



Department of Education

Internal Audit

Workers' Compensation Review

Issue Date: April 2015

Report Number: FY2015-03

CONFIDENTIAL

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Department of Education
Workers' Compensation Review

Executive Summary

AUDIT OF: Workers' Compensation Review	DATE: Fieldwork performed February 2015 - March 2015	AUDIT RATING: Acceptable [] Marginal [X] Unacceptable []
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INTRODUCTION:

In connection with the Department of Education's (DOE) Updated Risk Assessment and Internal Audit Plan approved on August 5, 2014, Internal Audit (IA) performed a "Workers' Compensation Review." The purpose of this project was to ensure 1) workers' compensation processes were in compliance with laws and policies, 2) workers' compensation payments were accurate, reliable and timely, and 3) the workers' compensation processes were operating efficiently and effectively.

BACKGROUND:

The Workers' Compensation (WC) Unit is an operating unit within the Personnel Assistance Branch of the Office of Human Resources (OHR). The WC Unit is tasked with processing all workers' compensation claims for all public schools and offices in the Department as the DOE is self-insured. The state coverage is funded by fringe benefit costs the state pays into a state general fund or federal fund account when each employee is paid each pay period.

The WC Unit consists of one Personnel Program Manager (Supervisor), nine Personnel Management Specialists (Claims Managers) and four Personnel Clerks, of which two are temporary.

The WC Unit performs the following tasks:

- Plans and administers the WC Program for all employees, and student/adult volunteers that are providing services to the department.
- Determines eligibility for WC benefits.
- Processes WC claims and pays for WC benefits as required by WC law.
- Monitors WC activities for effectiveness and efficiency.
- Represents the DOE at Department of Labor and Industrial Relations (DLIR) – Disability Compensation Division hearings.
- Provides staff support to the staff of the Department of the Attorney General on matters relating to appeals at the DLIR – Labor Appeals Board and third-party liability claims.
- Assists with returning claimants back to work as soon as possible and refers claimants to the Return-to-Work Priority Program.
- Ensures compliance with applicable WC laws, related administrative rules, and DOE policies and procedures.
- Plans and administers certain bloodborne pathogens activities for the DOE as follows:
 - Provides and coordinates Hepatitis B vaccinations for all qualified DOE employees.
 - Provides access to bloodborne pathogens training information involving universal precautions.
 - Processes and pays for medical costs related to post-exposure evaluation and follow-up for DOE employees who are exposed to bloodborne pathogens while performing work-related tasks.

The WC Unit follows Hawaii's WC Law which is Chapter 386 of the Hawaii Revised Statutes (HRS). The law provides benefits to employees with work-related injuries or illnesses as the nature of the injury or illness requires. The purpose of the law is to provide an employee who suffers a work-related injury or illness with medical care, wage loss replacement, and permanent disability benefits. It also provides death benefits for

Department of Education Workers' Compensation Review

Executive Summary

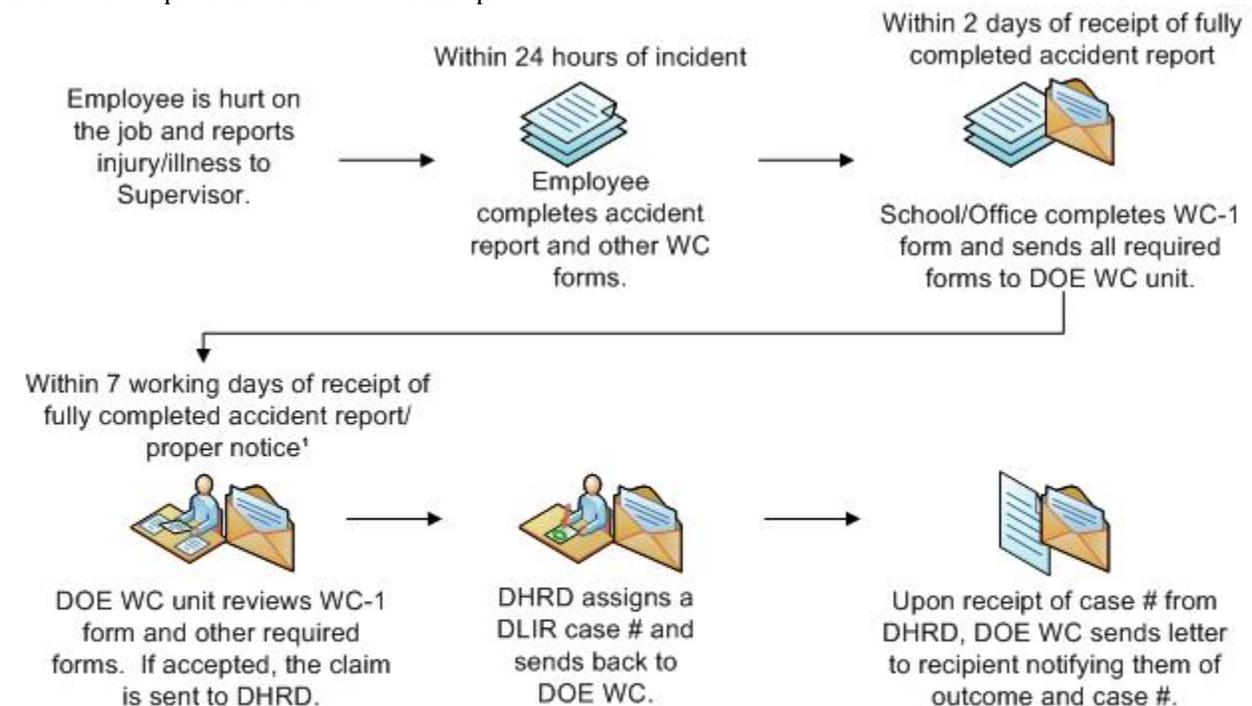
dependents. The benefits most frequently accessed are: 1) Payment of medical expenses and 2) Wage loss replacement benefits that are a portion of wages which is 66 2/3% of the employee's average weekly wage or 52 week period prior to the date of injury. Other WC regulations include Hawaii Administrative Rules (HAR), Chapter 10, Title 12 "Administrative Rules"; HAR, Chapter 15, Title 12 "Workers Compensation Medical Fee Schedule" and HAR, Chapter 14, Title 12 "Rehabilitation."

