

# Submission on the implementation of WCIM 2023 consultation papers

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Please consider my comments below on the following consultation documents:

## 7. Implementation Consultation – Assessment of Permanent Impairment

- I have no objection to combining the current forms AMS 5&6 into one report and certificate, with boxes to clarify MMI and Special Evaluation. However, the current draft form is cumbersome and would benefit from improvements.
- The proposed new table under Impairment Rating and Calculation considers only the Permanent Impairment Compensation calculation (formerly Schedule 2). It makes no provision for Common Law calculations, which do not require the item number conversion formula. I would suggest keeping the current table as contained in the AMS 5 form for the basic calculation (expressed as WPI or regional impairment according to AMA5/WC4 guidelines) and ADDING a second table to be used *only* for PIC calculations requiring the WorkCover conversion formula. This will 'clean up' the form significantly in my view.
- In the Certificate section, under Permanent Impairment Compensation I would recommend making provision for multiple item numbers, as this occurs commonly (it can be 4 or 5 item numbers in complex injuries). This will require space over a number of lines to fill in the relevant percentage, item number and description.
- I would replace the current "&" symbol with "," (for the description of the item number).

### 7.1 WCWA Guidelines for the Evaluation of Permanent Impairment – consultation draft October 2023

- I would recommend keeping the current chapter and section numbers rather than re-numbering the entire Guidelines document for the sake of ease, clarity and consistency. This will reduce complexity for the APIA as it will make clear which chapter (and thereby body region) a section refers to.
- As it stands, the current draft document has retained a number of references to previous section numbers whilst that section no longer exists in the new numbering
  - E.g. under Table 4.2, the assessor is referred to section 4.27 whereas the new numbering would have this as section 174
  - E.g. Table 14.1 (TEMSKI) footnote refers to section 14.8, whereas the new numbering has this as section 339.
  - There are numerous other examples (e.g. in Chapters 6, 7, & 8) leading to confusion as it currently stands.
- The definition of radiculopathy under (new) section 174 (previously 4.27) does not have the relevant criteria in **bold** print, despite this being a major and important requirement.
- Chapter 8, (new) section 242 – ensure reference to PC<sup>20</sup> uses superscript for clarity of meaning.

- Appendix 2 – there is reference to a case study #7 on page 101, but this page number has changed (currently 108).
- I would suggest using this opportunity to correct an error contained in Table 5.1 - Criteria for Rating Miscellaneous Peripheral Nerves. As covered in the WorkCover AMS training course, the 1% column heading should read “sensory **alteration**” not “sensory loss”.

#### **8. Implementation Consultation – Approval of Permanent Impairment Assessors**

- APiA approval criteria: I would recommend making these firmer to ensure good quality APiA assessments and reports, as follows:
  2. Have at least 5 years post-graduate experience which includes managing injured workers under Workers Compensation
  3. Provide evidence of current clinical practice AND expertise in assessment (remove “or”).
  5. For medical practitioners who are not specialists, I would recommend specifying a minimum period of injury management experience, e.g. a minimum of 3 years in which the majority of clinical cases involve 1) managing injured workers under the Workers Compensation system *and* 2) providing medical reports to third parties involved in the claims process. This should be demonstrated before they can be eligible to participate in the WorkCover WA impairment assessment training module.

Thank you.

Dr Steven Overmeire

30 November 2023