



BLBA BULLETIN NO.14-01

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Subject: OWCP Imaging System

Background: In December 2013, the Division of Coal Mine Workers' Compensation (DCMWC) will begin piloting a new imaging system, the OWCP Imaging System (OIS), with the pilot starting in the Charleston district office. OIS is a software program which enables DCMWC staff to view electronic images of paper case file materials. The Charleston district office will pilot OIS starting December 9, 2013 through March 31, 2014 to evaluate the technical capacity and process needs for imaging DCMWC records.

OIS is a distinct "stand-alone" program, and DCMWC will not be integrating it with the Automated Support Package (ASP) for the pilot. ASP is the primary case management system for all work products and point of entry for all new claims processed under the Black Lung Benefits Act (BLBA). MIS reports the due dates and actions for the cases. DCMWC will modify ASP to allow for the identification of case files that are paper or imaged (either fully imaged or a hybrid of both paper and imaged documents) and display the OIS Case ID for reference in the OIS.

For the period of the pilot, district office personnel will be receiving incoming mail, preparing the mail for scanning, scanning the documents, providing quality control and doing the initial indexing prior to the documents being submitted and captured in OIS. The pilot will not involve imaging existing paper case files. During the pilot, all new claims for the Charleston district office will be processed as a fully imaged record. Cases either fully imaged or partially imaged during the pilot will not be transferred to a DCMWC jurisdiction outside of the Charleston district. After the pilot ends the incoming mail will be processed by a contract vendor, Central Mail Room (CMR).

While the information provided in this Bulletin provides guidance on the implementation of a pilot process for capturing and storing electronic images of paper documents, it does not alter the manner in which the claims examiner (CE) adjudicates claims based on the legal or regulatory requirements of the BLBA Procedure Manual. DCMWC expects the responsible CE to conduct a thorough examination of the case evidence, including any imaged record, to reach a sufficient, accurate and justifiable claim outcome. Moreover, as this is a pilot of an imaging system, the DCMWC will be conducting routine audits to ascertain confidence in the imaging system's functionality and accuracy. Federal personnel designated by the Charleston District Director are responsible for conducting these audits.

DCMWC's ultimate goal is to implement a program-wide imaging program to facilitate administrative efficiencies and lessen administrative costs. This pilot is the first step in achieving that goal. Once the pilot is complete, DCMWC will proceed with an expansion of imaging nationwide. DCMWC considers the implementation of OIS as having several distinct advantages:

- Allows for employee remote access to electronic case records
- Enhances customer service support
- Reduces the need to physically handle paper case files
- Facilitates better organization and access of claim records
- Reduces Personally Identifiable Information (PII) violations due to lost or damaged packaging
- Reduces the logistical costs of storage and maintenance of paper files
- Decreases costs associated with shipping case file
- Facilitates continuity of operations during emergencies or other disruptive events
- Assists in making CE positions telework eligible
- Allows expansion of the use of DCMWC imaged documents by external customers as well.

References: OWCP Imaging System (OIS) Functional Requirements version 1.19, OIS Document Capture Process and OWCP Bulletin No. 01-01.

Purpose: To provide guidance on the handling of imaged documents during a pilot in the Charleston district office.

Applicability: All DCMWC's staff and contractor staff

Actions:

1. Upon receipt of new mail in the Charleston district office, the mail will be taken to the appropriate scanning area where designated staff will prepare the mail for scanning and scan the document. The word staff refers to both federal and contract (in-house staff). If documents are not scanned on the date they are received, they are bundled in a place designated for that day's mail. This avoids the mixing of mail received on different dates and preserves the integrity of all dates entered in OIS.
2. The staff is responsible for imaging all incoming mail and envelopes for the Charleston district office. Imaged paper will be held for 60 days.
3. Prepare the document for scanning by removing staples, paper clips, taping down small slips or paper and envelopes, etc. Documents and forms are then sorted in batches based on received date and type of document and the type of document, e.g. new claims forms for a "Case Create Queue", mail with case numbers identified for the "Standard Queue" and documents without case numbers or the case number is not readily identified.
4. The staff scans/images batches of documents and then reviews the quality of the image in comparison to the paper document.
5. Once the document is imaged, the staff will verify the quality of the electronic image by checking it against the original document, confirming that the image is clear, legible, and accurate reproduction of the original paper document. After scanning and quality review, the documents are queued for initial indexing.

