

# COMPLIANCE AUDIT REPORT

STATE OF MAINE  
WORKERS' COMPENSATION BOARD



**Old Republic Insurance Company**  
**Engagement Date: October 18, 2016**  
**Issue Date: January 31, 2019**

**Office of Monitoring, Audit & Enforcement**

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## SUMMARY

Old Republic Insurance Company (Old Republic) provides a wide variety of business insurance products including workers' compensation.

The Audit Division of the Maine Workers' Compensation Board (Board) examined forty-three (43) claim files where indemnity benefits were paid for the period under examination (2014-2015) as well as fifty-eight (58) medical payments for the period under examination (2014-2015) to determine compliance with statutory and regulatory requirements in the following areas:

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

The claim sample was drawn from a listing of all of Old Republic's 2014-2015 Maine workers' compensation claims. The medical payment sample was drawn from a listing of all of Old Republic's 2014-2015 medical payments for those claims in the sample.

Old Republic utilizes the services of several third party administrators to administer its Maine claims. Old Republic also utilizes the services of Joan Marquis of Sedgwick Claims Management Services, Inc. as its claims agent within the State, although none of the claims under review were adjusted by Ms. Marquis.

The audit work was conducted as a desk audit.

The compliance tables found on pages 14 through 18 of this report are representative of Board findings as of October 18, 2016. 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 October 18, 2106 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-2A, Schedule of Dependents and Filing Status</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):
  - Three (3) First Report of Occupational Injury or Disease forms were filed in accordance with the above requirements.
    - Old Republic’s compliance rate for First Report of Occupational Injury or Disease filings is 60%, which is below the Board’s performance benchmark of 85%.
  - Two (2) First Report of Occupational Injury or Disease forms were filed late.
- Wage Statement (WCB-2) and Fringe Benefits Worksheet (WCB-2B):
  - Three (3) Wage Statements and two (2) Fringe Benefits Worksheets were filed in accordance with the above requirements.
  - Two (2) Wage Statements and three (3) Fringe Benefits Worksheets were filed late.

- Memorandum of Payment (WCB-3 or WCB-4A):
  - Two (2) Memorandum of Payment forms were filed in accordance with the above requirements.
    - Old Republic's compliance rate for Memorandum of Payment filings is 40%, which is below the Board's performance benchmark of 85%.
  - Three (3) Memorandum of Payment forms were filed late.
- Discontinuance or Modification of Compensation (WCB-4 or WCB-4A):
  - Four (4) Discontinuance or Modification of Compensation forms were filed in accordance with the above requirements.
  - Two (2) Discontinuance or Modification of Compensation forms were filed late.
  - Two (2) Discontinuance or Modification of Compensation forms were required, but not filed.
    - Since October 18, 2016, Old Republic submitted those two (2) Discontinuance or Modification of Compensation forms.
- Statement of Compensation Paid (WCB-11):
  - Eight (8) Statement of Compensation Paid forms were filed in accordance with the above requirements.
  - One (1) Statement of Compensation Paid form was filed late.

◆ **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:
  - Fifty (50) initial indemnity payments were made timely.
    - Old Republic's compliance rate for initial indemnity payments is 85%, which is below the Board's performance benchmark of 87%.
  - Nine (9) initial indemnity payments were made late.
    - 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:
  - Eight hundred thirty-five (835) subsequent indemnity payments were made timely.
  - Sixty-eight (68) subsequent indemnity payments were made late.
    - One (1) late subsequent 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).
- 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-six (56) medical payments were made timely.
  - Two (2) 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).
  - One (1) provisional order, one (1) mediation agreement and one (1) decree 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 forty-three (43) claims.
- Average Weekly Wage:
  - Thirty-one (31) AWWs were correct.
  - Twelve (12) AWWs were incorrect.
- Weekly Compensation Rate:
  - Thirty-one (31) WCRs were correct.
  - Twelve (12) WCRs were incorrect.
- Partial Benefits Calculation Method:
  - The method used to calculate partial benefits was correct for fourteen (14) claims.
  - The method used to calculate partial benefits was incorrect for eleven (11) claims.
- Amount Paid:
  - Ten (10) claims were compensated correctly.
  - Fourteen (14) claims were underpaid (\$42,290.37 aggregately).
    - Since October 18, 2016, Old Republic resolved the above underpayment issues.
  - Nineteen (19) claims were overpaid (\$7,693.98 aggregately).
  - Collectively, the aforementioned errors resulted in a net underpayment of \$34,596.39 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 twenty-three (23) claims.
- Amount Paid:
  - Medical payments sampled for nineteen (19) claims were correct.
  - Medical payments sampled for four (4) claims were incorrect.

