



Date: June 23, 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

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

I conducted an audit of contract medical consultant (CMC) reports completed during the fourth 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 48 randomly selected CMC reports for four distinct services: causation analyses, impairment ratings, second opinions, and 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 23 causation analyses, 17 impairment ratings, 5 second opinions, and 3 file reviews.

Six of the 48 reports clearly exceeded expectations, 39 met requirements, and three did not meet requirements. [REDACTED], and [REDACTED] were thorough, well-reasoned, informative, and helpful. [REDACTED] prepared two of the three reports that did not meet requirements.

Two reports demonstrated inappropriate use of a table or section in *AMA Guides™ to the Evaluation of Permanent Impairment, Fifth Edition*, and the CMC combined more than one WPI rating for the same organ system in two of the reports. One report was inconsistent with the

evidence in the file, and one demonstrated inaccurate application of the appropriate table in *AMA Guides*TM. Several of the reports demonstrated more than one deficiency. All three 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.