DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY

WORKERS' DISABILITY COMPENSATION AGENCY

WORKERS' COMPENSATION BOARD OF MAGISTRATES

Filed with the secretary of state on November 12, 2021

These rules take effect immediately upon filing with the secretary of state unless adopted under section 33, 44, or 45a(9) of the administrative procedures' act of 1969, 1969 PA 306, MCL 24.233, 24.244, or 24.245a. Rules adopted under these sections become effective 7 days after filing with the secretary of state.

(By authority conferred on the director of the workers' disability compensation agency by sections 205 and 213 of the worker's disability compensation act of 1969, 1969 PA 317, MCL 418.205 and 418.213, section 33 of the administrative procedures act of 1969, 1969 PA 306, MCL 24.233, and Executive Reorganization Order Nos. 1996-2, 1999-3, 2002-1, 2003-1, and 2019-3, MCL 445.2001, 418.3, 445.2004, 445.2011, and 125.1998)

R 418.81, R 418.82, R 418.83, R 418.84, R 418.85, R 418.86, R 418.87, R 418.88, R 418.89, R 418.90, R 418.91, R 418.92, R 418.93, R 418.94 R 418.95 R 418.96, R 418.97, R418.98, 418.99 of the Michigan Administrative Code are added, as follows:

PART 1. GENERAL

R 418.81 Definitions.

Rule 1. As used in these rules:

(a) "Act" means the worker's disability compensation act of 1969, 1969 PA 317, MCL 418.101 to 418.941.

(b) "Board" means the workers' compensation board of magistrates.

(c) "JFPTC" means joint and final pretrial conference.

(d) "JFPTO" means joint and final pretrial order.

R 418.82 Scope.

Rule 2. (1) These rules apply to practice and procedures before the board.

(2) These procedural rules must be construed to secure a fair and impartial determination of the issues presented in contested cases consistent with due process.

R 418.83 Hearing district explained.

Rule 3. (1) A hearing district is an area of the state served by 1 or more magistrates as designated by the chairperson of the board.

(2) The assignment of magistrates is as required by caseload and determined by the chairperson of the board.

(3) The chairperson of the board is responsible for implementing hearing procedures and has general supervisory control of the board, consistent with section 213 of the act, MCL 418.213, and Executive Reorganization Order No. 2019-13, MCL 125.1998.

R 418.84 Computation of time.

Rule 4. (1) In computing any period of time prescribed or allowed by these rules, the time in which an act is to be done is computed by excluding the first day and including the last, unless the last day is a Saturday, Sunday, or state legal holiday, in which case the period will run until the end of the next day following the Saturday, Sunday or state legal holiday.

(2) Unless otherwise specified by the magistrate, rule, or statute, the date of receipt of a filing by the board is the date used to determine whether a pleading or other paper has been timely filed.

(3) Except where otherwise specified, a period of time in these rules means calendar days, not just business days.

R 418.85 Appearances.

Rule 5. (1) Unless otherwise indicated by the magistrate, the parties or their attorneys shall personally appear at facilitations, motions, pre-trials, redemptions, hearings on the merits, control dates, JFPTC, and any other types of hearings as may be scheduled.

(2) With prior approval of the magistrate, the parties or their attorneys may appear by telephone, video conference, or other electronic means. The parties or their attorneys shall be ready to proceed as previously directed by the magistrate.

(3) Failure of the petitioner or the petitioner's attorney to appear in a timely manner and participate may subject the application for hearing to dismissal. If the respondent or the respondent's attorney fails to appear in a timely manner, then the magistrate may proceed in the absence of the respondent or the respondent's attorney.

R 418.86 Disqualification of magistrate.

Rule 6. (1) A party may bring a motion to disqualify a magistrate, or a magistrate may raise the issue on his or her own initiative.

(2) A magistrate is disqualified when the magistrate cannot impartially hear a case. Circumstances that warrant disqualification include, but are not limited to, circumstances where the magistrate:

(a) Is interested as a party.

(b) Is personally biased or prejudiced for or against a party or attorney.

(c) Has been consulted or employed as counsel.

(d) Was a partner of a party, attorney for a party, or a member of a law firm representing a party within the preceding 2 years.

(e) Is within the third degree under civil law of consanguinity or affinity to a person acting as an attorney or within the sixth degree under civil law to a party.