◆ **Other significant issues**

- Every insurance company insuring employers under this Act shall fill out any blanks and answer all questions submitted that may relate to policies, premiums, amount of compensation paid and such other information as the Board or the Superintendent of Insurance may determine important, either for the proper administration of this Act or for statistical purposes. See Title 39-A M.R.S.A. Section 357.
- The auditor noted that Box 18 and/or Box 19 of the WCB-2, Wage Statement were not filled out for five (5) claims.
- The auditor noted that the WCB-2B, Fringe Benefits Worksheet was missing required information for nine (9) claims.
- 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 fourteen (14) 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 eight (8) claims.
- Additional payments were made since the "Final" WCB-11 Statement of Compensation Paid was filed for five (5) 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
Dale Waterman vs. Casella Waste Systems, Inc. Date of Injury: 11/3/15 Date ER Notified of Incapacity: 12/7/15 Claim # 15D14G327898 Board # 15028354	No NOC was filed, and the initial indemnity payment was made 2/1/16, which was 42 days after compensation became due and payable (12/21/15).	\$600.00*
<b>Total Penalties to Injured Employees for Delays of Initial Indemnity Payments</b>		<b>\$600.00</b>

\* Paid.

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

CLAIM	PENALTY JUSTIFICATION	PENALTY EXPOSURE
Debra Larracey vs. American National Red Cross Date of Injury: 6/17/14 Date ER Notified of Incapacity: 9/19/14 Claim # 301423512480001 Board # 14011819	A subsequent indemnity payment was made 2/19/16, which was 43 days after the previous indemnity payment (1/7/16).	\$300.00
<b>Total Penalties to Injured Employees for Delays of Subsequent Indemnity Payments</b>		<b>\$300.00</b>

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

CLAIM	PENALTY JUSTIFICATION	PENALTY EXPOSURE
<p>Joseph Dechaine vs. Twin Rivers Paper Company LLC  Date of Injury: 4/1/15  Date ER Notified of Incapacity: 4/23/15  Claim # 301538489830001  Board # 15007650</p>	<p>The claimant’s benefits were improperly discontinued effective 1/21/16. Payment of accrued benefits has not yet been made.</p>	<p>\$1,500.00*</p>
<p>Rodney Haney vs. YRC Worldwide  Date of Injury: 9/10/14  Date ER Notified of Incapacity: 9/11/14  Claim # 301427533520001  Board # 14018876</p>	<p>The claimant was totally incapacitated from 1/4/16 through 1/11/16. Payment for that incapacity was made 6/19/17, which was 511 days after compensation became due and payable (1/25/16).</p>	<p>\$1,500.00</p>
<p>Ronald Marston vs. Land O’Lakes, Inc.  Date of Injury: 2/24/15  Date ER Notified of Incapacity: 2/25/15  Claim # 186959033-001  Board # 15003581</p>	<p>The claimant was totally incapacitated from 6/17/15 through 6/24/15. Payment for one (1) day of that incapacity was made 5/18/17, which was 680 days after compensation became due and payable (7/8/15).</p>	<p>\$1,500.00*</p>
<p>Scott Packard vs. Brookfield Asset  Date of Injury: 2/26/14  Date ER Notified of Incapacity: 2/27/14  Claim # 001081-001343-WC-01  Board # 14004008</p>	<p>Provisional payments were made for weeks ending 5/6/14, 8/29/14, 9/12/14, 10/10/14, 10/17/14, 11/21/14, 11/28/14, 12/5/14, 12/12/14, 12/19/14 and 3/20/15. Payment of accrued benefits was made 6/21/17, which was 810 days after compensation became due and payable (4/3/15).</p>	<p>\$1,500.00</p>
<p>Dale Perry vs. Arundel Pest  Date of Injury: 1/9/15  Date ER Notified of Incapacity: 1/10/15  Claim # 011428-028956-WC-01  Board # 15000335</p>	<p>Provisional payments were made for weeks ending 4/2/15, 6/18/15 through 7/23/15, 9/10/15, 10/1/15, 12/3/15 and 12/10/15. Payment of accrued benefits was made 6/21/17, which was 545 days after compensation became due and payable (12/24/15).</p>	<p>\$1,500.00</p>
<p>Michael Pflieger vs. YRC Worldwide  Date of Injury: 5/27/15  Date ER Notified of Incapacity: 5/28/15  Claim # 000020512245866  Board # 15010468</p>	<p>Payment for the 7-day waiting period was made 6/15/17, which was 739 days after compensation became due and payable (6/7/15).</p>	<p>\$1,500.00</p>
<p>Kristopher Pike vs. Land O’Lakes, Inc.  Date of Injury: 5/11/14  Date ER Notified of Incapacity: 5/20/14  Claim # 186760705-001  Board # 14010121</p>	<p>The claimant’s benefits were improperly discontinued effective 6/13/14. Payment of accrued benefits was made 5/18/17, which was 1056 days after compensation became due and payable (6/27/14).</p>	<p>\$1,500.00</p>

