

Submission in Response to the Compliance and Performance Review of the Workers Compensation Nominal Insurer Scheme

Introduction

The Chinese Australian Services Society Limited, as a part of the group commonly known as “CASS” in the community, welcomes the opportunity to lodge a submission in response to the compliance and performance review of the Workers Compensation Nominal Insurer Scheme to the State Insurance Regulatory Authority (SIRA). As a longstanding community organisation, CASS is committed to provide a safe and healthy workplace for all employees and support the welfare of the employees and to manage workplace injuries. Our submission is a reflection of the observation and conclusions we made while receiving services from icare and Employers Mutual NSW (EML).

About Our CASS Group

The CASS Group provides a comprehensive range of social and welfare services. It is widely known and promoted in the community with our brand name "CASS". It consists of a group of organisations, all of which are charities registered as companies limited by guarantee, including principally its parent entity, the Chinese Australian Services Society Ltd (founded in 1981), and the subsidiary, CASS Care Ltd (established in 2002) which is also an endorsed public benevolent institution (PBI) by the Australian Taxation Office. At present, more than 2,800 families access CASS services and activities weekly.

Our Response to the Compliance and Performance Review of the Workers Compensation Nominal Insurer Scheme

We are glad that SIRA is seeking comments on issues which are considered relevant to the Review. The Compliance and Performance Review of the Workers Compensation Nominal Insurer Scheme Discussion Paper sought organization’s views and experiences and insights of the Nominal Insurer’s performance and its agents EML. In contributing to the Review, our comments on Workers Compensation Premiums and Workers Compensation Claims Managements are:

1. Workers Compensation Premiums

Giving the rating scale from 5 (excellent) to 1 (poor), the rate of our overall experience with workers compensation premiums issued by icare is 3.

The premium of CASS Care Limited [REDACTED] for this year, 31/12/2018 – 31/12/2019, has increased by 37% from the previous policy year, which may have breached the principles under SIRA’s *Market Practice and Premiums Guidelines (MPPGs)*. The information provided in the Premium Information Pack was found limited and confusing in terms of addressing the calculations of the premium, neither the telephone contact made to icare on early June 2019 could address our concerns appropriately.

In addition, we found the delay of receiving the tax invoice of the premium. For this policy year, the tax invoice was issued on 28 May 2019 while the tax invoice of the previous policy was issued on 14 December 2017, which has caused impact on the period reporting in our Finance Unit.

CASS believes that if icare could have a higher level of transparency, including showing detailed premium calculations and provide training or information sessions to the employers would help to address the concern. Regarding the comments made to the tax invoice issue date, CASS would suggest icare to have a more regular issue date on an annual basis so the employer can better project and manage the premium.

2. Workers Compensation Claims Managements

Giving the rating scale from 5 (excellent) to 1 (poor), the rate of our overall experience with the management of claims by EML is 2.

Having EML as the scheme agent for all new claims since 1 January 2018, CASS lodged [REDACTED] new claims. The issues CASS has experienced are:

- Misplaced emails

Example 1 (see Appendix A, B, C & D)

Claim No. [REDACTED]

According to EML's instruction, CASS sends out the inquiry email to its case manager, EML (mail@eml.com.au) and icare (piclaims@icare.nsw.gov.au) each time. For this claim, CASS was notified that EML did not receive the documents CASS sent to them on 20 May 2019. CASS then resent the email on 23 May 2019, and was told on 28 May 2019 that EML still did not receive the email. This issue was resolved later on by sending out the email the third time to the case manager's team leader of EML.

Example 2 (see Appendix E)

Claim No. [REDACTED]

As confirmed by EML on 20 April 2018, the support documents emailed to them on 26 March 2018 for the second time was misplaced in different document area, therefore, EML could not locate the documents.

- Incorrect weekly wage reimbursed

Example 1 (see Appendix F & G)

Claim No. [REDACTED]

CASS requested to claim \$ [REDACTED] for the period [REDACTED] by sending out the wage reimbursement claim form via email. However, EML overpaid \$167.50.

