November 10, 2026

Marie Rogers
Policy Analyst / Rules Coordinator
Workers' Compensation Division
350 Winter Street NE
Salem, OR 97301

Dear Marie Rogers,

My name is Sara Duckwall, and I have been a Management Member of the Management Labor Advisory Committee (MLAC) since November of 2021. I am currently following the Managed Care Organizations (MCO) rule making advisory committee discussions and would like to provide written comment. Please note, my comments are my own opinion, and I am not acting in my capacity as an MLAC member. I only reference my position on MLAC to provide context for my opinion.

As part of MLAC I took part in the April, 2022 MCO discussions. In my recollection, MLAC generally recognized opportunities for refinement within the system that is functioning as intended, versus a need for it to be materially overhauled. As read, the current proposals go beyond refinement and could materially change how the system operates regarding MCOs.
I am not going to address each proposed Issue individually, but instead I will provide an overall opinion of what I see the potential outcome could be to the system in whole:

- **Impact on medical case management:** Effective medical case management requires communication, coordination, and active engagement in treatment planning. The proposed amendments to Issues 8–11 would shift MCOs from proactive care coordination and oversight of care quality to reactive administration.
- **Unnecessary restrictions:** The proposals appear focused on limiting MCO activity rather than improving outcomes and add administrative burden and barriers to collaboration.
- **Existing safeguards:** Pathways to address the concerns raised already exist, with no data presented demonstrating they are insufficient.
- **System performance:** Oregon's workers' compensation system has performed well under the managed care framework established by the reforms.
- **Material change:** Proposals that fundamentally alter how MCOs operate warrant scrutiny before adoption and should be data informed.

Adding barriers, administrative burden and moving towards reactive administration will not, in my opinion, benefit the Workers Compensation system nor will it provide better outcomes for patients. Thank you for accepting my written comments.

Sincerely,

Sara M. Duckwall

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Sara M. Duckwall