

**BLBA BULLETIN NO. 15-07**

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Expiration Date: When incorporated in the BLBA-PM

Subject: Deployment of the Office of Workers' Compensation (OWCP) Imaging System (OIS) within the Division of Coal Mine Workers' Compensation (DCMWC).

Background: As outlined in DCMWC Bulletin No. 14-01, titled OWCP Imaging System and issued in January 2014, DCMWC implemented a pilot imaging system in the Charleston District Office using the OIS software. During this pilot, all mail received for new and existing cases was imaged into electronic case files. Existing cases had both a paper and electronic component, while newly created cases had only an electronic component. All documents received in paper were retained; however, the Claims Examiners (CE) used only the electronic case file documents for case management activities.

Because the pilot was deemed to be successful, DCMWC decided to end the pilot project and move to an imaged environment Program-wide using OIS.

Purpose: To outline the policies pertaining to the processing of case documents within OIS and those received via the Central Mail Room (CMR). These instructions are in addition to those outlined in OWCP Bulletin No. 14-01, titled Converting Workers' Compensation Paper Documents Into Official Imaged Case Records and issued December 12, 2013.

Applicability: All DCMWC Contract and Federal Staff

Actions:

I. Stakeholder Actions: OWCP sent letters to claimants, responsible operators, insurance carriers, representatives and medical providers in November 2014 (or earlier in some instances) to notify them about the new case identification numbering system and conversion to electronic case files, and to ask them to submit all case specific documents to the Central Mail Room in London, Kentucky.

1. All case specific documents including correspondence should be sent to the Central Mail Room. Documents submitted to the CMR include, but are not limited to, the following:

- All OWCP/DCMWC forms
- All case specific correspondence
- Requests for case file copies/documents

- Medical reports
- Change of address notifications
- Representative payee documents
- Income verification
- File extension requests
- Withdrawal, modification and reconsideration requests
- Hearing requests
- Interrogatories
- Affidavits
- Overpayment documents
- Documents pertaining to responsible operator liability

Exception: Certified or notarized birth certificates, marriage certificates with a raised seal, checks, physical evidence, and any other document a Claims Examiner specifically requests be submitted directly to the District Office should be sent (via mail, commercial delivery service, or hand delivery) to the District Office administering the claim rather than the CMR.

2. Inquiries or documents pertaining to coal mine operators, insurance coverage, self-insurance and the like that do not pertain to a specific case should be sent to the DCMWC Chief -Branch of Standards, Regulations and Procedures, Washington, DC.

3. Other general non case-specific inquiries (e.g. jurisdictional inquiries, requests to visit to an office, etc.) should be sent to the individual District Offices to the attention of the District Director.

II. Central Mail Room Site Actions:

1. Document Receipt. Any document received in CMR is prepared for scanning. The date the document is first received by OWCP, either at the CMR site or at a District Office, is preserved. If there are documents that are not scanned on the date they are received, they are bundled in a place designated for that day's mail. Separating mail by Received Date avoids the mixing of mail received on different dates and ensures the integrity of all dates entered into OIS.

2. Envelopes. Upon opening mail, all envelopes will be prepped and sorted along with the contents of the envelope as noted in Items 1 and 3 in this section. If documents pertaining to more than one case are submitted in one envelope, the envelope must be scanned for each case along with the relevant case documents. When mail is returned by the U.S. Postal Service, the envelope must also be retained and scanned into the file as the first page along with the returned mail.

3. Document Preparation. Preparing a document for scanning includes removing staples, removing paper clips, etc. Documents and forms are then sorted into batches based on Received Date and type of document, e.g., new claim forms for a Case Create queue, mail with case numbers identified for the Standard queue and mail without a case number in the Unnumbered

queue. Slip sheets, called Batch Header Sheets, will be inserted between documents in each batch.

Items received that cannot be accurately scanned into OIS, such as videos, photographs, x-rays, and DVDs, will be tagged as “physical evidence” and handled as specified below in Item 5.

