

Claims Management System Corrective Action Plan 2018 - 2019

An external audit of the workers compensation Claims Management System was conducted by BRM Risk Management from 15-17 January 2019. The following corrective action plan details actions to be undertaken in response to non-conformance and observations identified.

Non-Conformances

| Non-Conformance | Corrective Action | Action Officer | Date to be Completed | Status | Evidence |
|---|--|-----------------|----------------------|-------------|--|
| 2. Planning | | | | | |
| Criterion 2.2 The determining authority has documented procedures for paying compensation to injured employees, dependants of deceased employees, providers of medical treatment and other recipients. | | | | | |
| ANU do not have a documented procedure for paying compensation to injured employees. | Conduct workshop session with key stakeholders to review the end to end process of paying compensation to injured workers. Identify efficiencies and administrative improvements. | Lisa McLoughlin | 10-Mar-19 | Completed | A: Meeting invite of 20/02/2019 |
| | Document procedure for the payment of incapacity entitlements, including the interaction with HR remunerations in the ANU Claims Manual. | Lisa McLoughlin | 10-Mar-19 | Completed | B: Claims Manual section 8.18.10 |
| | Provide injury and claims management teams with an overview of the documented process and requirements from both teams. | Lisa McLoughlin | 31-Mar-19 | Completed | B: Claims Manual section 8.18.10 |
| | Review all current communication provided to injured employees in regards to the claims management process - workers compensation claim pack, interent site - to ensure information on the University's process to claim compensation is clear and accurate. | Lisa McLoughlin | 31-Mar-19 | Completed | C: Workers Compensation Claims Pack. Also see ANU website page - https://services.anu.edu.au/human-resources/health-safety/workers-compensation-at-anu/forms |
| 3. Implementation | | | | | |
| Criterion 3.3. The determining authority communicates relevant information regarding the claims management process | | | | | |
| ANU does not communicate the employees' rights and obligations effectively. | Review documents stored on intranet pages to ensure that correct versions and information is provided to ANU staff about their rights and obligations. | Lisa McLoughlin | 28-Feb-19 | Completed | D: Email to HR Systems 27/02/2019 |
| | Update the incapacity template letters to remove references to 'reconsidered decision'. | Lisa McLoughlin | 15-Feb-19 | Completed | E: Template Letters 26 - 29 |
| | Update the Notice of Rights to remove the requirement to use the reconsideration request form, and add information about the AAT process. | Lisa McLoughlin | 28-Feb-19 | Completed | F: Template Form 'Your rights regarding a determination' |
| Criterion 3.5 The determining authority complies with the provisions of the SRC Act when making decisions on claims, including: (i) determining claims accurately and quickly (ii)determining claims in writing with adequate terms and reasons (iii)ensuring there is equity of outcomes resulting from administrative practices used by Comcare. | | | | | |
| ANU does not comply with the provisions of the SRC Act when making decisions on claims. | Review and update s14 initial acceptance letter template to reference s16 and s19. | Lisa McLoughlin | 10-Mar-19 | Completed | G: Template Letter 10 |
| | Review and update s8 template letter to provide figures and explanations. | Lisa McLoughlin | 10-Mar-19 | Completed | H: Template Letters 8 and 9 |
| | Review and update s19 template letters to include all detail explaining how the incapacity entitlement was arrived at. | Lisa McLoughlin | 10-Mar-19 | Completed | E: Template Letters 26 - 29 |
| Criterion 3.8 The determining authority complies with the provisions of the SRC Act when determining liability for incapacity. | | | | | |
| ANU does not comply with the provisions of the SRC Act when determining liability for incapacity. | Update the Claims Manual to include guidance on s116 (accrual of leave). | Lisa McLoughlin | 10-Mar-19 | Completed | I: Section 8.18.4 of Claims Manual |
| | Review and update s8 template letter to include reasoning, figures and s9 explanation. | Lisa McLoughlin | 28-Feb-19 | Completed | H: Template Letters 8 and 9 |
| Criterion 3.9 The determining authority complies with the provisions of the SRC Act when determining liability for benefits, including medical expenses. | | | | | |
| ANU does not comply with the provisions of the SRC Act when determining liability for benefits, including medical and the like expenses. | Investigate options for automating a s16 determination for payments made to employees for medical treatment. | Lisa McLoughlin | 28-Feb-19 | Completed | J: Emails with Finance |
| | Implement the process for issuing s16 determinations for payments made to employees for medical treatment (this will be a manual process if an automated process is not feasible). | Lisa McLoughlin | 31-Mar-19 | In progress | K: |

| Observations | | | | | |
|--|---|-----------------|----------------------|-------------|---|
| Observation | Corrective Action | Action Officer | Date to be Completed | Status | Evidence |
| 2. Planning | | | | | |
| Criterion 2.3 The determining authority recognises legislative obligations and plans for legislative and regulatory compliance, having regard to any policy advice that Comcare or the Commission may issue. | | | | | |
| ANU should review the Claims Management Manual and remove references to activities by or for the employer as ANU is now the determining authority. | Review the Claims Manual to remove references to activities for the 'employer' now that ANU is the determining authority. | Lisa McLoughlin | 31-Mar-19 | In progress | Claims Manual |
| Criterion 2.5 The determining authority establishes plans to: (i) achieve its objectives and targets (ii) promote continuous improvement (iii) provide for effective claims management arrangements. | | | | | |
| The University is yet to formalise its Work Environment Group Business Plan to incorporate the plans necessary to achieve CMS targets and objectives, promote continuous improvement and provide for effective claims management arrangements. | Update the draft Work Environment Group Business Plan to ensure CMS targets and objectives are included. | Ingrid Krauss | 31-Mar-19 | In progress | L: |
| | Ensure that the business unit target and objectives are reflected in the performance development review objectives 2019 for staff with direct responsibilities of the CMS. | Ingrid Krauss | 31-Mar-19 | In progress | M: |
| | Ensure that Comcare as the third party claims provider, are provided with a copy of the CMS audit report, noting performance against the service level agreement standards specified, and the further development / continuous improvement process required for compliance standards to be met. | Lisa McLoughlin | 31-Mar-19 | Completed | N: Meeting invite of 21/02/2019 |
| 3. Implementation | | | | | |
| Criterion 3.12 The determining authority complies with the provisions of the SRC Act, and any specific licence conditions (if applicable), when managing reconsiderations. | | | | | |
| ANU should ensure that reconsideration of own motion is undertaken in accordance with the requirements specified in the Claims Management Manual. | Create a template letter to be used for reconsiderations of own motion. Review and update the reconsideration of own motion procedure in the Claims Manual. | Lisa McLoughlin | 10-Mar-19 | Completed | O: Template Letter 48. P: Section 11.4 of Claims Manual |
| Criterion 3.13 The determining authority provides employees with a reasonable opportunity to provide information or comment when claims for ongoing liability are being assessed or reviewed. | | | | | |
| ANU to review its procedure on determining no present liability and consider advising the employee in writing and providing copies of relevant medical information indicating no present liability prior to issuing a determination. | Review and update procedure in the Claims Manual in relation to giving notice of an intended decision of no present liability. | Lisa McLoughlin | 28-Feb-19 | Completed | Q: Section 8.14.19 of Claims Manual |