

# COMPLIANCE AUDIT REPORT

STATE OF MAINE  
WORKERS' COMPENSATION BOARD



**National Interstate Insurance Group**  
**Engagement Date: July 25, 2018**  
**Issue Date: July 17, 2019**

**Office of Monitoring, Audit & Enforcement**

John C. Rohde  
Executive Director

# CONTENTS

SUMMARY .....	1
◆ Form filing.....	2
◆ Timeliness of benefit payments .....	4
◆ Accuracy of indemnity payments .....	5
◆ Accuracy of medical payments.....	6
◆ Other significant issues.....	7
PENALTIES .....	8
◆ Penalties payable to providers and/or injured employees.....	8
Title 39-A M.R.S.A. Section 205(3).....	8
◆ Penalties payable to the State General Fund.....	9
Title 39-A M.R.S.A. Section 359(2).....	9
Title 39-A M.R.S.A. Section 360(1)(A).....	10
Title 39-A M.R.S.A. Section 360(1)(B).....	11
Title 39-A M.R.S.A. Section 360(2).....	12
COMPLIANCE TABLES.....	13
◆ Form Filing.....	13
A. First Report of Occupational Injury or Disease (WCB-1).....	13
B. Wage Statement (WCB-2).....	13
C. Fringe Benefits Worksheet (WCB-2B).....	13
D. Memorandum of Payment (WCB-3 or WCB-4A).....	13
E. Discontinuance or Modification of Compensation (WCB-4 or WCB-4A) .....	14
F. Certificate of Discontinuance or Reduction of Compensation (WCB-8 or WCB-4A) .....	14
G. Notice of Controversy (WCB-9) .....	14
H. Statement of Compensation Paid (WCB-11).....	14
◆ Timeliness of Benefit Payments .....	15
I. Initial Payment of Indemnity Benefits.....	15
J. Subsequent Payment of Indemnity Benefits.....	15
K. Medical Payments.....	15
L. Payment of Approved Agreements, Orders, Decisions .....	15
◆ Accuracy of Indemnity Payments.....	16
M. Average Weekly Wage .....	16
N. Weekly Compensation Rate .....	16
O. Partial Benefits.....	16
P. Amount Paid .....	16
◆ Accuracy of Medical Payments .....	17
Q. Amount Paid .....	17

## SUMMARY

The National Interstate Insurance group of affiliated companies (collectively NIIG, which includes National Interstate Insurance Company (NIIC), Vanliner Insurance Company (Vanliner) and Triumph Casualty Company (Triumph)) provide a wide variety of business insurance products including workers' compensation.

The Audit Division of the Maine Workers' Compensation Board (Board) examined eleven (11) claim files where indemnity benefits were paid for the period under examination (2015-2017) as well as fifty-nine (59) medical payments for the period under examination (2015-2017) to determine compliance with statutory and regulatory requirements in the following areas:

- Form filing
- Timeliness of benefit payments
- Accuracy of benefit payments

The claim sample was drawn from a listing of all of NIIG's 2015-2017 Maine workers' compensation claims. The medical payment sample was drawn from a listing of all of NIIG's 2015-2017 medical payments for those claims in the sample.

NIIC and Vanliner handle Maine workers' compensation claims in Richfield, Ohio and Fenton, Missouri respectively. Both companies also employ Interstate Adjustment Service, Inc., located in Rhode Island, as a non-resident adjusting firm. In addition, NIIC and Vanliner utilize the services of Douglas Alofs, Esq. as a claims agent within the State, although none of the claims under review were adjusted by Attorney Alofs nor were any handled by Triumph.

The audit work was conducted as a desk audit.

The compliance tables found on pages 13 through 17 of this report are representative of Board findings as of July 25, 2018. Since that time, the Audit Division has received additional information, missing form filings, form corrections, indemnity payments and adjustments.

Following is a discussion of the aforementioned compliance tables and of the steps taken since July 25, 2018 to rectify identified noncompliance issues. This discussion also includes other significant issues identified by the audit.

