

**Miller, Diane M. (CDC/NIOSH/EID)**

---

**From:** James Melius [melius@nysliuna.org]  
**Sent:** Thursday, August 26, 2010 4:21 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Katz, Ted (CDC/NIOSH/OD); Wade, Lewis (CDC/NIOSH/OD) (CTR)  
**Subject:** 194 - Ten-Year Review of the NIOSH Radiation Dose Reconstruction Program  
**Attachments:** Comments on Phase I.doc; Comments on Phase I.doc

I have attached my review of two of the Ten-Year Review Documents as made available at the August meeting of the ABRWH.

Jim Melius, Chair, ABRWH

## Comments on Phase I – Timeliness

### Time to Complete Initial Claim

Isn't the average time for completing a claim for the "calendar year submitted" a better measure of progress in the program than basing it on calendar year received. The latter does not include claims that are still incomplete and thus is skewed to a shorter time period. Average time for calendar year submitted shows little progress in reducing the time. Admittedly, that statistic includes older claims (e.g., for 2009, it includes some claims from 2001). Perhaps, looking at another statistic such as the median time might also be helpful.

### Overestimates –

I was surprised by the length of time for completing overestimate claims. It appears to parallel the time required for the underestimate claims. This needs to be evaluated.

### Backlog

The backlog data should be more detailed. Of the 242 active claims at NIOSH for more than 12 months, what is their distribution by year (how many have been waiting 3 years or more, etc.). Of the backlog of old claims cleared in the last year (4049 claims), how were they addressed? How many became 83-14's, etc. This information should be helpful to prevent future backlogs.

## Comments on Phase I – Timeliness

### Time to Complete Initial Claim

Isn't the average time for completing a claim for the "calendar year submitted" a better measure of progress in the program than basing it on calendar year received. The latter does not include claims that are still incomplete and thus is skewed to a shorter time period. Average time for calendar year submitted shows little progress in reducing the time. Admittedly, that statistic includes older claims (e.g., for 2009, it includes some claims from 2001). Perhaps, looking at another statistic such as the median time might also be helpful.

### Overestimates –

I was surprised by the length of time for completing overestimate claims. It appears to parallel the time required for the underestimate claims. This needs to be evaluated.

### Backlog

The backlog data should be more detailed. Of the 242 active claims at NIOSH for more than 12 months, what is their distribution by year (how many have been waiting 3 years or more, etc.). Of the backlog of old claims cleared in the last year (4049 claims), how were they addressed? How many became 83-14's, etc. This information should be helpful to prevent future backlogs.