

Date: February 10, 2026
To: Chair Nosse and Members of the House Health Care Committee
From: Ivo Trummer, Government Relations Director, ivotru@saif.com
Elaine Schooler, Assistant General Counsel, elasch@saif.com
Re: **SAIF opposes HB 4119**

SAIF is Oregon's not-for-profit workers' compensation insurance company and the leading workers' compensation insurance carrier in Oregon. Since 1914, we've been taking care of injured workers and helping them get back to work. Through our partnership with Oregon employers, we worked to advance workplace safety in Oregon, reducing the total number of injuries and keeping costs affordable for employers. We're proud to be the workers' compensation provider of choice for the majority of Oregon employers, from thousands of small businesses to some of the state's economic leaders; as well as insuring over 1,200 public entities: state agencies, public universities, cities, counties, special districts, and school districts throughout the state. Covering more than half a million local workers each day, SAIF is committed to helping Oregon work better, smarter, and safer.

SAIF strongly supports the Management Labor Advisory Committee (MLAC) and its statutory role in advising the legislature on issues concerning Oregon's workers' compensation system. MLAC is the appropriate place to continue to debate the efficacy of these – and other – proposed policy changes to Oregon's workers' compensation system. MLAC and Oregon's current workers' compensation system were created in response to the 1980s, when Oregon had one of the worst workers' compensation systems in the nation. Between 1978 and 1989, workers' compensation premiums paid by employers nearly doubled. In 1989, Oregon nationally ranked 6th highest in premium costs, highest in frequency of workplace injury claims and claims resulting in disability, and 3rd highest in total medical costs per claim. The 1990 Mahonia Hall reforms (passed by the legislature in a one-day special session) created a comprehensive system establishing safety programs to reduce injuries, mandated safety committees comprised of labor and management, expanded return-to work programs, improved worker benefits, and controlled medical and litigation costs. To this day, Oregon's workers' compensation system remains a balanced system that delivers quality care to injured workers and remains affordable to Oregon employers. While subsequent changes to Oregon's workers' compensation system have occurred since the reforms, the changes were approached through MLAC's goal of ensuring balance, fairness, affordability, efficiency, and stability.

In their meeting on February 5th last week the members of MLAC voted unanimously to not support HB 4119.

SAIF opposes HB 4119, which would, in part, remove the number of days or visits that a chiropractor may serve as the attending physician (AP). There are no limitations on access to chiropractic treatment for injured workers but a scheduled transition of care to an AP that provides access to other treatment modalities including on-going chiropractic care.

SAIF's data shows that most workers (86.2%) who treat with a chiropractor for a low back or neck sprain and strain claim, already have fewer visits than the current limit of 18 visits. Our data also shows treatment costs for chiropractors are higher compared to other provider types. As a result, we are concerned that removing the attending physician limitation will increase costs and put an undue burden on employer premiums.

We have previously provided some of the following information and data below to MLAC and the Oregon Legislature when asked whether chiropractors' attending physician restrictions should be removed in Oregon's workers' compensation system.

In Oregon, the AP is responsible for the following:

- Directing and managing treatment of injured workers.
- Determining the worker's physical ability to stay at work and return to work which may result in time loss benefits.
- Deciding when the worker's condition is medically stationary.
- Determining any permanent physical and/or work restrictions at claim closure.

The range of workers' compensation injuries span from a sprain or strain, to occupational diseases, to catastrophic injuries that may render an injured worker totally and permanently disabled. Oregon's workers' compensation system seeks a fair system that balances workers' access to appropriate and high-quality medical care while maintaining an affordable system for employers at the same time. It is this balancing act that has ensured the health of our system for the last decades.

Chiropractors are an integral part of the current workers' compensation system, and many injured workers benefit from their care. Chiropractors can treat injured workers within the workers' compensation system as an AP – for 60 days, or 18 visits, whichever comes first. After 60 days, or 18 visits, they can continue treating the injured worker if an AP approves and recommends continued chiropractic care. Chiropractors are not MDs (or DOs, PAs, NPs), and they treat different things, and it seems appropriate that there is a scheduled transition of care, and an assessment as to continued treatment which may or may not include ongoing chiropractic care.

While chiropractic care has its benefits, the cost of chiropractic care in Oregon exceeds costs compared to other medical providers in the workers' compensation system. The following numbers are based on SAIF claims only and cover low back and neck sprain and strain claims.¹

- According to our data, 86.2% of claims involving chiropractic care have fewer than 18 visits.
- For disabling claims, 47.9% of workers receive some type of medical care after 60 days when a chiropractor has served as AP. This compares to 41.0% of workers who receive additional medical care after 60 days when another provider has served as AP for the first 60 days.
- The average number of physical medicine visits per claim with a chiropractor serving as AP is 10.3 visits over 60 days. This compares to other providers (MD, DO, PA, NP) with an average number of 6.6 visits for a sprain/strain over 60 days.
- SAIF data shows that the average physical medical cost for these claims is higher with chiropractors than with other provider types – \$1,747 on average versus \$1,330 on average with other provider types.
- The average total medical cost for these claims when a chiropractor serves as AP is \$4,902. This compares to other providers with an average of \$4,541 in total medical costs.

SAIF is committed to continuing our engagement around access to care issues and to ensuring Oregon's workers' compensation system remains a balanced system that delivers quality care to injured workers and remains affordable to Oregon employers.

¹ Some of these data points will fluctuate a bit over time as data related to individual claims continues to be updated. These numbers cover claims with an injury date between 1/1/2018 to 11/30/2025.