

BRUYNS Fred H * DCBS

From: Andrea Olson <andrea.olson8888@gmail.com>
Sent: Friday, April 27, 2018 9:02 AM
To: BRUYNS Fred H * DCBS
Cc: ISENHART Ellie M * DCBS; CLARK Christopher M * DCBS; BREITENSTEIN Adam J * DCBS; MCCOMAS Roger B * DCBS
Subject: Re: Extension of comment period for proposed rules on worker leasing

Hi Mr. Bruyns-

Thank you for your message. I think there may be confusion regarding your statement: "Please keep in mind that we cannot amend the rules based on verbal testimony directed at the worker leasing rules unless that testimony was provided at the public hearing."

I am not asking that the rules be amended based on verbal testimony. I am asking that the rules NOT be changed until we identify why current laws/rules are not being followed and hold accountable those who are not enforcing CURRENT laws and rules. Multiple gov't agencies failed to enforce current laws. Then we need to know, understand, and validate the NEED to change current laws/rules. This is in line with the mission of your department- integrity and fairness to Oregonians.

I look forward to meeting with members of your staff soon we we may review the relationship of MBO Partners with the state of Oregon, starting with your agency.

From what I understand, stakeholders were the ones who were involved in proposing changes to current rules. Will you please offer a breakdown on the stakeholders who represented workers' perspectives and the stakeholders who represented employers'/staffing agencies' perspectives?

I do not know who will be coordinating the date and time for a meeting and look forward to hearing from you or someone from your staff soon.

Thanks again.
Andrea

On Fri, Apr 27, 2018 at 8:42 AM, BRUYNS Fred H * DCBS <Fred.H.Bruyns@oregon.gov> wrote:

Good morning Andrea,

I am forwarding your request for a meeting to staff with oversight of the worker leasing program. Please keep in mind that we cannot amend the rules based on verbal testimony directed at the worker leasing rules unless that testimony was provided at the public hearing.

I have attached records showing who we contacted on 4/26. For many customers, we have only email addresses. Email addresses are exempt from public disclosure under ORS 192.355(40), but I have provided domain names, including many duplicates to show how many contacts were made for each domain name. (Anyone may subscribe to our listserv to be notified about rulemaking, training opportunities, etc. The subscription sign-up page is here: <https://service.govdelivery.com/accounts/ORDCBS/subscriber/new>.)

In addition, we notified the Management-Labor Advisory Committee, and a roster of members is here: <http://www.oregon.gov/dcb/mlac/Pages/members.aspx>.

The notice also went to two legislators: Senator Kathleen Taylor, Chair, Senate Committee On Workforce, and Representative Paul Holvey, House Committee On Business and Labor.

Notice went to everyone who testified on Tuesday (from the roster): Andrea McHenry, Insperity; Will Rasmussen, Miller Nash /BBSI; Arin Carmack, Cardinal Services; Matthew Stopher, KPD Insurance & Risk Solutions; Daniel Harris, NAPEO; Sam Lambert, Mid Oregon Personnel; and Andrea Olson, Citizen.

An abbreviated notice went to a Department of Consumer and Business Services Twitter account. I do not have access to subscriber information for Twitter, but I am forwarding your request to our Director's Office.

You should receive three attachments. Please let me know if you have any questions.

Thank you,

Fred Bruyns, policy analyst/rules coordinator

Department of Consumer and Business Services

Workers' Compensation Division

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