WC law covers the following individuals:

- Full-time and Part-time employees
- Temporary employees
- 89-day hire casual employees
- Casual hire employees
- Substitute Teachers
- Students in a school-approved work-based learning program (paid or unpaid)
- Volunteers (with some restrictions)

Policies and procedures governing WC processes are found in various forms which include internal training documents, process flow charts, School Administrative Services Assistant (SASA) Academy course materials, School Code 5504 and various memos and notices posted in Lotus Notes.

Below are depictions of the WC claims process:



Key:

DOE WC – Department of Education Workers' Compensation Unit

DHRD – State of Hawaii (SOH) Department of Human Resources (as representatives for DLIR)

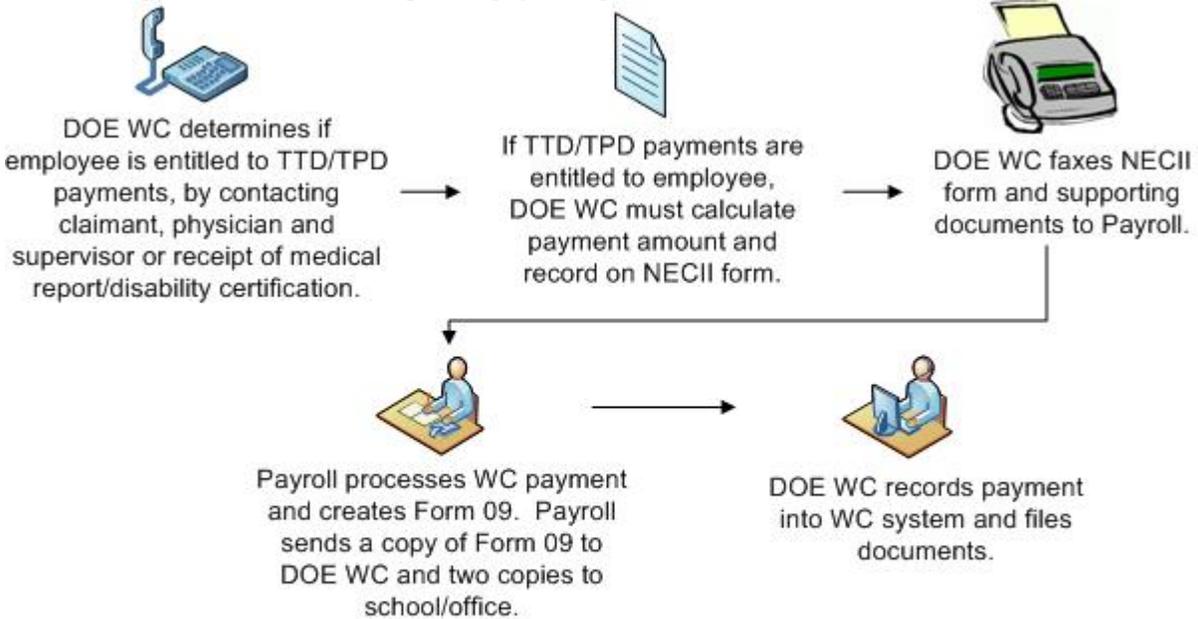
DLIR – SOH Department of Labor and Industrial Relations

