



Independent Medical Examination Association

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www.IMEAssociation.com

November 1, 2005

Board of Directors

Corvel
(971) 204-2010

Mr. Fred Bruyns
Administrative Rulemaking Coordinator
Department of Consumer and Business Services, WCD

*Impartial Medical
Opinions*
(503) 635-1604

350 Winter Street NE, Room 27
Salem, OR 97301

RE: Proposed Rulemaking re: Divisions 55, 60 & 10

*Medical Assurance
Group*
(877) 295-6109

Dear Mr. Bruyns:

*Medical Consultants
Network, Inc.*
(503) 245-9810

Please accept the following comments on behalf of the Independent Medical Examination Association regarding your proposed administrative rules numbered OAR 436-055, OAR 436-060, and OAR 436-010.

*Oregon Medical
Evaluations*
(503) 684-3988

**OAR 436-055
Certification of Claims Examiners**

*Orthopaedic
Consultants*
(503) 228-4035

**PROPOSED OAR 436-055-0085
TRAINING FOR INTERACTIONS WITH INDEPENDENT MEDICAL EXAMINATION
PROVIDERS**

STAR MEDICAL
(503) 620-6625

IMEA Testimony: OAR 436-055-0085 (1)

*Sunrise Medical
Consultants*
(866) 931-9911

Suggest: *deletion* of *subsection (1)* and **insertion** of the following language “**The Director must first approve any training provided pursuant to OAR 436-005-007(1) or OAR 436-005-0100(4) relating to interactions with independent medical examination providers.**”

*WMC1 Prime
Evaluations*
(503) 796-0012

IMEA Testimony: OAR 436-055-0085 (2)(a)

**Associate Board Member
Representative**

Suggest: *deletion* of the word “*and ethical communication*” and **insertion** of the words “**interactions with independent medical examination providers**”.

*Public Risk
Consultants*
(503) 620-6207

Rationale: As the Oregon Medical Association has repeatedly noted, ethical issues fall within the purview of the licensing boards. In addition, MLAC explicitly rejected language that included “ethical” oversight. There is no enabling legislation that expands