(f) Owns, or his or her spouse or minor child owns, a stock, bond, security, or other legal or equitable interest of a corporation that is a party. This subdivision does not apply to any of the following:

(i) Investments in securities traded on a securities exchange registered as a national securities exchange under the Securities Exchange Act of 1934, 15 USC 78a to 78pp.

(ii) Shares of an investment company registered under the Investment Company Act of 1940, 15 USC 80a-1to 80a-64.

(iii) Securities of a public utility holding company registered under the Public Utility Holding Company Act of 2005, 42 USC 16451(8).

(g) Is disqualified for any other reason by law.

(3) A party shall file a motion to disqualify within 30 days after the case has been assigned to a magistrate, or within 30 days after the movant discovers, or with reasonable diligence should have discovered, the information that is the basis of the motion, whichever is later.

(4) The motion for disqualification must set forth with particularity the factors that would be admissible as evidence to establish the grounds stated in the motion. An affidavit must accompany the motion.

(5) The challenged magistrate shall decide the motion. If the challenged magistrate denies the motion, then the challenging party may ask that the motion be referred for decision to the chairperson or, in the chairperson's discretion, the chairperson may assign the motion to another magistrate at a different hearing location for decision, except as provided in subrule (6) of this rule.

(6) If the motion is made after the trial has commenced, then the challenged magistrate shall rule upon the motion. If the motion is denied, then the trial magistrate shall continue the trial.

(7) When a magistrate is disqualified, the chairperson shall assign another magistrate to hear the case.

(8) The parties may waive actual, potential, or purported conflicts with a magistrate, and that magistrate may then process the claim as he or she deems fit.

R 418.87 Ex parte communications with a magistrate.

Rule 7. (1) Counsel or the parties may not engage in substantive ex parte communications with the magistrate concerning the action prior to the hearing. Routine communication about administrative tasks, such as scheduling hearings, is not prohibited.

(2) If a magistrate receives direct or indirect communication prohibited by subrule (1) of this rule, the magistrate shall promptly notify all parties or their attorneys of the receipt of such communication and its content. A record of the communication must be maintained in the agency file.

(3) Once a case has been referred to a magistrate for hearing, all communication related to the case of a substantive basis from any party should be administered through agency staff.

R 418.88 Case development docket.

Rule 8. (1) All cases are assigned to a magistrate on initial pre-trial date. Unless it is a 60-day case, the magistrate shall place the case on the case development docket and schedule an initial control date. 60-day cases, as provided in section 205 of the act, MCL 418.205, must be placed on the trial docket, and scheduled for a JFPTC and trial date in accordance with R 418.93. The petitioner in a 60-day case may waive that status and the case shall then be placed on the case development docket.

(2) Cases that are on the case development docket are assigned control dates at the discretion of the magistrate at such intervals and frequency as deemed appropriate. Appearance of the parties must comply with R 418.85.

R 418.89 Subpoena; provision to opposing party; submittal of subpoenaed records; disputes.

Rule 9. (1) A subpoena must be on an agency approved form and comply with the following:

(a) The party requesting the subpoena shall certify that the matter about which the subpoena is requested is pending before the agency.

(b) Magistrates or attorneys may sign subpoenas. A subpoena must be fully completed before submission to a magistrate for signing.

(c) The return date indicated on the subpoena must provide a reasonable time for compliance.

(d) Magistrates may sign a subpoena for a case assigned to another magistrate unless the assigned magistrate has refused to sign the subpoena.

(2) A copy of a subpoena issued by a magistrate or attorney pursuant to section 853 of the act, MCL 418.853, must be provided to all parties, or their legal counsel if known, at the time of issuance.

(3) All subpoenaed records must be returned directly to the party requesting the records. The charges for copying records are limited to the charges permitted by R. 418.10118(1).

(4) The recipient of the subpoena shall immediately do either of the following:

(a) Provide a complete copy of the records to the requesting party.

(b) Make the records reasonably available to the requesting party for copying.

(5) After a requesting party has obtained a copy of subpoenaed records, that party shall promptly provide a copy to all other parties.

(6) Only those records admitted into evidence or offered and excluded by a magistrate at a hearing are placed in the agency file or maintained by the agency.