¹Proper notice includes all information needed to complete WC-1 form

Department of Education
Workers' Compensation Review

Executive Summary

Below are depictions of the WC wage loss payment process:

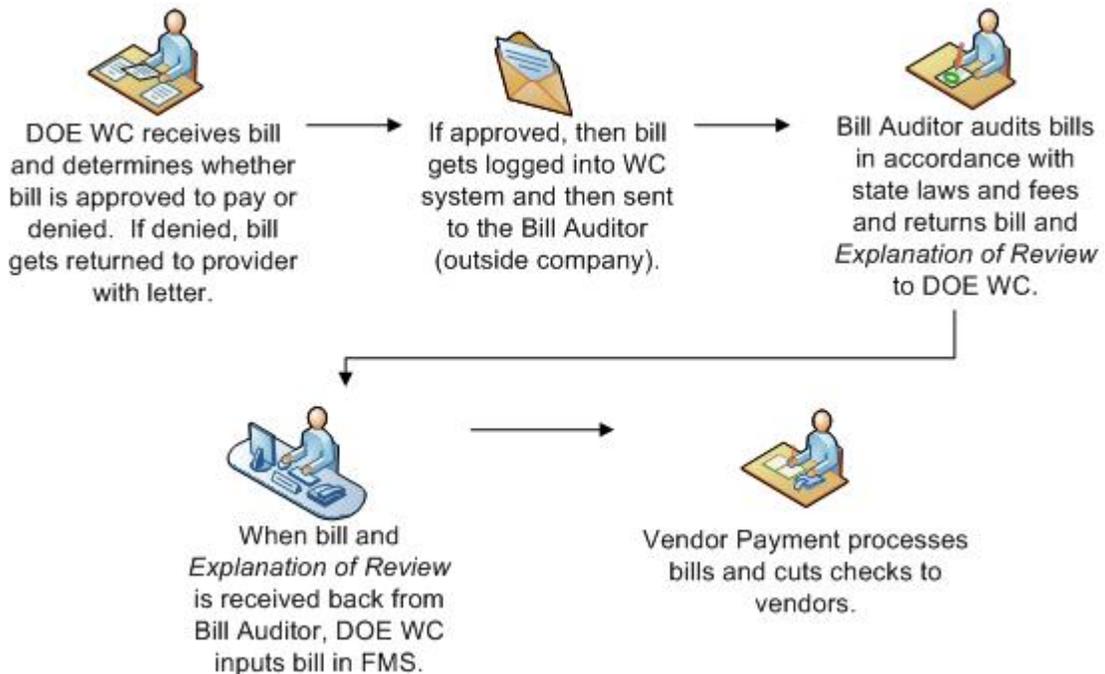


Key:

TTD/TPD – Temporary Total Disability/Temporary Partial Disability (wage loss payments)

NECII – "Notification and Election of Compensation for Industrial Injury", Form DOE OHR 900-003

Below are depictions of the WC medical vendor payment process:



Department of Education
Workers' Compensation Review

Executive Summary

SCOPE and OBJECTIVES:

The scope of our review included an examination of the WC process. We reviewed the design and operating effectiveness of the existing control procedures in place for the WC process. The scope of our review specifically focused on the processes related to the following subcategories:

- WC Claims Processing
- Wage Loss (Indemnity) Payments/Payroll Processing
- Medical Payments/Reimbursements
- Time-Off for Treatment
- WC Reviews/Investigations

The objectives of our review included the following:

1. To evaluate the Department's compliance with policies, procedures and applicable laws and regulations for WC.
2. To ensure that WC information is accurate and reliable.
3. To test the design and operating effectiveness of the Department's internal controls over the WC process.
4. To provide recommendations for improvement to enhance effectiveness & efficiency.

OBSERVATIONS:

Based upon our review, we found the DOE's controls related to WC processes are functioning at a "marginal" level. A marginal rating indicates that there may be a potential for loss to the auditable area and ultimately to the DOE. Some improvements are necessary to bring the unit to an acceptable status, and if weaknesses continue without attention, further deterioration of the rating to an unacceptable status may occur.

Please refer to the Risk Ratings section of this report for a complete definition of the ratings used by IA and the Observations and Recommendations section for a detailed description of our findings.

We discussed our preliminary findings and recommendations with management and they were receptive to our findings and agreed to consider our recommendations for implementation.