Example 2 (see Appendix H)

Claim No. [REDACTED]

This claim was lodged on [REDACTED] CASS made contact with EML enquiring about the discrepancies between the weekly wage reimbursement CASS claimed and EML actual

reimbursed on [REDACTED] And found out that the PIAWE amount shown on the provisional liability letter issued by EML was incorrect. The correct PIAWE amount should be \$ [REDACTED] rather than [REDACTED]

Example 3 (see Appendix I)

Claim No. [REDACTED]

As confirmed on [REDACTED] EML has mistakenly reimbursed total [REDACTED] 0 for the period [REDACTED] The overpayment has been transferred back to EML.

- Failing to respond to enquiries

Example 1 (see Appendix J, K & L)

Claim No. [REDACTED]

Enquiry email sent to EML (mail@eml.com.au), the case manager and icare (piclaims@icare.nsw.gov.au) on 12 April 2019, 17 May 2019 and 7 June 2019, no response received to address our concerns regarding the claim.

Example 2

Claim No. [REDACTED]

Out of the times CASS made contact to the assigned case manager, we rarely received return calls or email. Details of this issue re this claim:

This claim was lodged on [REDACTED] and the injured worker is fit for pre-injury duty from [REDACTED] CASS contacted EML to follow up the closure of the claim on [REDACTED] [REDACTED] the case manager failed to return the call for both occasions. For a different enquiry, CASS attempted to contact this case manager on [REDACTED], the case manager failed to return the call once again. On [REDACTED] CASS contacted the case manager to follow up the claim. Again, no return calls.

- Communication delay

Example 1

Claim No. [REDACTED]

The claim was lodged on [REDACTED] Until [REDACTED] no letter or any confirmation email has been received. CASS has only been verbally confirmed that EML has accepted the provisional liability on medical expenses and weekly payments and was told the PIAWE amount on the phone.

Example 2

Claim No. [REDACTED]

CASS tried to contact the case manager to discuss the claim and was told that a new case manager has been assigned to this claim about one week ago. CASS did not receive any notification prior to the phone call.

Example 3

Claim No. [REDACTED]

This claim was lodged on [REDACTED] CASS only found out the change of the case manager when made contact with EML on [REDACTED]

Example 4 (see Appendix M)

Claim No. [REDACTED]

The case manager emailed CASS on [REDACTED] advising that she will be reviewing for closure of this claim. CASS contacted EML on [REDACTED] to follow up the closure of the claim. As the case manager was not available, another consultant assisted on the call. The consultant confirmed that the system shown the claim has been closed on [REDACTED] and she could not figure out the mismatch information as provided by the case manager.

Example 5

Claim No. [REDACTED]

This claim was lodged on [REDACTED]. The acceptance of provisional liability letter was not received until [REDACTED].

Example 6

Claim No. [REDACTED]

The injured worker is fit for pre-injury duties from [REDACTED]. CASS was not informed the closure of the claim until the day we made contact with EML on [REDACTED] and was confirmed that the claim has been closed on [REDACTED].

Example 7 (see Appendix N)

Claim No. [REDACTED]

CASS called EML on [REDACTED] and was confirmed that the case has been closed on [REDACTED]. However, on [REDACTED] CASS just received an email from the claims advisor of EML with the claim closure letter attached.

With the view of the management of claims by EML, CASS would suggest EML to review their standard operating procedures aiming to provide a more efficient and quality services to the customer, while reducing miscalculation and miscommunication.