◆ **Form filing**

- Title 39-A M.R.S.A. and the Board Rules and Regulations provide the requirements for reports to the Board:

<i>WCB-1, First Report of Occupational Injury or Disease</i>	<i>39-A M.R.S.A. Section 303, Rules &amp; Regs, Ch 8 Section 13, Rules &amp; Regs, Ch 3 Section 4</i>
<i>WCB-2, Wage Statement</i>	<i>39-A M.R.S.A. Section 303</i>
<i>WCB-2B, Fringe Benefits Worksheet</i>	<i>39-A M.R.S.A. Section 303</i>
<i>WCB-3, Memorandum of Payment (MOP)</i>	<i>Rules &amp; Regs, Ch 1 Section 1.1, Rules &amp; Regs, Ch 1 Section 1.3, 39-A M.R.S.A. Section 205(7), Rules &amp; Regs, Ch 8 Section 12</i>
<i>WCB-4, Discontinuance or Modification of Compensation</i>	<i>Rules &amp; Regs, Ch 8 Section 11, Rules &amp; Regs, Ch 8 Section 12</i>
<i>WCB-4A, Consent Between Employer and Employee</i>	<i>Rules &amp; Regs, Ch 8 Section 18</i>
<i>WCB-8, (21 Day) Certificate of Discontinuance or Reduction of Compensation</i>	<i>39-A M.R.S.A. Section 205(9)</i>
<i>WCB-9, Notice of Controversy (NOC)</i>	<i>Rules &amp; Regs, Ch 1 Section 1.1, Rules &amp; Regs, Ch 3 Section 4</i>
<i>WCB-11, Statement of Compensation Paid</i>	<i>Rules &amp; Regs, Ch 8 Section 1, Rules &amp; Regs, Ch 8 Section 12</i>

- Failure to file any Board form within established time frames is a violation of Title 39-A M.R.S.A. Section 360(1) (A) or (B).
- First Report of Occupational Injury or Disease (WCB-1):
  - Ten (10) First Report of Occupational Injury or Disease forms were filed in accordance with the above requirements.
    - NIIG’s compliance rate for First Report of Occupational Injury or Disease filings is 91%, which is above the Board’s performance benchmark of 85%.
  - One (1) First Report of Occupational Injury or Disease form was filed late.
- Wage Statement (WCB-2) and Fringe Benefits Worksheet (WCB-2B):
  - Seven (7) Wage Statements and seven (7) Fringe Benefits Worksheets were filed in accordance with the above requirements.
  - Five (5) Wage Statements and five (5) Fringe Benefits Worksheets were filed late.
  - One (1) Wage Statement and one (1) Fringe Benefits Worksheet were required, but not filed.
    - Since July 25, 2018, NIIG submitted that one (1) Wage Statement and that one (1) Fringe Benefits Worksheet.

- Memorandum of Payment (WCB-3 or WCB-4A) and Notice of Controversy (WCB-9):
  - Twelve (12) Memorandum of Payment forms and three (3) Notice of Controversy (“lost time”) forms were filed in accordance with the above requirements.
    - NIIG’s compliance rate for Memorandum of Payment filings is 86%, which is above the Board’s performance benchmark of 85%.
    - NIIG’s compliance rate for Notice of Controversy filings is 100%, which is above the Board’s performance benchmark of 90%.
  - One (1) Memorandum of Payment form was filed late.
  - One (1) Memorandum of Payment form was required, but not filed.
    - Since July 25, 2018, NIIG submitted that one (1) Memorandum of Payment form.
- Discontinuance or Modification of Compensation (WCB-4 or WCB-4A):
  - Twelve (12) Discontinuance or Modification of Compensation forms were filed in accordance with the above requirements.
  - One (1) Consent Between Employer and Employee (WCB-4A) form was filed in lieu of a WCB-4.
  - Three (3) Discontinuance or Modification of Compensation forms were filed late.
- (21 Day) Certificate of Discontinuance or Reduction of Compensation (WCB-8 or WCB-4A):
  - Four (4) (21 Day) Certificate of Discontinuance or Reduction of Compensation forms were filed in accordance with the above requirements.
- Statement of Compensation Paid (WCB-11):
  - Ten (10) Statement of Compensation Paid forms were filed in accordance with the above requirements.
  - Seven (7) Statement of Compensation Paid forms were required, but not filed.

