



Queensland  
Government

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Office of the  
Director-General

Department of  
**Transport and Main Roads**

Mr Michael Crandon MP  
Chairman  
Finance and Administration Committee  
Parliament House  
George Street  
Brisbane Qld 4000

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Dear Mr Crandon

Thank you for your letter inviting the Department of Transport and Main Roads (TMR) to make a further submission to the Finance and Administration Committee's inquiry into the operation of Queensland's workers' compensation scheme.

You advise that the Workers' Compensation Regulatory Authority (Q-COMP) have submitted a proposal aimed at reducing red-tape for employers. Q-COMP propose that amendments be made to the legislation removing the requirement for claims to be lodged with WorkCover Queensland until 50% of Queensland Ordinary Time Earnings (QOTE) is reached with medical expenses or compensation for loss of wages.

TMR appreciates the opportunity to lodge a written submission with regards to Q-COMP's proposal.

Based on an initial assessment of the impact of the changes, it is our view the proposal would in fact increase the administrative and resource burden on TMR. Implementing the proposed changes would require the transfer of a number of functions from WorkCover Queensland to employers, which would require higher levels of competency, additional administrative systems, and increased interaction with medical providers. Specifically, the impact on TMR would include the following:

- TMR would be required to make a determination on the complexity of possible claims and whether or not the injury would meet the legislative requirements necessary to allow compensation. This is a function currently performed by WorkCover Queensland and which requires a higher level of understanding of the legislation than is currently resourced.
- TMR would be required to maintain a register of all claims that were not forwarded to WorkCover Queensland, requiring the development of additional administrative systems to be implemented under strict data confidentiality requirements. The reporting and analysis of this data would also require additional resource. These are both functions currently performed by WorkCover Queensland.

- Medical providers, such as doctors and health specialists, would need to forward their invoices directly to TMR for payment, instead of to WorkCover Queensland. Aside from the initial education that would be required, the processing of additional invoices each year would impact on TMR's financial resources.
- The development and implementation of internal systems required to manage incoming accounts to ensure that, once the threshold was exceeded, the claim was forwarded to WorkCover Queensland, would have an administrative and systems impact. This would be an entirely new process for employers.
- The shift in responsibility for determining claims below the threshold from WorkCover Queensland to TMR also has the potential to negatively impact on the relationship between TMR and the injured worker. The role of WorkCover Queensland as an independent arbiter of claim decisions, allows TMR to focus solely on the wellbeing of the injured worker.

The system in place currently works efficiently for TMR. As a result of the implementation of the fax fee initiative by WorkCover Queensland the majority of TMR's claims are lodged directly with the insurer by the treating doctor. In these cases the only requirement expected of TMR as the employer is to confirm they are aware of the event and to comment on whether they are satisfied with the claim being accepted or believe further investigations should be undertaken by WorkCover Queensland.

If you require further information, please call Mr Matthew Richards, Senior Advisor  
[REDACTED] Mr Richards will be pleased to assist.

Yours sincerely



Neil Scales  
**Director-General**  
**Department of Transport and Main Roads**