

August 7, 2025

JOY DOUGHERTY, BOARD CHAIR  
WORKERS' COMPENSATION BOARD  
2601 25TH ST. SE, STE. 150  
SALEM, OR 97302

Re: Request for proposed concept regarding cost bill procedures

Dear Board Chair Dougherty and Board Members:

SAIF Corporation and the Oregon Trial Lawyers Association jointly request the Workers' Compensation Board consider a proposed concept to review and revise its process for cost bill submissions after a claimant prevails against a denial and whether additional documentation should be submitted prior to reimbursement by the insurer under OAR 438-015-0019.

The request stems from stakeholder discussions on HB2799 during the 2025 legislative session. HB2799 increased the maximum reimbursable amount, absent extraordinary circumstances, to \$3,500 from the current \$1,500 cap for records, expert opinions, and witness fees that are subject to reimbursement when a claimant finally prevails against a denial. During stakeholder discussions, the cost bill process was agreed to be an area that could be improved through standardization and verification of the cost. The parties see a timely opportunity to request the board improve the cost bill process as it implements the changes from HB2799.

The parties appreciate the board's consideration of this topic when planning its next quarterly meeting.

Thank you for your time and attention to this matter. Please notify the parties if additional information is needed.

Sincerely,

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