(7) Any dispute arising under this rule must be brought by motion before the assigned magistrate and have a copy of the subpoena attached. A copy of the motion and the subpoena must be served on all parties or their counsel, and proof of service filed with the agency. If a party claims certain subpoenaed records, or portions thereof, are protected from disclosure by a privilege, the magistrate assigned to the case shall assign another magistrate to hear the motion, review the records, and order production of the records, or portions thereof, not specifically protected by a privilege.

(8) A witness who attends any action or proceeding pending before a magistrate shall be paid a witness fee of $12.00 for each day and $6.00 for each half day. The traveling expenses are those authorized in the state standardized travel regulations.

R 418.90 Motion practice.

Rule 10. (1) All requests for action addressed to the magistrate, other than during a hearing, must be made in writing. Written requests for action must state specific grounds and describe the action or order sought. A copy of all written motions or requests for action must be served pursuant to R 408.36(c). All motions must be accompanied by a notice of hearing.

(2) All motions must be filed at least 14 days prior to the date set for hearing unless other scheduling provisions prevent compliance with this timeline or the need for the motion could not reasonably have been foreseen 14 days prior to the hearing.

(3) A response to a motion may be filed within 7 days after service of the written motion unless otherwise ordered by the magistrate. A party may request an expedited ruling.

(4) All motions and responses must include citations of supporting authority and, if germane, supporting affidavits and attachments to affidavits.

(5) A ruling on a motion must be on the record and memorialized in a written order, at the discretion of the magistrate or if requested by any party.

(6) Unless ordered by the magistrate or a tribunal of higher authority, a claim for review filed in response to a ruling issued under subrule (5) of this rule is not a stay of magistrate proceedings.

R 418.91 Discovery.

Rule 11. (1) Discovery provided in sections 222, 301, 401, and 853 of the act, MCL 418.222, 418.301, 418.401, and 418.853, and applicable caselaw, must be available under the supervision of the magistrate as set forth in this rule.

(a) The claimant shall provide the information and records required pursuant to section 222(3) of the act, MCL 418.222, a completed WC-105A, and copies of reports from medical examiners requested by the employer or his or her attorney within 30 days of receipt.

(b) The employer or carrier shall provide information and records required pursuant to sections 385 and 222(2) of the act, MCL 418.385 and 418.222, and a completed WC-105B, except where the employer is no longer active and there is no representative available to complete the form.

(c) The parties shall reasonably supplement their responses to subdivisions (a) and (b) of this subrule as new information is obtained or records are received.

(d) Vocational consultant reports and the information contained therein must be provided to all parties within 21 days of receipt of the reports. Failure to observe the time periods in this subdivision may be raised by any party as a basis to exclude the report as evidence at the discretion of the magistrate. Any information in the report regarding available remunerative employment must include all of the following:

(i) The name, address, and phone number of the employer with available employment.

(ii) A job description outlining all of the functional requirements of the job.

(iii) Any other pertinent information necessary to apply for the employment.

(e) If an employer or carrier independently obtains information that remunerative employment is reasonably available to the injured employee, the employer or carrier shall, within a reasonable time, provide to the employee or his or her attorney all the information required in subdivision (d)(i), (ii), and (iii) of this subrule.

(f) If not already provided by the employer pursuant to subdivision (b) of this rule, employers, carriers, and claims administrators shall, upon written request, provide a complete copy of all employment, personnel and claims records of the employee in their possession, including, but not limited to, electronically stored, or communicated information. Records must include, but are not limited to, all of the following:

(i) Payroll records.

(ii) Records and values of all fringe or other benefits.

(iii) Injury reports.

(iv) Witness statements.

(v) First aid and other medical reports.

(vi) Group insurance records.

(vii) Material safety data sheets.

(viii) Air quality studies.

(ix) Occupational safety and health reports.

(x) Nurse case management records.

(xi) Non-privileged portions of the claims file.

(g) Upon request, an employee shall submit to an examination by a physician or surgeon authorized to practice medicine in this state. The term 'physician' as used in this rule shall be interpreted to include psychologists who satisfy the requirements of section 18223 of the public health code, 1978 PA 368, MCL 333.18223, and section 1100c(11) of the mental health code, 1974 PA 258, MCL 330.1100c. The magistrate may determine the time, place, manner, conditions, and scope of the examination. Other than as provided for in section 385 of the act, MCL 418.385, no person other than the employee may be present at the examination without the consent of the opposing party or by order of the magistrate for good cause shown.

