



Date: May 1, 2020

MEMORANDUM FOR: RACHEL D. POND  
Director  
Division of Energy Employees Occupational Illness Compensation  
Office of Workers' Compensation Programs

THROUGH: JOHN VANCE  
Chief, Branch of Policy, Regulations & Procedures  
Division of Energy Employees Occupational Illness Compensation  
Office of Workers' Compensation Programs

FROM: CHRISTOPHER R. ARMSTRONG, MD, MPH, FACPM, FAsMA  
Medical Director  
Division of Energy Employees Occupational Illness Compensation  
Office of Workers' Compensation Programs

A handwritten signature in blue ink, appearing to be "C.R.A.", written over a circular stamp or mark.

SUBJECT: Audit of Third Quarter (CY 2019) Contract Medical Consultant  
(CMC) Reports

I conducted an audit of contract medical consultant (CMC) reports billed during the third quarter of Calendar Year 2019 to ensure that appropriate medical specialists are being assigned to advise the Government, and that the reports we receive are well-reasoned, complete, and responsive to the needs of our claims examiners. My audit included a review of 49 randomly selected CMC reports for four distinct services: causation analyses, impairment ratings, second opinions, and supplemental file reviews. I used a checklist to assess the reports for adherence to contract requirements and program policies promulgated in the *Procedure Manual* and the *Physician's Reference Manual*. The audit included 18 causation analyses, 20 impairment ratings, 3 second opinions, and 8 supplemental file reviews.

Seven of the 49 reports clearly exceeded expectations, 34 met requirements, and eight did not meet requirements. The reports by [REDACTED] and [REDACTED] were thorough, well-reasoned, informative, and helpful. [REDACTED] and [REDACTED] each prepared two of the eight reports that did not meet requirements.

Three of the reports were not consistent with the evidence in the file. Three of the reports demonstrated inaccurate application of tables in *AMA Guides™ to the Evaluation of Permanent*

*Impairment, Fifth Edition* and two demonstrated use of inappropriate tables in *AMA Guides*<sup>TM</sup>. Two reports included ratings for conditions that have not been accepted by the Office of Workers' Compensation Programs and one demonstrated a complete disregard for the *AMA Guides*<sup>TM</sup> methodology. Several of the reports demonstrated more than one deficiency. All eight of the reports not meeting requirements may have resulted in an inappropriate disability determination.

#### Follow-Up Action Plan

Charles Bogino, the Contracting Officer's Technical Representative (COR), will notify QTC of the reports exceeding expectations and the deficiencies in the reports that did not meet requirements. QTC will be given the opportunity to respond, in writing, to each deficiency.