4. Redacting Documents. If a document contains information for multiple claimants, CMR staff will:

- a. make one copy of the document for each relevant case (i.e., each case identified in the document);
- b. for each case, prepare one copy of the document by redacting all Personally Identifiable Information (PII) not related to the relevant case; and
- c. scan each redacted document for the relevant case file.

5. Physical Evidence. If physical evidence is received (photos, CDs, etc.), CMR staff will place a standard memo into the electronic case file indicating that the physical evidence has been received for the individual case. The memo must include a brief description of the piece of evidence and the received date. CMR staff will then ship the actual physical evidence by overnight priority mail or commercial delivery service (e.g., Federal Express, UPS) to the District Office that is administering the claim.

6. All checks and money orders received by the CMR determined to be original should be sent through next-day shipping to the responsible District Office. The District Office will then process the checks and money orders in accordance with the instructions which follow at III.4.

7. Certified or notarized birth certificates or marriage certificates with a raised seal received by the CMR should be bronzed into OIS, then sent to the appropriate District Office for processing in accordance with the instructions which follow at III.2.a.1.i.

8. Scanning. CMR staff scans batches of documents and then reviews the quality of the image in comparison to the paper document.

- a. CMR staff will compare each scanned image to the paper original and confirm that the image is a clear, legible, and accurate reproduction of the original paper document. In each case where the original document has been annotated with a date stamp in accordance with Section III.2 below, the date stamp must be clearly viewable. Any images that do not satisfy these criteria will be re-scanned.
- b. If the image quality is still poor after re-scanning, but the image is an accurate reproduction of the original document, e.g., because the original document is itself unclear or illegible, a “description” is attached to the document within CMR’s system (and will also display in OIS) indicating that the scan “accurately depicts original” and is the “best scan possible”. The original document is retained and stored as specified below in Item 9.

- c. If the image quality is still poor after re-scanning, and the scan is not an accurate reproduction of the original document, a “description” is attached to the document within CMR’s system (and will also display in OIS) indicating that the scan “does not accurately depict original” and that the “original document has been retained as Physical Evidence.” The CMR will then ship the actual document by overnight priority mail to the District Office that is administering the claim as noted in item 5 in this section.
- d. After scanning and quality review, the documents are queued for indexing and verification.

7. Indexing. Indexing a document includes assignment of unique document identifiers for each imaged document. These elements include:

- a. Document Id: A unique number that is assigned to each batch of documents in OIS.
- b. Case Number: A unique number that is assigned to each claim in ASP.
- c. Claimant Name: The claimant’s name from ASP based on the case number that is entered.
- d. Category: A broad classification of the document, such as Employment History.
- e. Received Date: The date that the document was received by the CMR. If the document was initially received in the district office then forwarded to the CMR for imaging, then the “Received Date” will be the date the district office received and date stamped the document.
- f. Page Count: The number of pages indexed for that Document Id.
- g. Submission Date: The date that the document was submitted to OIS.

8. Verification and Release. CMR staff verifies that the document belongs to the case/claimant by utilizing case identifier validation criteria such as: SSN, case identification number, name, address, etc. If a match is found, the document is indexed and released to the associated case in OIS. If the document does not match an existing case, it is still prepared as outlined above, indexed and released into OIS. OIS automatically routes the document into one of the three queues (Case Create, Standard, or Unnumbered) where the document will be placed for review, validation and indexing by a CE.

9. Storage. Original paper documents that have been scanned are stored by date for a period of 60 days and then disposed of as directed by the DCMWC. Records and transcripts of formal hearings received from the Office of Administrative Law Judges will be retained by the District Office having jurisdiction over the case under current record retention policies.

10. Accuracy and Review. The CMR routinely reviews image quality and indexing accuracy to maintain an acceptable level of quality. The CMR then compiles a monthly report, due by the fifth business day of every month, and submits it to the Federal Contracting Officer Representative.

III. DCMWC District Office Actions: OWCP Bulletin 14-01, Section C, provides specific indexing and quality-assurance instructions for claims staff. DCMWC staff must follow those instructions. Additional guidance on other topics is provided below.