◆ **Timeliness of benefit payments**

- Title 39-A M.R.S.A. Section 205(2) provides the time requirements for indemnity payments.
- When there is not an ongoing dispute, failure to pay weekly compensation benefits or accrued weekly benefits within 30 days after becoming due and payable is a violation of Title 39-A M.R.S.A. Section 205(2) and subject to penalty under Section 205(3).
- Initial Indemnity Payments:
  - Thirteen (13) initial indemnity payments were made timely.
    - NIIG's compliance rate for initial indemnity payments is 93%, which is above the Board's performance benchmark of 87%.
  - One (1) initial indemnity payment was made late.
    - That one (1) late initial indemnity payment was made later than 30 days after it became due and payable, in violation of Section 205(2) and subject to penalty under Section 205(3).
- Subsequent Indemnity Payments:
  - Seventy-eight (78) subsequent indemnity payments were made timely.
  - Twenty-six (26) subsequent indemnity payments were made late.
- Board Rules and Regulations Chapter 5 states in part, "The employer/insurer shall pay the health care provider's charge or the maximum allowable payment under this fee schedule, whichever is less, within 30 days of receipt of a bill unless the bill or previous bills from the same provider or the underlying injury has been controverted or denied. If an employer/insurer controverts whether a health care provider's bill is reasonable and proper under § 206 of the Act, the employer/insurer shall send a copy of the notice of controversy to the health care provider."
  - Fifty-three (53) medical payments were made timely.
  - Six (6) medical payments were made late.
- Title 39-A M.R.S.A. Section 324(1) provides the requirements for compensation payments per an approved agreement, order or decision. Board Rules and Regulations Chapter 8, Section 18.2 provides the requirements for compensation payments per a Consent Between Employer and Employee (WCB-4A).
  - Three (3) mediation agreements, one (1) Consent Between Employer and Employee and two (2) Decisions were paid timely.

#### ◆ Accuracy of indemnity payments

- Title 39-A M.R.S.A. Section 102(4) and Board Rules and Regulations Chapter 1, Section 5 provide the requirements for calculating average weekly wages (AWWs). Title 39-A M.R.S.A. Section 102(1) and Board Rules and Regulations Chapter 8, Section 9 provides the requirements for determining weekly compensation rates (WCRs). Title 39-A M.R.S.A. Sections 212, 213, and 215 provide the requirements for compensation for total incapacity, partial incapacity, and death benefits.
- The accuracy of indemnity payments was reviewed for eleven (11) claims.
- Average Weekly Wage:
  - Seven (7) AWWs were correct.
  - Four (4) AWWs were incorrect.
- Weekly Compensation Rate:
  - Seven (7) WCRs were correct.
  - Four (4) WCRs were incorrect.
- Partial Benefits Calculation Method:
  - The method used to calculate partial benefits was correct for six (6) claims.
  - The method used to calculate partial benefits was incorrect for one (1) claim.
- Amount Paid:
  - Two (2) claims were compensated correctly.
  - Six (6) claims were underpaid (\$2,287.07 aggregately).
    - Since July 25, 2018, NIIG paid the amounts due.
  - Three (3) claims were overpaid (\$379.61 aggregately).
  - Collectively, the aforementioned errors resulted in a net underpayment of \$1,907.46 to injured workers.

◆ **Accuracy of medical payments**

- Title 39-A M.R.S.A. Section 209-A and Board Rules and Regulations Chapter 5, provide the fee setting requirements for medical and ancillary services and products rendered by individual health care practitioners and health care facilities.
- The accuracy of medical payments was reviewed for nine (9) claims.
- Amount Paid:
  - Medical payments sampled for seven (7) claims were correct.
  - Medical payments sampled for two (2) claims were incorrect.