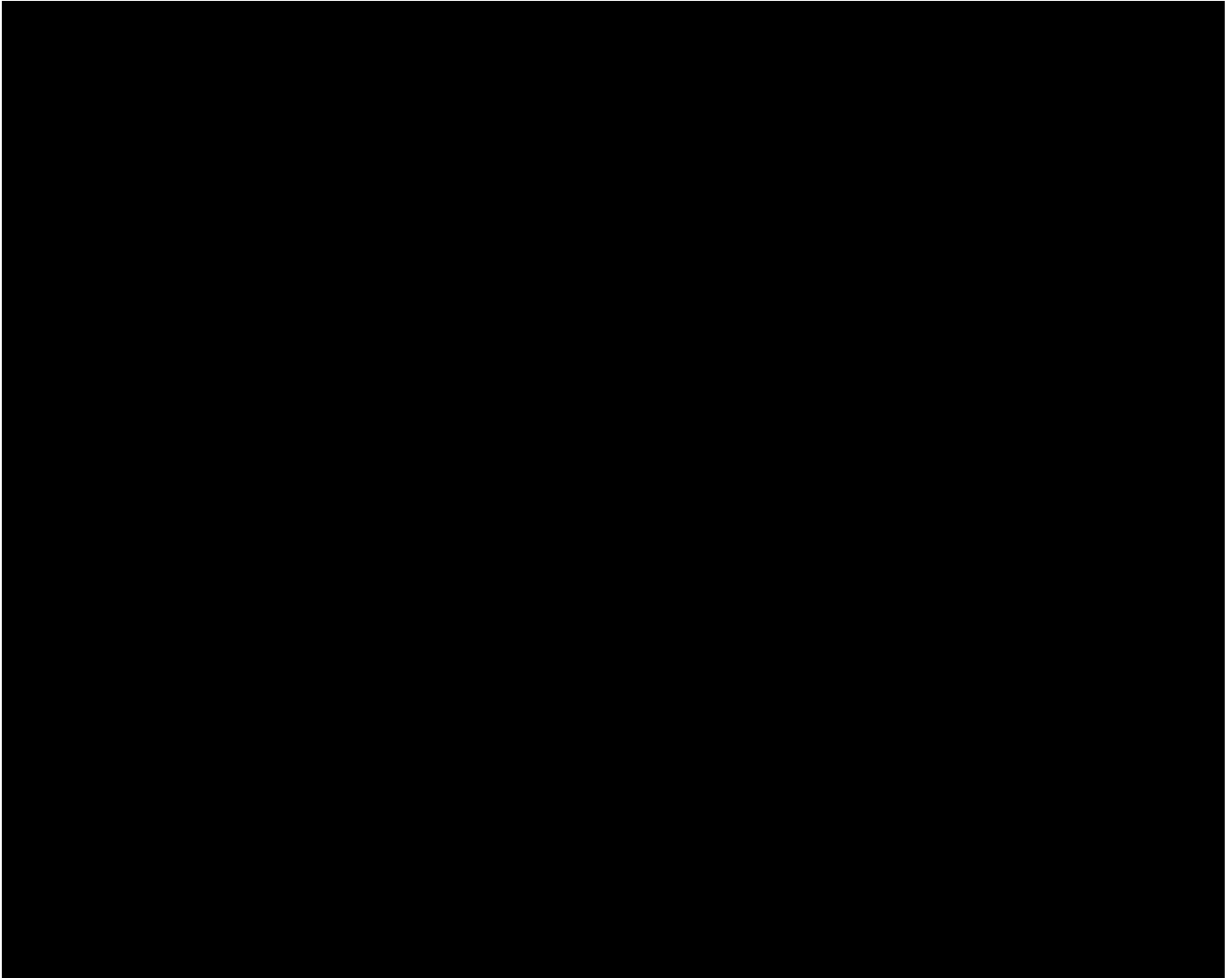
Conclusion

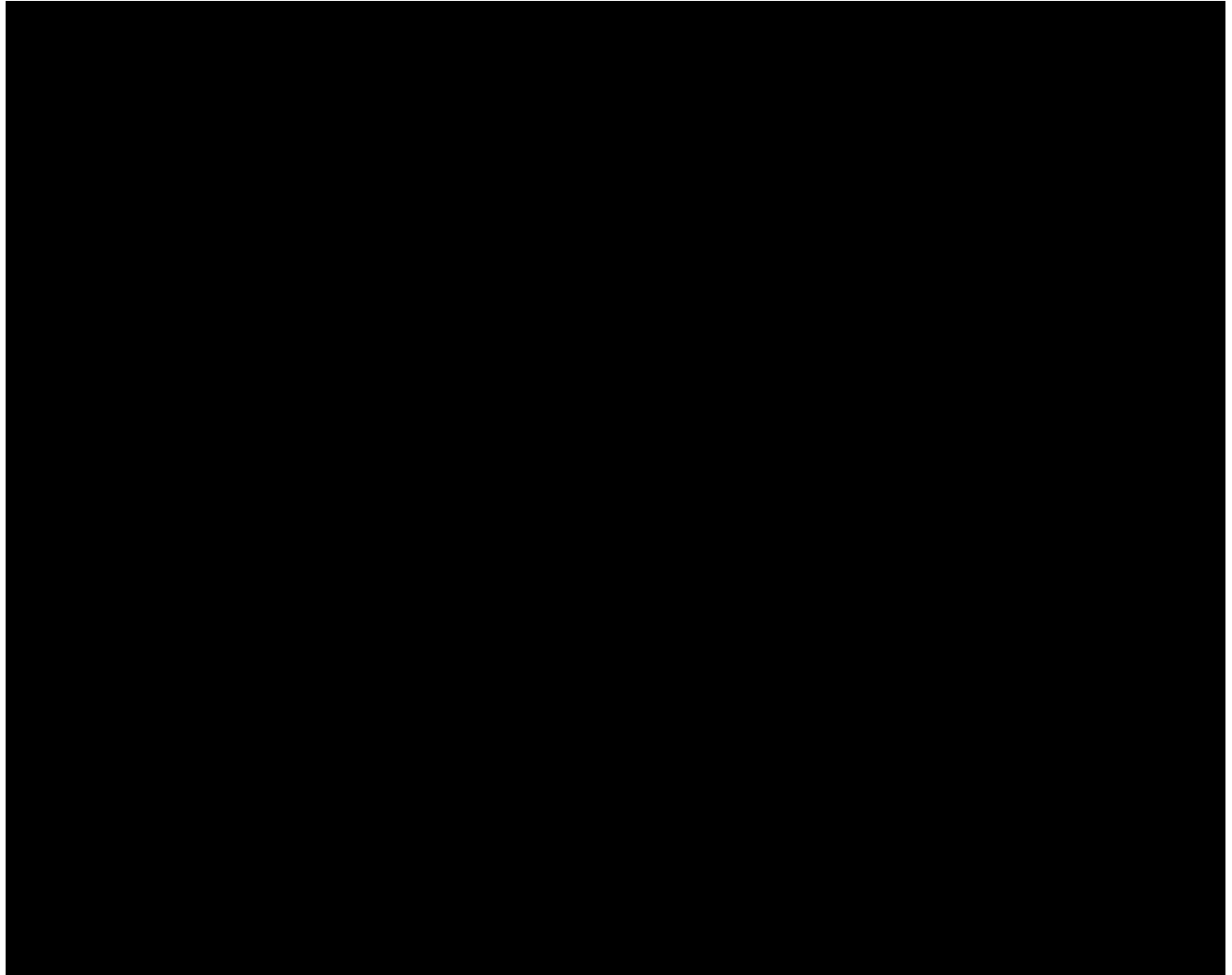
We welcome the opportunity to provide comments to the compliance and performance review of the Workers Compensation Nominal Insurer Scheme. We would appreciate if SIRA takes into account the viewpoints and concerns raised in this submission. We are happy to have a further discussion to elaborate these viewpoints and concerns.

We consent to our submission being made public.

