



Providence, Oregon
4400 NE Halsey
Building 2, Suite 599
Portland, OR 97213
providence.org

June 18, 2026

Management-Labor Advisory Committee
Department of Consumer and Business Services
360 Winter Street NE
Salem, OR 97309

Re: OAR 436-015, Managed Care Organizations

Dear Rules Advisory Committee Members,

Providence is a not-for-profit, mission-driven health system serving patients and communities throughout Oregon. We are committed to ensuring access to high-quality, affordable care and to advancing policies that strengthen the health care system and the communities we serve. While intended to address concerns regarding MCO-provider interactions, the proposed rule change would significantly restrict provider communication that is essential to effective care coordination and timely return-to-work outcomes for injured workers. Therefore Providence opposes the proposed rule.

MCOs were established to improve access, quality, and coordination of care within Oregon's workers' compensation system. Facilitating communication among providers, employers, insurers, and injured workers is a core function of that role. Restricting communication between MCOs, and treating providers would likely result in delays, fragmented care, and reduced coordination of services, particularly in rural and underserved areas where access challenges already exist.

Importantly, attending physicians retain full authority over all medical determinations, including medically stationary status, work capacity, and impairment findings. MCO engagement on these topics does not replace or interfere with physician decision-making. Rather, it supports physicians by helping identify barriers to care, facilitating treatment planning, coordination services, and supporting timely recovery and return-to-work outcomes. These activities are fundamental components of care coordination and should not be conflated with claims processing.

To the extent concerns exist regarding MCO-provider communications, existing oversight and accountability mechanisms are already in place to address those concerns. Specific issues should be addressed through targeted guidance, oversight, or enforcement rather than broad restrictions that may reduce care coordination for injured workers.

We recognize that some injured workers have experienced challenges navigating the workers' compensation system, and those experiences deserve consideration. At the same time, any policy

changes should be evaluated carefully for their broader impact on access to care, provider collaboration, and recovery outcomes. Changes that substantially limit communication between MCOs and treating providers may create unintended consequences for injured workers who benefit from coordinated support throughout their recovery.

For these reasons Providence respectfully urges the committee not to adopt the proposed rule.

Jackie Fabrick
Senior Government Affairs Officer
Providence Health & Services