Medical Payments

			2014-2016	
			Number	Percent
Check Iss	ued Within	1:		
0-30	Days	Compliant	52	96%
31+	Days		2	4%
Total			54	100%

L. Payment of Approved Agreements, Orders, Decisions

			2014-2016	
			Number	Percent
Check Iss	ued Withii	n:		
0-10	Days	Compliant	2	100%
Total			2	100%

♦ Accuracy of Indemnity Payments

M. Average Weekly Wage

		2014-2016	
		Number Percent	
Calculated:			
Correct	Compliant	7	70%
Incorrect		3	30%
Total		10	100%

N. Weekly Compensation Rate

		2014-2016	
		Number Percent	
Calculated:			
Correct	Compliant	7	70%
Incorrect		3	30%
Total		10	100%

O. Amount Paid

		2014-2016	
		Number	Percent
Calculated:			
Correct	Compliant	3	30%
Underpaid		3	30%
Overpaid		4	40%
Total		10	100%

♦ Accuracy of Medical Payments

P. Amount Paid

		2014-2016	
		Number	Percent
Calculated:			
Correct	Compliant	6	75%
Incorrect		2	25%
Total		8	100%