



N.S.W. Workers' Compensation  
Self Insurers Association Inc.

Employers Managing Their Own Risk  
ABN 69 780 464 009

26 February 2020

## **Submission from Self Insurers Association on SIRA's Discussion paper – measuring return to work (RTW)**

Thank you for the opportunity of providing a submission regarding measuring return to work (RTW).

The SIA has read the discussion paper and provides a response to focus questions listed in discussion paper.

1. SIRA's primary RTW measure uses the work status code. Do you have any other suggestions on this specific measure and/or other alternative RTW measures? For example, only use those claimants with a substantial injury such as 10 days off work, take a 12-month average RTW rate or a rolling month average RTW Rate

**SIA Response:** SIA believes that using WSC to measure RTW is flawed as well as the current methodology. Lost time could be captured via medical certification and claim exclusions should include:

- Liability declined from onset
  - Provisional liability where declined after provisional and before acceptance.
  - L.T.I where less than 14 days off.
  - Claims where return to suitable duties within 7 days.
2. The primary RTW (work status) measure can be applied to various cohorts, for example, people with different injury types, people partially returning to work, different occupational groups. Are there any other cohort mixes where the RTW measure could be applied?

**SIA Response:** RTW in suitable duties should exclude Psychological injuries and reporting by industry groups.

3. Should people be back at work for a specified time before being considered a sustainable RTW? What period would you consider sustainable?

**SIA Response:** Yes, and two weeks is recommendation

4. Should SIRA use lead indicators for return to work such as early intervention, reduced or no disputes, positive communication and engagement by employer in RTW process?

**SIA Response:** No, SIA does not believe lead indicators should be used

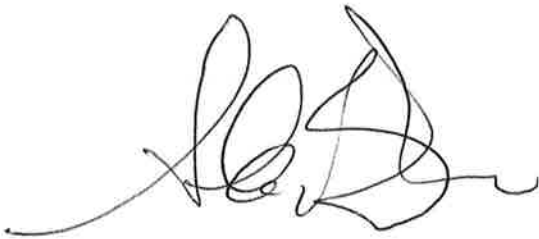
5. What measures should be used for measuring RTW in CTP scheme for injured people where the employer does not have the obligations that apply under workers compensation? Are there additional considerations for measuring RTW in the CTP scheme?

**SIA Response:** Not Applicable

6. Is there anything else SIRA should consider in its measurement of RTW?

**SIA Response:** Please see previously discussed exclusions and publication of RTW data / performance should be de-identified. The measure must be applied uniformly across the entire system.

Regards

A handwritten signature in black ink, appearing to read 'Alan Becken', with a long horizontal flourish extending to the left.

Alan Becken  
Chairperson  
NSW Self Insured Association