1. Documents Created by DCMWC Staff. None of the documents created by DCMWC District Office staff should be sent to the CMR for scanning. They will all be handled in the District Office as outlined below. DCMWC District Office staff will ensure that a copy of all outgoing documents is retained in OIS and that the retained copy is a clear and accurate representation of the final issued document that is transmitted to the parties or other interested persons.

a. Documents issued by a Claims Examiner or other staff member – For all documents created in the District Office that are to be associated with a case file, claims staff will create an electronic document, upload or “bronzed” the electronic document into OIS, and index it. In addition to outgoing correspondence, all CE notes and documentation of telephone calls will be bronzed and indexed in the OIS file.

For documents that call for a Claims Examiner’s signature, CE’s may use one of the following options:

- (1) print and sign documents by hand, or
- (2) electronically sign by inserting an image of the CE’s handwritten signature on the document’s signature line.

Examples of forms and documents that may call for a CE’s signature include, but are not limited to, the following:

- Development letters
- Decisions (PDO, SSA, NOC)
- Hearing referrals
- Workers’ compensation forms
- CM1104 – vent PFT validation request
- Status request letters

Documents that are printed and signed by hand (option 1 above) must be scanned post-signature and bronzed into OIS before they are transmitted to the parties or other interested persons. Documents that are electronically signed (option 2 above) may be bronzed directly into OIS. If a CE chooses to maintain an image of his or her signature, the image file must be stored on a network drive that is only accessible by the CE after providing proper log-in credentials. The CE who signs a document – by hand or electronically – is responsible for bronzing that document into the case file in OIS.

b. Documents issued by the District Director (DD) - Any outgoing document that requires the District Director’s signature must be uploaded into OIS once signed. The DD may either:

- (1) sign documents by hand, or
- (2) electronically sign documents by inserting an image of the District

Director's handwritten signature on the document's signature line.

Examples of forms and documents that may call for a DD's signature include, but are not limited to, the following:

- Waivers of overpayment
- Document for benefit payments and accounting
- Debt credits memo
- Recommendations on the payment of benefits
- Congressional inquiry responses
- Decisions
- CM-1261 benefits payment forms
- CM-1260 accounts receivable transaction

Documents that are printed and signed by hand (option 1 above) must be scanned post-signature and bronzed into OIS by the designated staff before they are transmitted to the parties or other interested persons. Documents that are electronically signed (option 2 above) should be bronzed directly into OIS either by the DD or his/her designee. The digital file containing an image of the DD's signature must be stored on a network drive that is only accessible by the DD or his/her designee after providing proper log-in credentials.

2. Receipt of Paper Documents and Physical Evidence in the District Offices. As outlined above in the Stakeholder Actions section of this bulletin, we have asked the public to send most documents to the DCMWC CMR. However, we have instructed stakeholders to submit certain items to the District Offices directly and there are times where the CE will request that an additional document be sent directly to his/her attention. In that situation, the CE should advise the individual to send the document directly to the street address for the District Office. In the event that a document is mailed to a District Office, directions for processing such documents are described below:

a. Routine Mail and Other Forms Received Directly in the District Office – These documents must be date stamped by the District Office on the day received. The documents can then be imaged by the District Office directly into OIS or mailed to CMR for imaging. The District Office may take one of two actions depending on the type of submission and the District Office's imaging/scanning capabilities.

1) The District Office may image/bronze documents directly into the case file. If the District Office chooses this option, the date of receipt must be preserved and the District Office must also employ all quality control methods including having designated staff compare each scanned image to the paper original to confirm that the image is a clear, legible, and accurate reproduction of the original paper document and that all pages have been imaged. The original paper document must be retained/stored for a period of 60 days prior to disposal just as if the document had been received by the CMR.

i) **However**, if a certified or notarized birth certificate/marriage certificate with a raised seal or photograph is received, the original document should be bronzed to OIS. Original pictures should be maintained with the District Office until final adjudication on the claim has occurred, as a photocopy may not be clear. Pictures should be forwarded to the OALJ if the claim is sent to that Agency. A memo to file is to be completed acknowledging that original pictures accompany the claim. For items other than pictures, the original documents should then be returned to the sender and not retained. A brief letter acknowledging the filing of the documents should accompany the original documents being returned. The acknowledgment letter should also be bronzed to OIS for record purposes.