◆ **Other significant issues**

- Box 22 (First Day Of Compensability After Waiting Period Is Met) of the WCB-3, Memorandum of Payment (MOP) must accurately reflect the date of the first compensable day that follows the completion of the 7-day waiting period. See the Board's Forms and Petitions Manual.
  - Incorrect dates were reported in Box 22 of the MOPs that were filed for nine (9) claims.
- Boxes 23a (Date of Incapacity) and 23b (Date Employer Notified) of the WCB-3, Memorandum of Payment (MOP) must accurately reflect the date of incapacity and date that the employer was notified of the incapacity. Note: the Date of Incapacity reported in Box 23a and the Date Employer Notified in Box 23b must equal the Date of Incapacity (DN56) and Date Employer Notified (DN281) reported in box 43 of the WCB-1, Employer's First Report of Occupational Injury or Disease (First Report). See the Board's Forms and Petitions Manual.
  - Incorrect dates were reported in Boxes 23a and/or 23b of the MOPs that were filed for four (4) claims.
- Box 24 (Date Check Mailed) of the WCB-3, Memorandum of Payment (MOP) must accurately reflect the date that the initial indemnity payment (for the incapacity addressed by the MOP) is sent to the employee. See the Board's Forms and Petitions Manual.
  - Incorrect dates were reported in Box 24 of the MOPs that were filed for four (4) claims.
- Box 19b (To (Return Date)) of the WCB-4, Discontinuance or Modification of Compensation must accurately reflect the date the incapacity ended. See the Board's Forms and Petitions Manual.
  - Incorrect dates were reported in Box 19b of the WCB-4, Discontinuance or Modification of Compensation forms that were filed for three (3) claims.
- If no order or award of compensation or compensation scheme has been entered, the employer, insurer or group self-insurer may discontinue or reduce benefits by sending a certificate by certified mail to the employee and to the Board, together with any information on which the employer, insurer or group self-insurer relied to support the discontinuance or reduction. The employer may discontinue or reduce benefits no earlier than 21 days from the date the certificate was mailed to the employee, except that benefits paid pursuant to section 212, subsection 1 or section 213, subsection 1 may be discontinued or reduced based on the amount of actual documented earnings paid to the employee during the 21-day period if the employer files with the Board the documentation or evidence that substantiates the earnings and the employer only reduces or discontinues benefits for any week for which it possesses evidence of such earning. The certificate must advise the employee of the date when the employee's benefits will be discontinued or reduced, as well as other information as prescribed by the Board, including the employee's appeal rights. See Title 39-A M.R.S.A. Section 205(9)(B)(1).
  - The auditor could not verify that 21-days' notice was given as the senders did not obtain a post-marked sender's receipt on three (3) claims.

## PENALTIES

### ◆ Penalties payable to providers and/or injured employees

#### **Title 39-A M.R.S.A. Section 205(3)**

“When there is not an ongoing dispute, if weekly compensation benefits or accrued weekly benefits are not paid within thirty (30) days after becoming due and payable, \$50 per day must be added and paid to the worker for each day over thirty (30) days in which the benefits are not paid. Not more than \$1,500 in total may be added pursuant to this subsection. For purposes of ratemaking, daily charges paid under this subsection do not constitute elements of loss.”

A delay of an initial indemnity payment, subject to penalty under Section 205(3), was found on the following claim:

CLAIM	PENALTY JUSTIFICATION	PENALTY EXPOSURE
Heather Esty vs. Student Transportation of America Date of Injury: 9/25/17 Date ER Notified of Incapacity: 10/2/17 Claim # 1276357 Board # 17022123	No NOC was filed, and the initial indemnity payment was made 1/4/18, which was 34 days after compensation became due and payable (12/1/17).	\$200.00*
<b>Total Penalties to Injured Employees for Delays of Initial Indemnity Payments</b>		<b>\$200.00</b>

\* Paid.

Delays of “other” indemnity payments, subject to penalty under Section 205(3), were found on the following claims:

CLAIM	PENALTY JUSTIFICATION	PENALTY EXPOSURE
Angela Beasley vs. Student Transportation of America Date of Injury: 10/19/16 Date ER Notified of Incapacity: 10/27/16 Claim # 1247196 Board # 16023005	The claimant was totally incapacitated from 10/27/16 through 4/12/17. Payment for sixteen (16) days of that incapacity was made 5/22/19, which was 756 days after compensation became due and payable (4/26/17).	\$1,500.00
Heather Esty vs. Student Transportation of America Date of Injury: 9/25/17 Date ER Notified of Incapacity: 10/2/17 Claim # 1276357 Board # 17022123	The claimant’s benefits were improperly discontinued on 12/23/17. Payment of accrued benefits has not yet been made.	\$1,500.00

