

March 10, 2006

John Shilts, Director  
Department of Consumer and Business Services  
Workers' Compensation Division  
PO Box 14480  
Salem, OR 97309-0405

Dear Mr. Shilts:

I reviewed the recent WCD bulletin on Independent Medical Exams and was dismayed to note that it states, "The IME doctor will send a copy of the report to the insurer within seven days" (of the IME exam).

I cannot imagine that this policy stems from any well informed review of the IME process. It fails to take into account the fact that many IME exams are on claimants whose injuries date back three to ten years, often longer. Many claimants have extremely complicated medical histories with extensive medical records, often several inches thick.

As an IME doctor, I pride myself in treating these cases with the same care and attention to detail that I provide the patients in my own office. It often takes hours to review the records, in addition to the hour allotted for the exam. Often, the records are incomplete, and, as I am accustomed to doing in my own office, I will then attempt to obtain the pertinent missing records, a process which often takes more than one week.

Additionally, there may be the necessity of ordering additional radiological studies or scheduling NCV testing in order to answer the questions posed. Thus, it often takes more than a week to gather all of the relevant clinical data and then additional time to prepare an informative and accurate report.

By arbitrarily establishing a deadline of seven days, it seems to me that you will only succeed in compromising the quality, validity, and usefulness of the IME report. I would hope that the WCD could review this matter and allow for some input from the examining physicians as soon as possible.

Sincerely,



Lynne Adams Bell, M.D., Ph.D.  
Neurologist

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**EXHIBIT**

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