Each observation presented in this report is followed by specific recommendations that will help to ensure that control gaps are addressed and, if enforced and monitored, will mitigate the control weaknesses. In summary, our observations are as follows:

1. WC procedures are not always followed at the school/office level
2. Inefficiencies and clerical errors in the WC process
3. Lack of effective WC prevention programs

PLANNED FOLLOW UP BY MANAGEMENT AND INTERNAL AUDIT:

IA will follow up with management on their progress of completion for their action plans and report accordingly through the audit committee quarterly updates.

Department of Education
Workers' Compensation Review

Rating Scale Definitions

OVERALL RATING SCALE	
<i>Acceptable</i>	No significant deficiencies exist, while improvement continues to be appropriate; controls are considered adequate and findings are not significant to the overall unit/department.
<i>Marginal</i>	Potential for loss to the auditable unit/department and ultimately to the DOE. Indicates a number of observations, more serious in nature related to the control environment. Some improvement is needed to bring the unit to an acceptable status, but if weaknesses continue without attention, it could lead to further deterioration of the rating to an unacceptable status.
<i>Unacceptable</i>	Significant deficiencies exist which could lead to material financial loss to the auditable unit/department and potentially to the DOE. Corrective action should be a high priority of management and may require significant amounts of time and resources to implement.

OBSERVATION RATING SCALE	
<i>High (1)</i>	<p>1 - The impact of the finding is <i>material</i>¹ and the likelihood of loss is probable in one of the following ways:</p> <ul style="list-style-type: none"> • A material misstatement of the DOE's financial statements could occur; • The DOE's business objectives, processes, financial results or image could be materially impaired; • The DOE may fail to comply with applicable laws, regulations or contractual agreements, which could result in fines, sanctions and/or liabilities that are material to the DOE's financial performance, operations or image. <p><i>Immediate action is recommended to mitigate the DOE's exposure.</i></p>
<i>Moderate (2)</i>	<p>2 - The impact of the finding is <i>significant</i>¹ and the likelihood of loss is possible in one of the following ways:</p> <ul style="list-style-type: none"> ➤ A significant misstatement of the DOE's financial statements could occur; ➤ The DOE's business objectives, processes, financial performance or image could be notably impaired; ➤ The DOE may fail to comply with applicable laws, regulations or contractual agreements, which could result in fines, sanctions and/or liabilities that are significant to the DOE's financial performance, operations or image. <p><i>Corrective action by management should be prioritized and completed in a timely manner to mitigate any risk exposure.</i></p>
<i>Low (3)</i>	<p>3 - The impact of the finding is moderate and the probability of an event resulting in loss is possible.</p> <p><i>Action is recommended to limit further deterioration of controls.</i></p>

¹ The application of these terms are consistent with the guidelines provided by the Institute of Internal Auditors

Department of Education
Workers' Compensation Review

Observations

The detailed observations noted herein were based on work performed by IA through the last date of fieldwork and are generally focused on internal controls and enhancing the effectiveness of processes for future organizational benefit.

Obs. No.	Description	Page #
1	WC procedures are not always followed at the school/office level	7-9
2	Inefficiencies and clerical errors in the WC process	10-14
3	Lack of effective WC prevention programs	15-17

Department of Education
Workers' Compensation Review

Observations

Observation Number: 1

Observation: WC procedures are not always followed at the school/office level **Rating: Moderate**

As stated in the Executive Summary, schools and offices start the WC process once an employee is injured on the job and reports the injury/illness to their supervisor. The schools and offices are responsible for the timely submission of forms to the WC Unit to review before it is sent to DHRD/DLIR. In accordance with Hawaii's Workers' Compensation Law, HRS 386, the DOE must submit an original "WC-1 Employer's Report of Industrial Injury" ("Form WC-1") to DHRD/DLIR within seven (7) working days after the employer has knowledge of such injury causing absence from work for one day or more or requiring medical treatment beyond ordinary first aid, the employer shall make a report thereon to the director.

WC processes are documented on the DOE intranet in the "SASA Academy Documents: Course 4D Human Resources Benefits" and in the OHR Forms section. These documents include when and how to file a WC claim form, what forms are required to be submitted, what tasks need to be completed, the process of filing a claim and the deadlines needed to be met. The WC Unit also provides training to the schools and offices as requested or the SASA and secretaries can take the SASA Academy course on WC processes.

WC Unit also has user manuals that are used to train their personnel on what documents are required, where to send those documents and deadlines needed to be met.