2) If the District Office does not have the ability to scan/bronze the document in compliance with these requirements, or the document is voluminous, the District Office must mail the original date-stamped document, with all accompanying documents, to the CMR with a cover sheet indicating that the document has not been imaged. The CMR will then image the document according to the previously outlined protocols. The Received Date will be the date stamped on the document by the District Office.

b. Office of Administrative Judge (OALJ) Actions - The OALJ will continue to send decisions, along with transcripts and other documents, to the District Office responsible for administering the case. The District Office will scan/image the decision into the file preserving the received date. The transcript of the hearing and other documents or pleadings filed with the OALJ with respect to the claim will be retained by the District Office under current record retention policies.

c. Physical Evidence - Upon receipt of physical evidence, the CE should review it and add a memo to the file describing the evidence. The memo should then be bronzed into OIS as Other/Physical Evidence. If a paper component exists for the file, the physical evidence should be stored with the paper portion of the case file if possible. If the case is fully imaged, the physical evidence should be stored in another designated area by case number. The administering District Office will then store the physical evidence in a file folder in a specified area of the office and index the original memo as Review Complete.

X-ray evidence received on CD should be maintained and stored in accordance with Bulletin 14-08 (June 2014).

3. Receipt of Electronic Documents in the District Offices. As noted throughout this bulletin, parties should be advised to send case-specific documents to the CMR; however, there may be instances when a CE requests submission of a document via fax or other reliable electronic method. When the document is received electronically, the CE may bronze the document directly into the OIS case without any further action. If the document is received in paper form, the steps outlined above in section III.2. above should be followed.

4. Receipt of Checks in the District Office. Protocol still requires that a log of checks be maintained. Do not staple, tape, or glue checks. Do not obliterate the bank information at the bottom portion of the check, which will interfere with electronic processing. Checks received in District Offices which clearly are not intended for DCMWC should be returned to the maker or forwarded to the proper address if that can be determined. The proper disposition of checks depends on what kind of check it is and the purpose of the check. Checks pertaining to a specific case should be copied, scanned, and imaged to the appropriate OIS case file with category/subject pair (Fiscal/Other) and review status (Unreviewed). Do not forward checks to the CMR.

a. **Personal Checks, Money Orders, Bank Checks, Treasury Checks.** DCMWC staff should ensure that all letters and communication to beneficiaries, representative payees, financial institutions, insurance companies, etc., clearly indicate the correct address as to where payments are to be sent. Generally, payments should be sent to the District Office to assure identification. Checks received by District Offices which are intended to repay the Trust Fund should be researched by the receiving District Office staff employee and proper identifying information should be annotated on the check itself. Identifying information includes the Black Lung Accounting System (BLAS) account receivable account number, qualifier, debt number, office I.D., and part type. For example, "RMO#1234567 Acct. #123-45-6789 Debt #2 JO Part C." If the payee name is incorrect or if the check is not signed, it should be returned to the maker with an explanation and request for a corrected check. Forward Part B checks to the National Office, Accounting Section, for processing. Forward Part C checks to the lockbox for processing. If it can be reasonably expected that the maker of the check will correctly annotate identifying information on the check, they can be instructed to forward payments directly to the lockbox or to the National Office as appropriate.

b. **Restitution Checks.** Restitution checks issued by the Federal Government/U.S. Courts must not be confused with returned Treasury checks issued by our Program. Determine whether such checks are for Part B restitution or Part C restitution, and follow the same instructions as for personal checks and money orders. Do not return restitution checks to the Treasury.

c. **Returned Treasury Checks.** Checks issued by the Department of the Treasury which are returned due to incorrect payee, death of the payee, or bad address should be marked "non-negotiable" or "void" and returned to the Department of the Treasury for cancellation credit. If DCMWC issued the check to a beneficiary for payment of medical expenses (such as travel) and the payee mistakenly returned it because they misread the remittance advice to mean that they were overpaid and the check has to be returned, the District Office should contact the payee and explain the purpose of the check, and if the payment was due, return it to the payee. If another agency issued a Treasury check and it was returned to DCMWC in error, mark the check "non-negotiable" or "void" and return the check to the Department of Treasury.