(h) Upon the request of a defendant employer or carrier, an employee seeking wage loss benefits shall appear for an interview regarding his or her qualifications and training conducted by a qualified vocational rehabilitation consultant at a time and place convenient to the employee. The employee may appear with a person of the employee's choosing. The employee may record the interview at the employee's expense with the consent of the opposing party or by order of the magistrate for good cause shown.

(i) Additional discovery under section 853 of the act, MCL 418.853, may be made equally available to all parties at the discretion and supervision of the magistrate.

(j) For claims arising out of an employee's death, the employer or carrier shall, upon written request, provide the following to the claimant's attorney within 28 days:

(i) The names, addresses, and telephone numbers of all individuals with information about the employee's jobs duties and the events and circumstances surrounding the employee's injury or death.

(ii) Copies of all investigation or incident reports and witness statements in the employer's possession or control.

(iii) Copies of all electronically stored information, including video surveillance, that documents the employee's injury or death and the circumstances surrounding it.

(iv) Depending on the nature of the case and the issues involved, the magistrate may order other forms of discovery, upon request of a party and for good cause shown.

(v) The obligations set forth in subdivision (j)(i) and (ii) of this subrule apply equally to information possessed by claimants, their attorneys, and agents thereof.

(k) For claims arising out of an employee's cognitive or communicative incapacity, a magistrate may require the employer or carrier to provide the information set forth in subdivision (j) of this subrule upon a sufficient showing of such cognitive or communicative incapacity.

(l) Evidence exchanged pursuant to this rule shall not be provided to or maintained by the agency unless marked as an exhibit by a party.

(2) Upon finding the willful failure of a party to comply with this rule, the magistrate may exclude evidence or prohibit that party from proceeding under the act.

R 418.92 Exhibit admissibility hearing.

Rule 12. (1) After the parties have had a reasonable opportunity to gather and exchange existing medical and other documents upon stipulation of the parties, upon the motion of a party, or at the discretion of the magistrate, the magistrate may schedule, at a date, time,

and place convenient to the parties, a hearing to determine admissibility at trial of any specific proposed exhibit.

(2) A party seeking to introduce any specific proposed exhibit under this rule shall provide a copy of such exhibit, unless previously furnished to all other parties, at least 14 days prior to the exhibit admissibility hearing.

(3) Any objections to the proposed exhibit must be made by the parties at or before the hearing and ruled upon by the magistrate consistent with R 418.97. Upon finding that a proposed exhibit under this rule is not authentic or was created specifically for purposes of the litigation, the magistrate may exclude the proposed exhibit. Any decision on any objections are subject to R 418.90(5) and (6).

(4) All exhibits found admissible by the magistrate must be identified with specificity in an order and admitted at the time of trial.

(5) A party may attempt to cure or remedy any sustained objections to the admission of exhibit raised by an opposing party at the exhibit admissibility hearing. This rule does not preclude a magistrate from subsequently admitting the proposed documents once the parties have had the opportunity to cure or remedy any objections raised. This rule does not preclude a party from offering other documentary evidence prior to the JFPTC or during trial.

(6) If an exhibit is found to be admissible, any party opposing admission of the exhibit may schedule the deposition of the person or entity that prepared the record at that party's expense. The magistrate may limit the physician charges for such cross examination to a reasonable fee under section 858 of the act, MCL 418.858. The party offering the evidence is entitled to examine the person or entity during such a deposition.

R 418.93 Joint final pre-trial conference.

Rule 13. (1) Records or other exhibits of any kind that any party intends to offer as evidence in the proceeding shall be exchanged between the parties no later than 14 days before the JFPTC. After the parties have gathered and exchanged the existing medical and other evidence, upon stipulation of the parties or at the discretion of the magistrate, there must be a JFPTC with the magistrate regarding admissibility of evidence or any other preliminary matters.

(2) The parties may prepare and file a joint final pre-trial statement that lists issues for adjudication, stipulations, and any potential witnesses and exhibits, other than materials subject to attorney-client privilege, that the parties intend to submit into evidence at the time of trial. This will not constitute a waiver of any issue, witness testimony, or exhibit not specifically raised or listed should a statement be submitted.