The following are internal control design issues related to the current process:

- **Lack of enforcement for violation of WC policies and procedures**
IA noted that there is no internal DOE consequence to schools/offices that do not submit their WC forms timely. The only known penalty that may be issued to schools/offices is in accordance with Hawaii's Workers' Compensation Law, HRS 386, which states that if Form WC-1 is not received by DHRD/DLIR within seven (7) working days after the required knowledge, then the department could be fined \$5,000, which the DOE has stated would have to be paid by the school/office. There have been no penalties assessed to the DOE as of our audit date.

IA reviewed 55 of the 738 claims that had a *Date of Injury/Illness* during the period July 1, 2013 through December 31, 2014. The following exceptions were noted during testing:

	Exception noted	# of occurrences	% of occurrences
A	<p>"WC-1 Employer's Report of Industrial Injury" was submitted to DHRD/DLIR after the seven (7) working days deadline.</p> <p>(Of those 51 occurrences, 98% were due to the schools/offices submitting the forms late to the DOE WC Unit. The average time span was 47 days from the <i>Date of Injury/Illness Reported</i> to the <i>Date Submitted to DHRD/DLIR.</i>)</p>	51/55	93%

Department of Education Workers' Compensation Review

Observations

- Required WC forms and documents were not always submitted or retained in files**
 IA noted that there are several forms required to be submitted to the DOE WC Unit when filing a claim. The required forms are documented in the training materials as well as on a checklist that outlines what is required, deadlines and routing instructions. If documents are not submitted timely, it delays the WC process and increases workload due to follow-up by DOE WC personnel.

IA reviewed 55 of the 738 claims that had a *Date of Injury/Illness* during the period July 1, 2013 through December 31, 2014. The following exceptions were noted during testing:

	Exception noted	# of occurrences	% of occurrences
A	“Authorization to Receive and Release Medical Information, Records, and Reports/Psychotherapy Notes,” Form DOE-OHR 900-002 (a) or (b), was not on file.	6/55	11%
B	“Notification of Personnel Action,” Form 5, was not on file for individuals that received wage loss payments.	4/55	8%
C	“Record of Absence from Official Duty,” Form 7, was not on file for individuals that received wage loss payments.	9/55	17%
D	Doctor’s Note was not on file.	1/55	2%

Impact

When schools/offices don’t follow WC procedures this may lead to:

- Inefficiencies in the WC process.
- Possible loss of funds by DOE if assessed penalties from DLIR.

Recommendations

Recommendations include:

- Place internal checklist and procedures for file organization in WC files.
- Create internal implications for not submitting WC forms on a timely basis.
- Consider making SASA Academy WC training course mandatory to Administrators and/or SASAs/Secretaries and require them to periodically (e.g. annually) retake course.
- Create and distribute checklists to schools and offices for WC claims processes.

Management Plan

Management’s plan includes:

- Updating the internal procedures for case file organization and will require clerks to add the same to the new WC claim files when opening the new claim.
Anticipated Completion Date: June 1, 2015
- Providing quarterly reports of non-compliance to the Complex Area Superintendents (CASs) to request their assistance with ensuring schools comply with WC policies and procedures.
Anticipated Completion Date: September 30, 2015

Department of Education
Workers' Compensation Review

Observations

- Continue to pursue the recommendation to make the SASA Academy WC training course mandatory with a consequence of providing lists of non-participants to the respective CASs and Assistant Superintendents (ASs) to help ensure compliance.
Anticipated Completion Date: September 30, 2015
- Upon request from schools/offices, providing the SASA Checklist for Workers' Compensation that is included in the SASA Academy training materials, and to include the checklist on the WC Unit's webpage and instructional packet.
Anticipated Completion Date: May 15, 2015

Responsible Manager(s)

Michelle Tsunoda, Acting WC Supervisor, WC Unit, OHR
Jeanetta Ma, Administrator, WC, Health Benefits and Awards Section, OHR

Department of Education
Workers' Compensation Review

Observations

Observation Number: 2

Observation: Inefficiencies and clerical errors in the WC process **Rating: Moderate**

As noted in the Executive Summary above, the WC process is very manual. There is only one Personnel Program Manager (Supervisor), nine Personnel Management Specialists (Claims Managers) and four Personnel Clerks, of which two are temporary in the WC Unit.

Although, the WC Unit has well documented procedures and processes, there are still inefficiencies and errors due to the large number of active cases and new cases coming in every day. The manual process is time consuming and labor intensive, which has resulted in overtime work for Claims Managers in order to keep up with the demand.

