

Summary of Best Practices: Steps to a Non-Conclusory Causation Explanation

1. Define the injury or conditions in question.
 - Don't assume the reader has any medical knowledge and give a thorough explanation.
 - Just listing the diagnosis or codes is not sufficient. Explain what it means.
2. Is the injury, condition, or diagnosis that is at issue present or absent in this employee?
 - Explain what objective findings lead you to believe the employee does or does not have the injury.
3. **Explain what happened.**
 - What was the mechanism of injury that caused the injury or condition in question?
 - Explain the accident/incident and why these forces, if applicable, could result in the claimed injury, condition, or an aggravation of a preexisting injury or condition.
4. What was the state of the employee at the time of the accident/incident, and how might this affect your analysis?
 - Preexisting conditions, prior surgeries, comorbidities, symptom onset
5. Was the accident/incident a substantial factor in causing the injury/illness in question, and without the accident/incident, the injury/illness would not have occurred?
 - Examples of “substantial factor”:
 1. Falling off a curb is a substantial factor in causing a broken ankle.
 2. Falling off a curb is not a substantial factor in causing co-morbidities such as diabetes or hypertension.
6. Be sure to use evidence-based medicine and to cite to evidence based medicine, when appropriate.
 - “Evidence-based medicine” means the use of current best quality scientific and medical evidence formulated from credible scientific studies, including peer-reviewed medical literature and other current scientifically based texts, and treatment and practice guidelines in making decisions about the care of individual patients.
7. What supports your conclusion that the injury/illness was/was not the result of this accident/incident?
 - The statement should also explain how, without the accident/incident, the injury/illness in question would not have occurred.