(3) Any objections to the proposed witnesses and exhibits shall be made by the parties and ruled upon by the magistrate. Upon finding that a proposed exhibit under this rule is not authentic or was created specifically for purposes of the litigation, the magistrate may exclude the proposed exhibit. Any decision on any objections is subject to R 418.90(5) and (6).

(4) All admissible exhibits must be listed in a JFPTO, except as provided in subrules (2) or (7) of this rule or R 418.94(6), and admitted at the time of trial.

(5) After the completion of the JFPTC, the magistrate shall place the case on the trial docket and assign a trial date. The magistrate may schedule a subsequent JFPTC if necessary.

(6) The parties are bound by the stipulations listed on the JFPTO unless modified or withdrawn for good cause shown. If a stipulation is modified or withdrawn, the party proposing the stipulation may offer additional evidence, including testimony necessitated by the withdrawal or modification.

(7) The parties must be entitled to necessary rebuttal evidence and witnesses including materials subject to attorney client privilege, not listed on the JFPTO at the time of trial. The parties may offer rebuttal evidence and witnesses at the time of trial, not listed on the JFPTO, including materials not previously disclosed due to attorney-client privilege.

(8) While a case is pending on the trial docket, the parties may attempt to cure or remedy any objections raised by the opposing party at the JFPTC. The magistrate may make subsequent rulings as to admissibility once the parties have had the opportunity to cure or remedy any objections raised.

(9) At the discretion of the magistrate, a case may be returned to the case development docket after being placed on the trial docket if the circumstances require, to allow further development.

PART 2. HEARINGS

R 418.94 Hearing procedures.

Rule 14. (1) The party filing the application for mediation or hearing must first present evidence in support of the application.

(2) Unless the magistrate orders otherwise, only 1 attorney for each party may examine or cross-examine a witness.

(3) The magistrate may call witnesses, issue subpoenas, and order the production of books, records, accounts, and papers that are necessary for the purpose of making a decision. A magistrate may direct the attorneys to submit briefs.

(4) The magistrate may require such information from the parties as may be necessary to monitor the progress of the case, assist in the voluntary exchange of information between parties, and assist in the scheduling of cases.

(5) The hearing completion time shall be at the discretion of the magistrate, but it must not be more than 30 days after the date the hearing commenced unless the magistrate allows an extension beyond this time for good cause shown.

(6) Unless provided in accord with R 418.92 and R 418.93, all records, or other exhibits of any kind that any party intends to offer as evidence in the proceeding must be exchanged between the parties no later than 14 days before the JFPTC. This will not preclude admission at trial of any additional records or exhibits and does not constitute preclusion of records or exhibits not in the possession of either party, or newly discovered relevant evidence from being admitted.

(7) At their own expense, a party may schedule the cross-examination of the person or entity that prepared a proposed exhibit. The magistrate may limit the physician’s charges for such cross-examination to a reasonable fee under section 858 of the act, MCL 418.858.

(8) This rule does not affect the magistrate’s discretion to rule on newly discovered evidence.

(9) A case may be placed on the redemption docket upon request of the parties if it appears that the case will be resolved by way of redemption. The parties must be given necessary time to resolve any issues regarding medical bills or liens; Medicare or Medicaid compliance;

friend of the court liens; or any other such liens, claims, or issues that may arise. If the parties are ultimately unable to resolve the case by way of redemption, the case must be returned to the development or trial docket, at the discretion of the magistrate.

(10) Upon finding the willful failure of a party to comply with this rule, the magistrate may prohibit that party from proceeding under the act.

R 418.95 Stipulations.

Rule 15. In addition to stipulations in the JFPTO:

(1) The parties may agree upon facts, or any portion of facts, by written stipulation or by a statement entered into the record.

(2) Stipulations must be used as evidence at the hearing or subsequent proceedings.

(3) Stipulations are binding on the parties that have acknowledged acceptance of the stipulations.

(4) The parties may stipulate to limit the issues to be decided by the magistrate. The stipulation only applies to that issue and is not considered a waiver of any rights not addressed by the stipulation.

R 418.96 Record.

Rule 16. (1) The agency shall maintain an official record of each case or proceeding.

(2) The record must include all of the following:

(a) Notice of hearings and records of adjournments.

(b) JFPTO and any other prehearing orders.

(c) Motions, pleadings, briefs, applications, requests, opinions, and orders.

