



**CITY OF PORTLAND**  
OFFICE OF MANAGEMENT AND FINANCE

Charlie Hales, Mayor  
Fred Miller, Chief Administrative Officer  
Bryant Enge, Director, Bureau of Internal Business Services

Kate Wood, Manager  
Risk Management  
1120 S.W. Fifth Avenue, Rm. 709  
Portland, Oregon 97204-1912  
(503) 823-5101  
FAX (503) 823-6120  
TTY (503) 823-6868

February 4, 2016

Management Labor Advisory Committee Members

Re: HB 4052

Dear MLAC members:

We have read the bill, along with written testimony from OIW and Saif. We've also reviewed DCBS statistics of complaints received over the last 4 years.

The City of Portland does not support this bill for the following reasons:

- OAR 436-060-0015 and 436-010-0241 already address insurer and self-insured employer requirements to notify injured workers that medical care cannot be directed.
- The proposed revised Form 440-3283 does not take into consideration that many employers in the State utilize MCO's and thus would be exempt.
- It is an unnecessary administrative burden for injured workers and employers.
- There is already a mechanism to report specific complaints at DCBS. The number of complaints remain extremely low in number in comparison to the total number of claims filed in Oregon annually.

Regards,

Susan Quinones  
WC Manager

Linh Vu  
Deputy City Attorney

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