[REDACTED]
Human Resources Management/Senior Executive Officer
CASS Group

June 2019





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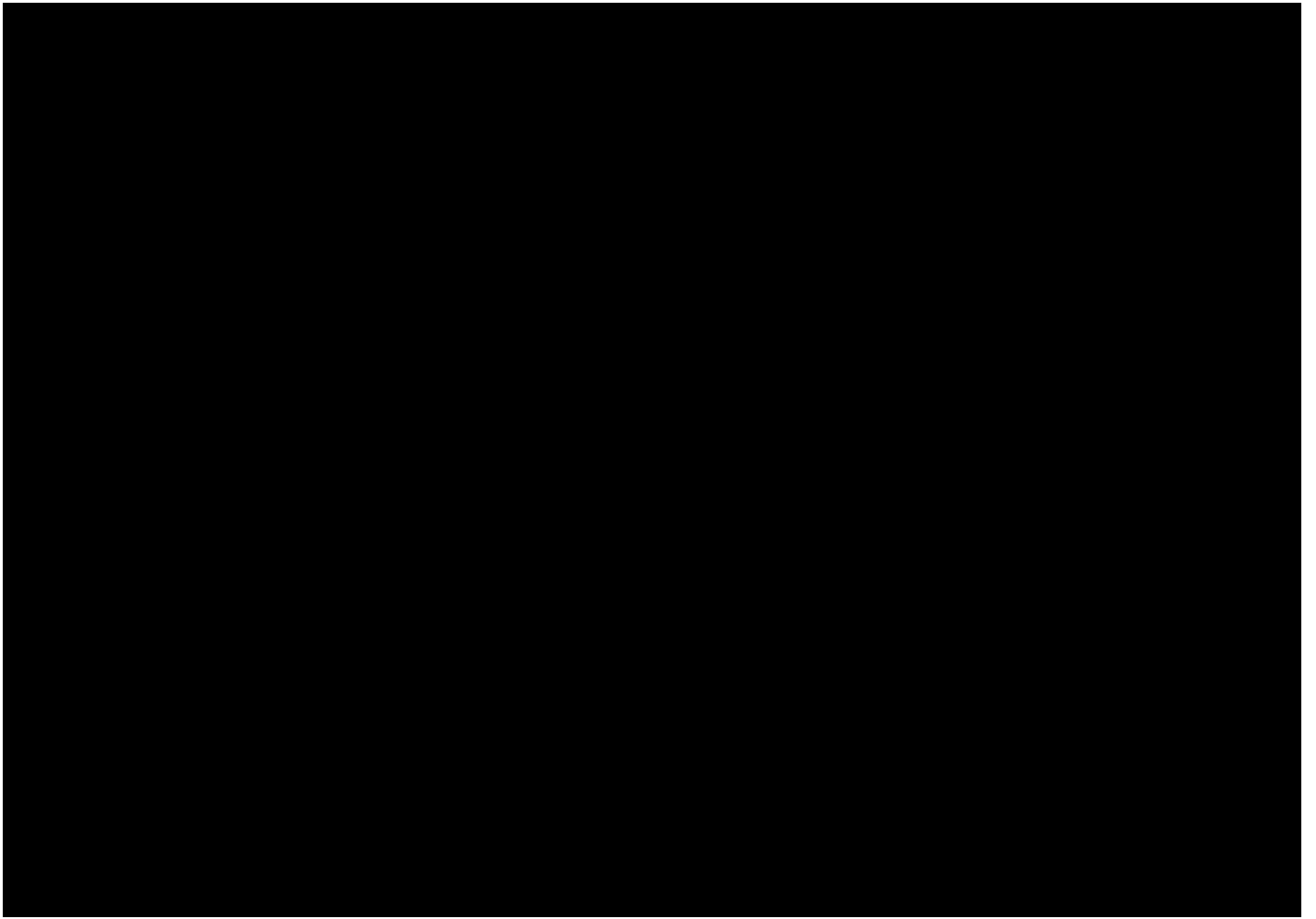
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