6. The staff then completes the initial indexing prior to the documents being submitted and captured in OIS. The staff will conduct the Category indexing based on a Category and Subject index list created by DCMWC.
7. Indexing a document includes assignment of unique document identifiers for each imaged document. Staff keys in the following data elements for each of the document:
 - a. Number – Number of alphanumeric sequence representing a unique case
 - b. Document Category – A broad classification of the document, such as the Employment, Medical, Benefit Maintenance.
 - c. Document Subject – A more refined classification of the document, such as CM-911a: Employment History, CM-988: History & Exam for CM Pneumoconiosis, CM-908: Benefits Payment Change Form
 - d. Author Date – The date on the document if provided
 - e. Received Date – The date the document was received
 - f. The system will automatically capture the following document information, Program Name, Document ID, Capture Source, Capture Date, Release/Submission Date, Batch Name/ID, and Review Status (usually set to Unreviewed).
8. When entering the indexing date for the document, the staff verifies that the document belongs to the case/claimant.
9. When a case number is not available at the “initial index” step, the document will be placed in one of two queues for review prior to indexing:
 - Case Create Queue – the document is a new CM-911 or CM-912 form and needs to go through the case create process.
 - Unnumbered Mail Queue – the document is not a CM-911 or CM-912 form and the case number cannot be readily identified.
10. After the document has been indexed and verified that it belongs to the case to which it has been associated, it is released into OIS.
11. For new cases, once the documents are imaged and in OIS, as per current case create guidance, the staff will create the case in ASP. The staff will then identify the case number in ASP and update it in OIS.
12. Newly scanned documents requiring review will be placed in the CE’s Unreviewed Documents list for review.
13. For imaged documents in the Unnumbered mail queue, designated staff at the Charleston district office will use ASP to locate and identify the case number ID. Once the case ID is located, if Charleston is the correct jurisdiction for the claim, the imaged document is to be associated in OIS with the existing case file. When the designated staff indexes the document, he or she selects the appropriate Category using the drop down menu.
14. For unreviewed mail associated with a Charleston case, the claims examiner selects a case from the unreviewed documents list and performs the following:

- a. Verifies document legibility and page sequence
 - b. Reviews the document and its document list information
 - c. Reviews the category index and adds the subject index —verifies and updates the attributes
 - d. Saves the index with a Review Status of “Review Complete”
 - e. Sends a “Notification” alert to the staff that is responsible for taking action on the document.
15. For documents other than incoming mail that are created in the Charleston district office that are to be associated with a case file, appropriate staff are to create an image of the final document and upload or “bronze” the electronic document into OIS. For any outgoing document that requires a signature, once the document has been printed and signed, designated staff scans and uploads the signed documents into OIS. This guidance only applies to final documents, not drafts.
16. ASP will have a “flag” to identify records relating to the case documents in “imaged” format. The ASP flag will identify whether the case is paper only or imaged (either fully imaged or a hybrid of both paper and imaged documents). Regardless of the ASP flag, the CE must review all documents, paper or imaged, prior to claim adjudication actions. The CE should not print out the imaged record for insertion into an existing paper case file.
17. Mail should only be imaged for the Charleston district office. If a claim form or other mail which belongs to another district office is imaged by mistake, the claims examiner will mark the document for deletion, and obtain approval of district office management. Staff will then locate the original document and mail it to the appropriate office.
18. For the duration of the imaging pilot, all paper documents that undergo imaging are to be retained for quality control evaluation, and auditing purposes for 60 days. The staffs imaging the documents are responsible for maintaining the documents by date received to allow for access by appropriate federal staff.
19. Designated federal staff is to perform a daily audit of the imaging system to ensure that incoming documents are properly imaged, indexed to program guidelines, assigned properly to the associated case file, and imaged documents are of readable quality.
- a. During the pilot, each day the designated auditor staff is to identify the total number of distinct incoming documents received in the Charleston office. The auditor is to identify random documents from incoming mail (to include facsimiles, multiple page documents) which are unprocessed by the designated staff.
 - b. Once the auditor has randomly selected a document, he or she is to annotate the OIS Document Audit Worksheet. (See Exhibit 1). The auditor enters the date of document receipt, the case ID, and a brief description of the document. The auditor is to return the mail to the incoming mail queue for OIS processing.
 - c. The auditor will then attempt to locate the sampled document once the staff has completed the electronic capture, and uploaded the document image into OIS. Using the OIS Document Audit Worksheet, the auditor will note whether the electronic version of the sampled document is found in OIS, whether the imaged document is readable, and whether the document is correctly associated with the proper case file. The auditor will then initial and date the entry.

- d. If the sampling reveals problems with document control or image quality, the staff is to notify the District Director explain the corrective action that will be taken by the district office.

Distribution: Supervisors, Claims Examiners, Workers' Compensation Specialists, Workers' Compensation Assistants, Information Systems Training Support, District Office Mail & File Sections.



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Attachment 1