(d) Evidence admitted.

(e) Statements of matters officially noticed.

(f) Offers of proof, objections, and rulings.

(g) Clearly marked offered but rejected evidence.

(h) Recordings and transcripts of the proceedings before the magistrate that have been obtained by the parties.

(i) Written notations of any ex parte communications.

R 418.97 Evidence admissibility; objections, submission in written form.

Rule 17. (1) Except as provided in these rules, the Michigan rules of evidence, as applied in a civil case in circuit court, must be followed in all proceedings as far as practicable, but a magistrate may admit and give probative effect to evidence of a type commonly relied upon by reasonably prudent persons in the conduct of their affairs.

(2) The following governs admissibility of medical records at trial:

(a) Absent an objection sustained by the magistrate, authenticated treating medical records, including bills, must be admitted.

(b) A report of an independent medical examiner under section 385 of the act, MCL 418.385, shall be admitted into evidence if offered by the injured employee. A report by an independent medical examiner requested by the injured employee must be admitted into evidence if offered by defendant.

(c) Properly authenticated diagnostic reports must be admitted into evidence if prepared by treating medical providers and commonly relied upon by other treating physicians

including, but not limited to, x-rays, MRI reports, CT scans, EMG's, nerve conduction studies, ultrasounds, and laboratory results.

(3) Expert testimony may be admitted without satisfying *Daubert v Merrell Dow Pharmaceuticals, Inc*, 509 US 579, 589; 113 S Ct 2786; 125 L Ed 2d 469 (1993).

(4) Effect is given to the rules of privilege recognized by law.

(5) A duly executed certificate on the agency subpoena form satisfies the authentication requirement for records.

(6) Objections to, and rulings on, offers of evidence must be made on the record.

R 418.98 Testimonial evidence.

Rule 18. (1) The testimony of all witnesses must be upon oath or affirmation.

(2) Witnesses must be sequestered at the request of a party or by the magistrate on his or her own initiative.

(3) Opposing parties are entitled to cross-examine witnesses subject to the provisions of R 418.94(2).

(4) The testimony of medical experts and vocational consultants may be taken by deposition. A party taking a deposition shall give reasonable notice to all parties. The magistrate may limit the time, manner, and place where the deposition occurs.

(5) At the discretion of the magistrate, other witnesses may testify by deposition before trial. The magistrate may limit the time, manner, and place where the deposition testimony occurs.

(6) At the discretion of the magistrate, and for good cause shown, the testimony of medical experts and vocational consultants not presented at the scheduled trial date may be taken by deposition after the conclusion of the lay testimony in accordance with the following:

(a) The plaintiff shall take such depositions within 42 days after the trial date.

(b) The defendants shall take such depositions within 56 days after the trial date.

(c) Transcripts must be filed with the magistrate within 72 days of the completion of lay testimony.

(7) All depositions taken in advance of the trial date must be filed with the magistrate on the trial date.

R 418.99 Case resolution by order and opinion; redemptions of liability; attorney briefs; correction of mistakes in order or opinion.

Rule 19. (1) A case that is assigned to a magistrate must be resolved by an order and, when applicable, an opinion. The order, and when applicable, the opinion, must be written within 42 days of the closing of the record, except under extenuating circumstances as determined by the chairperson of the board.

(2) Except under extenuating circumstances as determined by the chairperson of the board, all cases assigned to a magistrate that proceed to hearing must be resolved by opinion written within 42 days of closing the record and must be prepared for mailing.

(3) All redemption hearings agreements must be either approved or denied by the issuance of a redemption order.

(4) A reversionary interest clause contained in a redemption agreement must be clearly labeled and disclosed to the magistrate, who shall make an express finding as to whether the clause is in the best interests of the employee as required by section 836(1)(a) of the act, MCL 418.836.

(5) All lump sum applications must be either approved or denied by the issuance of an order.

(6) In cases that are resolved by voluntary payment, there must be a written voluntary pay agreement and an order dismissing the application.

(7) In cases that are resolved by voluntary withdrawal of an application, there must be a written order of dismissal.

(8) Within the appeal period provided, a magistrate may on his or her own initiative correct a mistake in the order or opinion. Parties may stipulate to the corrections pursuant to section 851 of the act, MCL 418.851. Any corrections require a corrected order or opinion, or both, and must specify the corrections made.