

General Functional Capacity Issues:

Q: did you take any classes in medical school on deterring patient's functional capacity?

A: none

Q: What skills have you acquired or specialized education received that give you expertise in determining someone's RFC ?

A: none

Q: What methods do you have to verify or confirm the accuracy of your prediction here today?

A: I don't know?

Q: What is the error rate of your predictions of someone RFC?

A: I don't know

Q: Do you ever use the AMA Guides to the Evaluation of Permanent Impairment?

A: I am familiar with them

Q: Are the Guides accurate in assessing RFC?

A: No; they are an estimate as well

Q: When is last time that you offered an opinion of someone's RFC prior to today's hearing?

A: other hearings for SSA I was doing SS hearing before you were toilet trained

Q: how many SSA hearings have you testified as to some one RFC?

A: Hundreds

Q: Did you ever followed up with those claimants to ascertain whether your opinions were validated?

A: no

Q: Do you have any data on the accuracy of your perditions for functional capacity of individuals based on the review of medical records?

A: no

Q: Do you know of any published articles support the accuracy of RFC assessment based solely on record reviews?

A:no

Q: Are there any relevant medical studies on this issue of functional capacity, with regard to the specific diagnoses or conditions of this individual?

A: I do not know.

Q: Can you summarize the medical literature on accuracy of prediction of functional ability for the claimant's particular medical conditions?

A: no

Q: Are there any factors that may limit the ability of this individual to sustain your estimated level of function, day after day 40 hours a week, 160 hours a month 1800 hours a year. Year after year after year?

A: I don't know

Q: Dr. isn't fair to say that you have no knowledge, no skill, no experience, no training or and no education on offering accurate Functional capacity evaluations?

Q: Dr. assumes a hypothetical individual of the same medical condition as evidenced my medical record and the testimony of the claimant. To what level of medical scientific certainty can you offer an opinion as to what this person can perform in a work setting over the course of a year. 20 percent accuracy 30 percent accuracy 40 percent accuracy?

Dr. one last thing what percentage of your income is from doing SSA hearings?