



N.S.W. Workers' Compensation  
Self Insurers Association Inc.

Employers Managing Their Own Risk

ABN 69 780 464 009



EMAIL:

13 June 2018

Team Policy & Design

WHBCR

State Insurance Regulatory Authority

Dear [REDACTED]

Thank you for your e-mail 27th April 2018 seeking further feedback post Claims Administration Manual Forum held 18<sup>th</sup> April 2018.

The Association maintains its original position as stated in the submission made to Dr Rhys Bollen dated 12th April 2018, specifically any claims administration manual, by operation of the legislation, can only apply to licensed insurers and not to self-insurers.

However, in the spirit of contributing to the discussion of this issue, the association has undertaken the following:

- At SIA Bimonthly meeting held on 31<sup>st</sup> May 2018, I as chairperson provided an overview of the CAM document released by SIRA; I as chairperson provided an overview of CAM workshop 18<sup>th</sup> April 2018 that I attended that was delivered by SIRA Policy department which included the goal of developing the manual, case for change, proposed draft chapters of manual, consultation process including SIRA's adopted sub - committee and proposed action timeframe between the period of March – July 2018.
- The 30 odd members in attendance were then broken into two groups with a lead facilitator assigned to each group to discuss / capture post their discussion around the proposed statement prepared by me the chairperson being... "Flesh out 1-3 questions / concerns / feedback so this can be documented and become the basis of SIA's formal response."

The following questions / comments were raised and have been categorised under the following headings:

#### **CAM Scope / Document Design:**

- If a CAM is to be established, it should only reflect the requirements of the legislation and regulations
- The CAM should be guidance material & not mandatory/auditable
- The content and changes must include the evidence of best practice and proven to improve outcomes for injured workers
- A guideline for finalisation and estimation must be included
- Is there a current piece of technology that SIRA are modelling the CAM on?
- How will SIRA consult upon any proposed changes to the CAM?

- How will the CAM align with targeted risk based regulator model?
- How much influence do iCare have over the CAM's content?
- Links to relevant reference sources must be included in the CAM.
- How enforceable will the CAM's content be?
- Where does the CAM fit into an S189 submission/business plan?
- Is there intent for the CAM to be part of the audit/licence/tiering requirements?

### **CAM Document Control:**

- Will the claims audit manual/tool change again?
- How will SIRA incorporate changes/updates and keep the CAM up to date?
- The timeframe for the CAM development/roll-out is too short for effective consultation?

### **CAM Communication:**

- There is concern that a CAM could not be a guide for all stakeholders in plain English.
- How will SIRA inform stakeholders when the CAM has been updated?
- Will the CAM be available to injured workers?
- What is the target audience?

### **CAM General Feedback:**

- The consultation period is too short – there is not enough time to understand/make changes/test changes
- Having a one stop guide will be a benefit?
- Who owns the CAM & signs off the content/decisions?
- The CAM should be delayed until the legislation regarding the changes to dispute resolution has been passed, otherwise the CAM will quickly become out of date



Upon receiving more information / consultation, the Association would be happy to provide further information and possible content inclusion for the CAM. We look forward to hearing from you and working in collaboration with SIRA.

Yours Sincerely

[Redacted Signature]  
 Alan Becken  
 Chairperson  
 NSW Self Insured Association