CLAIM	PENALTY JUSTIFICATION	PENALTY EXPOSURE
Ryan Seames vs. Casella Waste Systems, Inc. Date of Injury: 11/3/15 Date ER Notified of Incapacity: 12/8/15 Claim # 15D14G312939 Board # 15027712	Payment for the 7-day waiting period was made 6/14/17, which was 557 days after compensation became due and payable (12/5/15).	\$1,500.00
Sierra Webber vs. Land O'Lakes, Inc. Date of Injury: 8/29/15 Date ER Notified of Incapacity: 9/1/15 Claim # 188091425-001 Board # 15018344	The claimant was totally incapacitated from 9/1/15 through 12/30/15. Payment for one day (12/8/15) of that incapacity was made 5/18/17, which was 513 days after compensation became due and payable (12/22/15),	\$1,500.00
Douglas Wood vs. Arundel Pest Date of Injury: 11/12/15 Date ER Notified of Incapacity: 11/13/15 Claim # 011428-058256-WC-01 Board # 15024243	Provisional payments were made for the period 11/27/15-11/30/15 and week ending 12/31/15. Payment of accrued benefits was made 6/21/17, which was 524 days after compensation became due and payable (1/14/16).	\$1,500.00
<b>Total Penalties to Injured Employees for Delays of "Other" Indemnity Payments</b>		<b>\$16,500.00</b>

\*This claim has been settled by Lump Sum and the Audit Division is not pursuing penalties (on behalf of the corresponding employee) arising from the violation cited.

## ◆ 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.”

- Old Republic is currently under review by the Maine Bureau of Insurance pursuant to a Consent Agreement executed October 17, 2012 between Old Republic, the Superintendent of Insurance, and the Attorney General’s Office, thus no action will be taken by the Board at this time, and the final Audit Report will be submitted to the Superintendent for review.

To avoid future penalty referral(s) under Section 359(2) by the Board, Old Republic 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

**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>
	7/11/14	WCB-3, Memorandum of Payment	\$100.00
	1/6/15	WCB-2B, Fringe Benefits Worksheet	\$100.00
		WCB-4, Discontinuance or Modification of Compensation	\$100.00
	11/3/15	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
		WCB-4, Discontinuance or Modification of Compensation	\$100.00
	11/3/15	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
		WCB-4, Discontinuance or Modification of Compensation (2)	\$200.00
		WCB-11, Statement of Compensation Paid	\$100.00
<b>TOTAL</b>			<b>\$1,500.00</b>

**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 360(2), Old Republic 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

# COMPLIANCE TABLES

## ◆ Form Filing

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

		2014-2015	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	3	60%
Late		2	40%
Total		5	100%

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

		2014-2015	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	3	60%
Late		2	40%
Total		5	100%

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

		2014-2015	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	2	40%
Late		3	60%
Total		5	100%

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

		2014-2015	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	2	40%
Late		3	60%
Total		5	100%

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

		<b>2014-2015</b>	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	4	50%
Late		2	25%
Not Filed		2	25%
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Total		8	100%
		<hr/>	

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

		<b>2014-2015</b>	
		Number	Percent
Received at the Board:			
Filed	<b>Compliant</b>	8	89%
Late		1	11%
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Total		9	100%
		<hr/>	

◆ **Timeliness of Benefit Payments**

**G. Initial Payment of Indemnity Benefits**

			<b>2014-2015</b>	
			Number	Percent
Check Issued Within:				
0-14	Days	<b>Compliant</b>	50	85%
15-44	Days		8	14%
45+	Days		1	1%
Total			59	100%

**H. Subsequent Payment of Indemnity Benefits**

			<b>2014-2015</b>	
			Number	Percent
Check Issued Within:				
0-7	Days	<b>Compliant</b>	835	92%
8-37	Days		67	7%
38+	Days		1	1%
Total			903	100%

**I. Medical Payments**

			<b>2014-2015</b>	
			Number	Percent
Check Issued Within:				
0-30	Days	<b>Compliant</b>	56	97%
31+	Days		2	3%
Total			58	100%

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

			<b>2014-2015</b>	
			Number	Percent
Check Issued Within:				
0-10	Days	<b>Compliant</b>	3	100%
Total			3	100%

◆ Accuracy of Indemnity Payments

K. Average Weekly Wage

		2014-2015	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	31	72%
Incorrect		12	28%
Total		43	100%

L. Weekly Compensation Rate

		2014-2015	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	31	72%
Incorrect		12	28%
Total		43	100%

M. Partial Benefits

		2014-2015	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	14	56%
Incorrect		11	44%
Total		25	100%

N. Amount Paid

		2014-2015	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	10	23%
Underpaid		14	33%
Overpaid		19	44%
Total		43	100%

◆ Accuracy of Medical Payments

O. Amount Paid

		2014-2015	
		Number	Percent
Calculated:			
Correct	<b>Compliant</b>	19	83%
Incorrect		4	17%
Total		23	100%