d. **Freedom of Information Act (FOIA) Checks.** Forward FOIA checks to the

5. Interaction between OIS and ASP

a. **Case Type.** An automatic non-editable designation is displayed in the ASP case screen top window which identifies the case type as being Imaged, Hybrid, or Paper. If a new case is created in the imaged environment and has no paper component, only an electronic component, it will be designated in ASP as "Imaged." If the case has a paper and an imaged component, e.g. a piece of mail was received and imaged for a case that previously existed only in paper, the case will have a designation of "Hybrid" in ASP. If a case only exists in paper, with no imaged component, it is designated as a "Paper" in ASP.

b. **Diary Actions in ASP.** While OIS and ASP interact to a degree, they are separate systems; therefore, receipt of a document in OIS does not automatically update diary actions in ASP. As a result, the CEs must continue to enter diary codes in ASP in the same manner as before.

6. **Forms Submitted for Create Cases.** The OIS will automatically place any package that includes form CM-911 or CM-912 in the Case Create queue. When such a form is received, the CMR will scan it, along with all attachments, and release the documents into OIS. The OIS will then place the documents into the Case Create queue. The CE in the District Office having jurisdiction over the case must review the documents and create a case in the ASP. The ASP will immediately generate a case identification number and that number will be simultaneously available in OIS. The CE must then access OIS, select the applicable case identification number, and review and index all the documents into the newly created case.

7. **Mail With Case Identifying Information.** If received mail has correct case identifier information (such as the case identification number, first and last name, address or SSN) and does not include form CM-911 or CM-912, the document will be imaged and released by the CMR into OIS. OIS will place the document into the Standard queue for processing by the CE.

8. **Unnumbered Mail.** District Office staff will review the mail in the temporary Unnumbered mail queue on a daily basis to determine if a matching case number can be found. If a matching case number is found, then the document must be indexed to the correct case number. If a matching case number cannot be found, the following actions will be taken:

a. If the entity that submitted the document can be identified (i.e., return address), the document will be printed and returned to sender with instructions to resubmit it with the DCMWC case number or other identifying information sufficient to allow the document's association with the correct case. The document should then be deleted from OIS.

b. If identified as not intended for DCMWC, the District Office should consider sending the document(s) to the appropriate agency if located within the OWCP. For documents intended for recipients outside of the OWCP, the District Office should return such correspondence back to the original sender (if sender and location is known).

9. Indexing. Indexing a document includes assignment of unique document identifiers for each imaged document. As mentioned before, several of the fields will be auto-populated with data from OIS. The CE indexes a document by selecting the following data elements for each document:

- a. Subject: a more definitive description of document. The available selections are based on the Category.
 - b. Review Status: documents defaults to “Unreviewed.” After the document has been validated the status should be changed to “Review Complete”.
 - c. Description: allows users to enter a note. This field is optional.
 - d. ALJ Doc Class: allows users to flag the document for ALJ exhibits or other use.
 - e. Notify: allows users to exchange emails with one another about a specific document.
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10. Verification. The CE selects the case in OIS, reviews the document, verifies that the document is readable, and confirms that the document belongs to the case by checking the case identifier information. If the document is assigned to the selected case, the CE indexes the document and submits it to the case file in OIS. If the document does not match the selected case, the CE searches the ASP system to locate the correct case and indexes the document to the correct case number.

11. Release. After a document has been indexed, it is released into that case file in OIS for processing and maintenance.

12. Printing Documents. When documents are printed from the OIS file, there are several options. The document can be printed with the metadata, i.e., a footer that contains the case number, received date and page numbers, or any combination of these items. The document can also be printed without the metadata.

- a. Documents being forwarded for inclusion in the OALJ case record should always be printed with the metadata.
- b. Other Documents. Other documents should routinely be printed with a footer that contains the Case ID and the Received Date. The page number is optional.

Disposition: This bulletin is to be retained until the Coal Mine (BLBA) Procedure Manual has been updated.



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Distribution: All DCMWC Staff