CLAIM	PENALTY JUSTIFICATION	PENALTY EXPOSURE
Laurie Ryan vs. Student Transportation of America Date of Injury: 1/30/17 Date ER Notified of Incapacity: 1/30/17 Claim # 1255583 Board # 17001978	Payment for five (5) days of the 7-day waiting period (1/31/17 through 2/4/17) was made 5/22/19, which was 823 days after compensation became due and payable (2/18/17).  The claimant's benefits were improperly discontinued on 3/11/17. Payment of accrued benefits was made 5/22/19, which was 788 days after compensation became due and payable (3/25/17).	\$1,500.00
<b>Total Penalties to Injured Employees for Delays of "Other" Indemnity Payments</b>		<b>\$4,500.00</b>

◆ **Penalties payable to the State General Fund**

**Title 39-A M.R.S.A. Section 359(2)**

“In addition to any other penalty assessment permitted under this Act, the Board may assess civil penalties not to exceed \$25,000 upon finding, after hearing, that an employer, insurer or 3<sup>rd</sup>-party administrator for an employer has engaged in a pattern of questionable claims-handling techniques or repeated unreasonably contested claims. The Board shall certify its findings to the Superintendent of Insurance, who shall take appropriate action so as to bring any such practices to a halt. This certification by the Board is exempt from the provisions of the Maine Administrative Procedure Act. The amount of any penalty assessed pursuant to this subsection must be directly related to the severity of the pattern of questionable claims-handling techniques or repeated unreasonably contested claims. All penalties collected pursuant to this subsection shall inure to the benefit of the General Fund. An insurance carrier’s payment of any penalty assessed under this section may not be considered an element of loss for the purpose of establishing rates for workers' compensation insurance.”

- No action will be taken at this time.

To avoid future penalty referral(s) under Section 359(2) and/or 360(2), NIIG must take corrective measures to address the following inadequacies:

- Failure to file or timely file forms with the Board
- Failure to pay or timely pay benefits
- Failure to pay benefits accurately
- Failure to address compliance issues outlined in previous audits (includes separate audits for NIIC & Vanliner)

**Title 39-A M.R.S.A. Section 360(1)(A)**

“The Board may assess a civil penalty not to exceed \$100 for each violation on any person: Who fails to file or complete any report or form required by this Act or rules adopted under this Act.”

Violations subject to penalty under Section 360(1)(A) were found on the following claims:

<b>Employee</b>	<b>Date of Injury</b>	<b>Forms Not Filed</b>	<b>Penalty Exposure</b>
	10/19/16	WCB-11, Statement of Compensation Paid	\$100.00
	5/11/17	WCB-11, Statement of Compensation Paid	\$100.00
	1/30/17	WCB-11, Statement of Compensation Paid	\$100.00
	9/25/17	WCB-11, Statement of Compensation Paid	\$100.00
	1/30/17	WCB-11, Statement of Compensation Paid	\$100.00
	12/5/16	WCB-11, Statement of Compensation Paid (2)	\$200.00
<b>TOTAL</b>			<b>\$700.00</b>

**Title 39-A M.R.S.A. Section 360(1)(B)**

“The Board may assess a civil penalty not to exceed \$100 for each violation on any person: Who fails to file or complete such a report or form within the time limits specified in this Act or rules adopted under this Act.”

Violations subject to penalty under Section 360(1)(B) were found on the following claims:

<b>Employee</b>	<b>Date of Injury</b>	<b>Forms Filed Late</b>	<b>Penalty Exposure</b>
	10/19/16	WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
	5/11/17	WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
		WCB-4, Discontinuance or Modification of Compensation	\$100.00
	9/25/17	WCB-1, Employer's First Report of Occupational Injury or Disease	\$100.00*
		WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
		WCB-3, Memorandum of Payment	\$100.00
	6/22/17	WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
	1/27/16	WCB-2, Wage Statement	\$100.00
		WCB-2B, Fringe Benefits Worksheet	\$100.00
	1/30/17	WCB-2, Wage Statement-Concurrent ER	\$100.00
		WCB-2B, Fringe Benefits Worksheet - Concurrent ER	\$100.00
		WCB-4, Discontinuance or Modification of Compensation (2)	\$200.00
	12/5/16	WCB-3, Memorandum of Payment	\$100.00
<b>TOTAL</b>			<b>\$1,800.00</b>

\* Pending AIU.