The following are internal control design issues related to the current process:

- Claims Managers performing more clerical duties instead of “claim adjuster” duties**
 Claims Managers currently handle approximately 193 active WC cases each, which is more than DHRD who has more staff. (See tables below) Claims Managers are supposed to be continuously assessing the medical information received and talking to their claimant’s physicians to determine if an employee may be able to return to some type of employment. Instead, the Claim Managers are overwhelmed with clerical work to ensure that claimants and service providers can get paid. In addition, claim files are kept as hard-copy documents and not electronically scanned into electronic files. Therefore, much time is spent making copies for claimants and/or their attorneys.

Per discussion with management, many of the other workers’ compensation departments/companies also have in-house specialists such as vocational rehabilitation counselors, occupational nurse consultants and attorneys to assist them in getting employees back to work.

Staffing Comparison Chart:

Department/ Company	# of Upper Management	# of Adjusters	Cases per Adjuster	# of Clerks	# Other Specialists
DOE	1	9 Perm + 2 Temps (Vacant)	193	2 Perm + 2 Temps	0
DHRD	3	7	160	5	2
Private Comp 1*	1	10	150	6	3
Private Comp 2*	2	10	130-150	3	0

*Names redacted to protect confidentiality of private workers’ compensation companies.

Claims and Cost Comparison Chart to DHRD:

Dept.	2011-2012		2012-2013		2013-2014	
	New Claims	Total WC costs	New Claims	Total WC costs	New Claims	Total WC costs
DOE	822	\$10,576,024	690	\$9,294,723	714	\$10,204,014
DHRD	641	\$7,245,029	585	\$10,471,231	560	\$12,616,264

Department of Education Workers' Compensation Review

Observations

- **Delayed processing of notification letters, wage loss payments, and bill payments**

As previously noted in Observation # 1, many of the delays in processing are due to the schools and offices not submitting their WC documents on a timely basis within deadlines. However, IA also noted that there are other delays in certain WC Unit internal processes:

- IA reviewed 55 of the 738 claims that had a *Date of Injury/Illness* during the period July 1, 2013 through December 31, 2014. The following exception was noted during testing:

	Exception noted	# of occurrences	% of occurrences
A	Claimants were not officially notified of the outcome of their claim till over ten (10) business days from when the WC Unit received the case # from DLIR.	14/55	26%

Through discussion with management, though there are no set deadlines to inform claimants about their WC case status, the Claims Managers verbally inform the claimant through a phone call.

- IA reviewed 55 of the 543 claimants that received wage loss payments during the period July 1, 2013 through December 31, 2014. The following exception was noted during testing:

	Exception noted	# of occurrences	% of occurrences
A	Claimant's wage loss payments did not begin until over a month after a case # was received from DLIR.	15/55	28%

Through discussion with management, delays in wage loss payments may be due to missing required WC forms not submitted to the DOE WC Unit, workers not seeking immediate treatment, payroll processing delays, D70 payroll payments (retroactive), or lengthy WC court cases that result in the claimant receiving wage loss payments.

- IA reviewed 55 of the 1,191 claimants that had incurred medical payments/reimbursements during the period July 1, 2013 through December 31, 2014. As documented in the WC Unit's internal procedures, bills must be paid within 60 days of receipt with proper documentation. The following exception was noted during testing:

	Exception noted	# of occurrences	% of occurrences
A	Medical payments were paid over 60 days from the receipt of the bill. (The average time span for bill payments was about 91 days from receipt.)	37/55	68%

Through discussion with management, delays in payments may be due to delays in the auditing of the bills by the Bill Auditor (contracted outside company who reviews WC bills), disputes in amounts of the bills with the service provider and shortage of clerical staff to process the bills.

Department of Education
Workers' Compensation Review

Observations

• **Clerical errors or missing documents in files due to the manual process**

Each WC case is required to have certain documents in the case file, organized by administration, wage loss payments, controverted claims, medical expenses, miscellaneous, and medical reports.

- IA reviewed 55 of the 543 claimants that received wage loss payments during the period July 1, 2013 through December 31, 2014. As noted in the background section, Payroll processes the wage loss payments. Claimants that are employees receive a paycheck and their leave hours are adjusted, while claimants who are no longer employees receive a payment voucher processed through Vendor Payment. Payroll returns a copy of the NECII and a Form 09 to the WC Unit after the payment has been processed. The following exceptions were noted during testing:

	Exception noted	# of occurrences	% of occurrences
A	A Form 09 or payment voucher was not on file for the wage loss payment processed by Payroll or Vendor Payment.	4/55	8%
B	Leave hours indicated on Form 09 did not match the amount of hours entered into the Time & Attendance System.	1/55	2%

