

May 15, 2026

MARIE ROGERS  
POLICY ANALYST/RULES COORDINATOR  
WORKERS' COMPENSATION DIVISION  
DEPT. OF CONSUMER & BUSINESS SERVICES  
350 WINTER ST. NE  
SALEM, OR 97312

Re: Written comments regarding WCD's rulemaking advisory committee on OAR 436-180 and -162 and OAR 836-043

Dear Ms. Rogers,

SAIF Corporation thanks the Workers' Compensation Division (WCD) for the opportunity to provide additional written comments following the April 28, 2026, rulemaking advisory committee meeting on worker leasing rules. SAIF offers the following additional comments for the division's consideration regarding Issue 7.

At the advisory meeting, SAIF expressed its preference for the WCD to require insurers to provide coverage to professional employer organizations and their client employers on a multiple coordinated policy basis. At that time, SAIF did not have a proposed date for policies incepting or renewing on or after July 1, 2027.

After further review, SAIF proposes the changes apply to policies incepting or renewing on or after January 1, 2028. SAIF will need to gather experts from multiple divisions to change and test existing computer systems to align with the timelines and changes to ensure system changes work as intended. SAIF also requires time to adjust and update our internal processes and workflows. Additionally, the impact of the changes is significant when layered onto existing IT projects and programs. SAIF appreciates the WCD's consideration of these factors as it drafts proposed rules.

As always, SAIF appreciates the WCD's engagement and commitment to the rulemaking process as well as its collaborative approach.

Sincerely,

/s/ Elaine Schooler  
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