**Title 39-A M.R.S.A. Section 360(2)**

“The Board may assess, after hearing, a civil penalty in an amount not to exceed \$1,000 for an individual and \$10,000 for a corporation, partnership or other legal entity for any willful violation of this Act, fraud or intentional misrepresentation. The Board may also require that person to repay any compensation received through a violation of this Act, fraud or intentional misrepresentation or to pay any compensation withheld through a violation of this Act, fraud or misrepresentation, with interest at the rate of 10% per year.”

- No action will be taken at this time.

To avoid future penalty referral(s) under Section 359(2) and/or 360(2), NIIG must take corrective measures to address the following inadequacies:

- Failure to file or timely file forms with the Board
- Failure to pay or timely pay benefits
- Failure to pay benefits accurately
- Failure to address compliance issues outlined in previous audits (includes separate audits for NIIC & Vanliner)

## COMPLIANCE TABLES

### ◆ Form Filing

#### A. First Report of Occupational Injury or Disease (WCB-1)

		2015-2017	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	10	91%
Late		1	9%
Total		11	100%

#### B. Wage Statement (WCB-2)

		2015-2017	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	7	54%
Late		5	38%
Not Filed		1	8%
Total		13	100%

#### C. Fringe Benefits Worksheet (WCB-2B)

		2015-2017	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	7	54%
Late		5	38%
Not Filed		1	8%
Total		13	100%

#### D. Memorandum of Payment (WCB-3 or WCB-4A)

		2015-2017	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	12	86%
Late		1	7%
Not Filed		1	7%
Total		14	100%

**E. Discontinuance or Modification of Compensation (WCB-4 or WCB-4A)**

<b>2015-2017</b>			
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	13	81%
Late		3	19%
Total		16	100%

**F. Certificate of Discontinuance or Reduction of Compensation (WCB-8 or WCB-4A)**

<b>2015-2017</b>			
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	4	100%
Total		4	100%

**G. Notice of Controversy (WCB-9)**

<b>2015-2017</b>			
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	3	100%
Total		3	100%

**H. Statement of Compensation Paid (WCB-11)**

<b>2015-2017</b>			
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	10	59%
Not Filed		7	41%
Total		17	100%



◆ **Timeliness of Benefit Payments**

**I. Initial Payment of Indemnity Benefits**

			<b>2015-2017</b>	
			Number	Percent
Check Issued Within:				
0-14	Days	<b>Compliant</b>	13	93%
45+	Days		1	7%
Total			14	100%

**J. Subsequent Payment of Indemnity Benefits**

			<b>2015-2017</b>	
			Number	Percent
Check Issued Within:				
0-7	Days	<b>Compliant</b>	78	75%
8-37	Days		26	25%
Total			104	100%

**K. Medical Payments**

			<b>2015-2017</b>	
			Number	Percent
Check Issued Within:				
0-30	Days	<b>Compliant</b>	53	90%
31+	Days		6	10%
Total			59	100%

**L. Payment of Approved Agreements, Orders, Decisions**

			<b>2015-2017</b>	
			Number	Percent
Check Issued Within:				
0-10	Days	<b>Compliant</b>	6	100%
Total			6	100%

◆ Accuracy of Indemnity Payments

M. Average Weekly Wage

		2015-2017	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	7	64%
Incorrect		4	36%
Total		11	100%

N. Weekly Compensation Rate

		2015-2017	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	7	64%
Incorrect		4	36%
Total		11	100%

O. Partial Benefits

		2015-2016	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	6	86%
Incorrect		1	14%
Total		7	100%

P. Amount Paid

		2015-2017	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	2	18%
Underpaid		6	55%
Overpaid		3	27%
Total		11	100%

◆ Accuracy of Medical Payments

Q. Amount Paid

		2015-2017	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	7	78%
Incorrect		2	22%
Total		9	100%