- IA reviewed 55 of the 1,191 claimants that had incurred medical payments/reimbursements during the period July 1, 2013 through December 31, 2014. As noted in the background section, for medical payments, an invoice/bill is required and should be reviewed by the Claims Manager. If approved, the "Approval to Pay" stamp should be signed by the Claims Manager prior to being sent to the Bill Auditor. The following exceptions were noted during testing:

	Exception noted	# of occurrences	% of occurrences
A	Medical payment did not have an invoice/bill on file.	2/55	4%
B	Medical payment's invoice/bill was not stamped with the "Approval to Pay" stamp.	21/55	39%
C	Medical payment's invoice/bill was stamped with the "Approval to Pay" stamp, but it was not completed.	2/55	4%

- IA reviewed 10 of the 39 claimants that had returned to work but had taken time off for treatment during the period July 1, 2013 through December 31, 2014. As documented in the WC Unit's internal procedures, the claimants must submit a "Time-Off for Treatment of Industrial Injury," Form DPS-412, prior to taking time off for medical treatment. The following exception was noted during testing:

	Exception noted	# of occurrences	% of occurrences
A	"Time-Off for Treatment of Industrial Injury," Form DPS-412, was not on file for their respective time off taken for treatment.	3/10	30%

Department of Education
Workers' Compensation Review

Observations

Impact
Inefficiencies and clerical errors in the WC process may lead to: <ul style="list-style-type: none">➤ Possible miscalculations of wage loss payments or leave hours used if payroll forms are not reviewed.➤ Loss of funds by the DOE due to longer periods of time that employees are out of work and receiving WC payments.➤ Incomplete WC case files due to missing documents.➤ Possible overpayment/underpayment of invoices/bills due to missing documents and unapproved bills/invoices.➤ Loss of funds by the DOE due to late fees assessed by service providers for unpaid bills.➤ Staff shortages in the schools/office the longer an employee is out on WC.
Recommendations
Recommendations include: <ul style="list-style-type: none">➤ Reassign clerical work from Claims Managers to clerical staff which may require additional resources allocated to this area.➤ Revisit medical payment processes to streamline and reduce the length of time it takes to pay bills to service providers.➤ Place internal checklist and procedures for file organization in WC files.➤ Consider making SASA Academy WC training course mandatory to Administrators and/or SASAs/Secretaries and require them to periodically (e.g. annually) retake course.➤ Remind employees to submit "Time-Off for Treatment of Industrial Injury," Form DPS-412, when they are taking off for treatments related to WC case.
Management Plan
Management's plan includes: <ul style="list-style-type: none">➤ Implementation subject to filling three (3) temporary unbudgeted positions that were just approved for FY16 and FY17. Biennium Budget request for permanent positions has been denied by Legislature. <u>Anticipated Completion Date:</u> September 15, 2015➤ Reviewing business processes which has already been started and will continue. Working with OFS to identify ways to streamline processes to reduce the length of time it takes to pay bills to service providers. <u>Anticipated Completion Date:</u> December 31, 2015➤ Updating the internal procedures for case file organization and will require clerks to add the same to the new WC claim files when opening the new claim. <u>Anticipated Completion Date:</u> June 1, 2015➤ Continue to pursue the recommendation to make the SASA Academy WC training course mandatory with a consequence of providing lists of non-participants to the respective CASs and AS to help ensure compliance. <u>Anticipated Completion Date:</u> September 30, 2015

Department of Education
Workers' Compensation Review

Observations

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| <p>➤ Reminding claimants and SASAs/Secretaries to use the “Time-Off for Treatment of Industrial Injury,” Form DPS-412, when applicable.
<u>Anticipated Completion Date:</u> June 1, 2015</p> |
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<p>Responsible Manager(s)</p>

<p>Michelle Tsunoda, Acting WC Supervisor, WC Unit, OHR Jeanetta Ma, Administrator, WC, Health Benefits and Awards Section, OHR</p>

