

**BRUYNS Fred H \* DCBS**

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**From:** Andrea Olson <andrea.olson8888@gmail.com>  
**Sent:** Monday, May 21, 2018 12:15 PM  
**To:** BRUYNS Fred H \* DCBS  
**Cc:** MCCOMAS Roger B \* DCBS; BREITENSTEIN Adam J \* DCBS; CLARK Christopher M \* DCBS; BAKER Lorrie D \* DCBS; PACE Ana K \* DCBS; OSTRAND-PONSIOEN Cathy \* DCBS  
**Subject:** Re: Extension of comment period for proposed worker leasing rules

Hi Fred-

Thank you for extending written comment to today. Here is the LinkedIn post with my public comment:  
<https://www.linkedin.com/pulse/dont-change-oregon-leasing-rules-andrea-olson/>

I also published my public comment separately on Medium:  
<https://medium.com/@andrea.olson8888/public-comment-re-changes-to-oregons-worker-leasing-rules-7d24b1ad1291>

It would be helpful to meet with Ms. Lorrie Baker and those who have been aware of my case for several years in the near future, to help me understand the relationship that Oregon has with MBO Partners.

Thank you again for the opportunity to offer public comment.

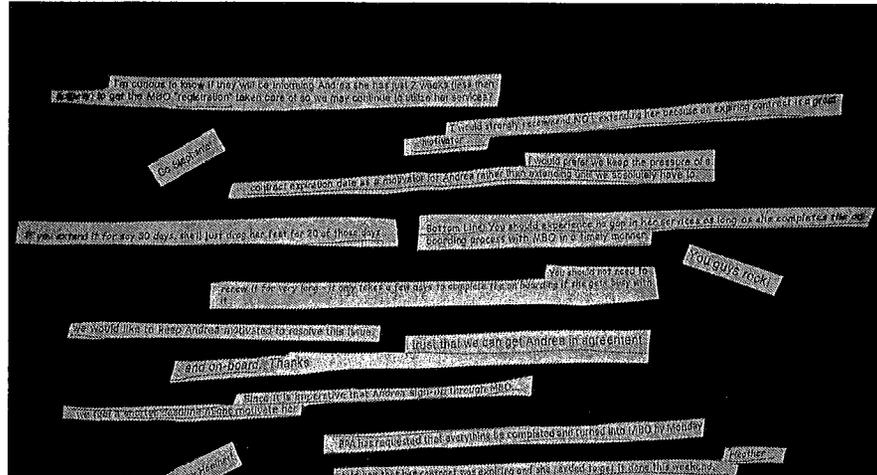
Andrea Olson

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A collage of communications between BPA and MBO personnel when I was forced by BPA to 'sign up' with MBO under duress.

# Don't Change Oregon Leasing Rules

Published on May 21, 2018



Andrea Olson | Follow  
Owner, Pacific Disability Management LLC

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On March 29, 2018, the Oregon Division of Consumer and Business Services (DCBS) invited public comment on proposed changes to Workers' Compensation Rules:



<http://wcd.oregon.gov>  
March 29, 2018 Proposed Changes to Workers' Compensation Rules Caption: Worker leasing licensing, workers' compensation coverage of clien...

On April 24, 2018, I provided verbal public comment on the proposed changes. All of the other people in the room who provided public comment were representatives of employers/staffing firms. I was the sole voice and a former worker.

Shortly thereafter, notice of written public comment on the proposed changes was extended to today, May 21, 2018:

## Extension of comment period through May 21, 2018

**Caption: Worker leasing licensing, workers' compensation coverage of clients, recordkeeping, and reporting**

Dear committee members and other interested people,



The Workers' Compensation Division has extended the comment period for the proposed rules affecting worker leasing, [http://wcd.oregon.gov/laws/Documents/Proposed\\_rules\\_and\\_testimony/Div-050-180-2018-04-24/50\\_180-18XXXp-notice-extension.pdf](http://wcd.oregon.gov/laws/Documents/Proposed_rules_and_testimony/Div-050-180-2018-04-24/50_180-18XXXp-notice-extension.pdf):

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OAR 436-050, Employer/Insurer Coverage Responsibility, and

OAR 436-180, Worker Leasing.

The closing date for written comments, originally set as April 30, 2018, is extended through (and includes) May 21, 2018.

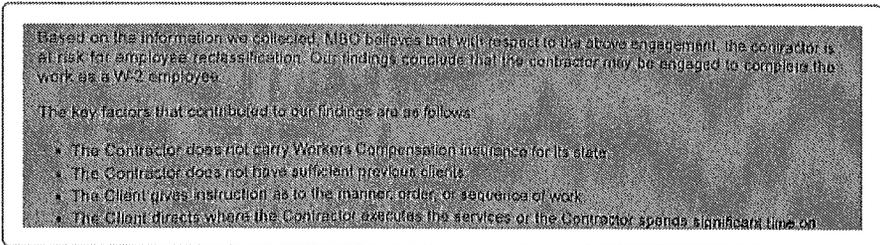
Written comments may be sent to:

[fred.h.bruyns@oregon.gov](mailto:fred.h.bruyns@oregon.gov)

Fred Bruyns, rules coordinator

Workers' Compensation Division

As a citizen of Oregon, I am providing a lengthy public comment based on my personal experience alerting Oregon Workers' Compensation Division to concerns raised in 2014:



Public Comment re: Changes to Oregon's Worker Leasing Rules

<http://medium.com>

I, Andrea Olson, appreciate the opportunity to offer public comment about the proposed changes to worker leasing rules.

Don't change Oregon's worker leasing rules as proposed until the state enforces current laws, holds accountable those abusing existing laws/rules, and includes participation/input from individuals and organizations representing workers' rights at all stakeholder meetings.

The gig economy exploits both blue- and white-collar workers and attempts to legitimize the gig economy in any way should be prohibited. Changes to Oregon's worker leasing rules impact the definitions of various worker types in this state and these changes are not in line with the mission of the Oregon Workers' Compensation Division to advance a leading worker's compensation system that represents integrity and fairness for Oregonians.



Thank you.

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**Andrea Olson**  
Owner, Pacific Disability Management LLC  
16 articles

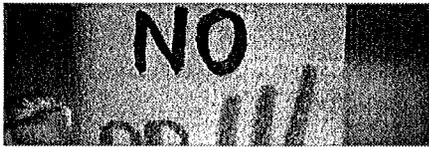
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I'm curious to know if they will be informing Andrea she has just 2 weeks (less than actually) to get the MBO "registration" taken care of so we may continue to utilize her services?

Go Stephanie!

I would strongly recommend NOT extending her because an expiring contract is a great motivator..

I would prefer we keep the pressure of a contract expiration date as a motivator for Andrea rather than extending until we absolutely have to

If you extend it for say 30 days, she'll just drag her feet for 20 of those days.

Bottom Line: You should experience no gap in her services as long as she completes the on-boarding process with MBO in a timely manner.

You should not need to renew it for very long - it only takes a few days to complete the on boarding if she gets busy with it.

You guys rock!

we would like to keep Andrea motivated to resolve this issue.

I trust that we can get Andrea in agreement

and on-board. Thanks

Since it is imperative that Andrea sign-up through MBO,

we feel a shorter deadline might motivate her

BPA has requested that everything be completed and turned into MBO by Monday

Heather

Heather

could see that her contract was expiring and she needed to get it done this weekend.