

Date: January 29, 2026
To: Management Labor Advisory Committee
From: Ivo Trummer, Government Relations Director, ivotru@saif.com
Re: Elaine Schooler, Assistant General Counsel, elasch@saif.com
SAIF analysis for treatment of sprains and strains comparing chiropractors to other providers

We have previously provided some of the data below to the Oregon Legislature when asked whether attending physician restrictions for chiropractors should be removed in Oregon's workers' compensation system. While there is no proposed legislative concept, bill, or amendment in front of MLAC for your consideration at this time, we nevertheless wanted to also share our data with you.

In Oregon's workers' compensation system, the attending physician (AP) is responsible for all of 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 a Type A attending physician or a PA or NP approves and recommends continued chiropractic care. A Type A attending physician is an MD, DO, DMD, DPM and is not limited in the number visits or duration of treatment they can provide. Chiropractors are not MDs (or DOs, DMD, DPM 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 significantly 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

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.

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. We strongly believe that the Management Labor Advisory Committee is the appropriate place to continue to debate the efficacy of these – and other – proposed policy changes to Oregon's workers' compensation system.