Department of Education Workers' Compensation Review

Observations

Observation Number: 3	
Observation: Lack of effective WC prevention programs	Rating: Low
<p>In 2011, the DOE created a "Return to Work Priority Program," which is dedicated to providing employees, who are unable to return to their usual and customary duties due to injury or illness, an opportunity for temporary duty or placement to another suitable position. This provision was consistent with the Governor's Administrative Directive No. 94-02, <i>On Returning Injured and Disabled Employees to Work</i>.</p> <p>As previously stated in observation 2, this program will only work if their Claims Managers are provided with more support, including clerical staff to handle a lot of the clerical work they perform. In other Workers' Compensation departments/companies, many of them have in-house specialists such as vocational rehabilitation counselors, occupational nurse consultants and attorneys to assist them in getting employees back to work as well.</p> <p>Per discussion with management, the DOE's "Return to Work Priority Program" has worked to reduce DOE's costs because if the employee chooses not to be in this program then they are terminated.</p> <p>Although the "Return to Work Priority Program" is a great effort to get employees back to work, the DOE does not have an effective proactive program to prevent or reduce the number of employee accidents. Through discussion with management, in-service training to offices and schools on prevention of common injuries and WC statistics was given many years ago, but was stopped. Then, in 2008, a pilot program between Safety, Security and Emergency Preparedness Branch (SSEPB) and WC was started to provide training to Facilities Maintenance Branch crews using WC data. However, that pilot program ended due to a lack of resources in SSEPB. Through discussion with SSEPB, they will still provide training if requested.</p> <p>Currently only schools are required to have a <i>Safety Inspection Team</i> that consists of a Principal or designee, Head Custodian and Complex Administrative Services Assistant (ASA)/Complex Area Business Manager (CABM). The teams are required to complete school inspection reports and document its completion in the committee minutes. In addition, throughout the year, SSEPB performs 14 random follow-up inspections. However, through discussion with management, the teams are not provided with WC data collected but are provided with guidance and checklists. The teams are also supposed to review accident investigations to evaluate prevention efforts.</p>	
Impact	
<p>Lack of effective WC prevention programs may lead to:</p> <ul style="list-style-type: none"> ➤ Increase in employee accidents at the schools/offices. ➤ Loss of funds to the DOE due to increases in the number of WC cases. ➤ Loss of funds by the DOE due to long periods of time that employees are out of work and receiving WC payments. ➤ Staff shortages if employees are out on WC cases. 	

Department of Education
Workers' Compensation Review

Observations

Recommendations

Recommendations include:

- Reassign clerical work from Claims Managers to clerical staff which may require additional resources allocated to this area.
- WC unit to collect and summarize WC data and provide to SSEPB for analysis and training.
- SSEPB to analyze the WC data to identify risk areas/locations/duties that may be potential for injury and address these risks in their training.
- SSEPB to administer accident prevention training as per their functional statement duties.
- School Safety Inspection Teams to review their school's DOE accident reports to evaluate if the school has taken the necessary corrective actions to prevent future accidents from happening.

Management Plan

WC Unit - Management's plan includes:

- Implementation subject to filling three (3) temporary unbudgeted positions that were just approved for FY16 and FY17. Biennium Budget request for permanent positions has been denied by Legislature.

Anticipated Completion Date: September 15, 2015

- Working with OSFSS - SSEPB and provide the regular WC data needed for SSEPB to analyze and provide training to prevent work-related injuries.

Anticipated Completion Date: December 31, 2015

SSEPB - Management's plan includes:

- Reducing WC injuries will take the concerted effort of the entire DOE to accomplish. SSEPB functional statement duties includes "coordinating activities aimed at preventing, managing, and reducing accidents, injuries and losses to students, staff and other users of school facilities." The SSEPB has just implemented a program to conduct a mock Hawaii Occupational Safety and Health Division (HIOSH) inspection of all schools statewide within a three year cycle that is designed to prevent employee injuries through the enforcement of Federal Occupational Safety and Health Administration (OHSA) rules and regulations.
- If WC Section can provide us with monthly electronic reports that collects and summarizes the DOE workers compensation injuries in a useable form with pertinent data to include areas/locations/employee duties/type of injury, etc., we will be able to analyze the data provided to identify risk areas that may be the cause of past and future potential injuries and develop a reporting system to inform CASs and ASs of trends for further follow-up with their schools and offices. We could also develop written training guides for the prevention of common physical injuries that could be disseminated as needed.
- Under the guidance of SSEPB, School Safety Committees can take a more active role to review accident reports and recommend necessary corrective actions to mitigate future accidents from happening.
- Finally, with the current resources in SSEPB, we could develop a limited training program to be offered to the various DOE offices/schools statewide for injury prevention. As we are able to add staff to this effort, we will be able to build and grow the training program function to decrease injuries, thus saving the DOE funds, that will in effect, pay for the positions we will be seeking.

Anticipated Completion Date: January 31, 2016

Department of Education
Workers' Compensation Review

Observations

Responsible Manager(s)
Michelle Tsunoda, Acting WC Supervisor, WC Unit, OHR Jeanetta Ma, Administrator, WC, Health Benefits and Awards Section, OHR Gilbert Chun, Acting Director, SSEPB, OSFSS

Department of Education
Workers' Compensation Review

Acknowledgements

We wish to express our appreciation for the cooperation and assistance afforded to the review team by management and staff during the course of this review.