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## Jeanne Vogel named DLI's SCF director

Jeanne Vogel recently became the director of the Department of Labor and Industry's (DLI's) Special Compensation Fund (SCF) after serving as the SCF assistant director since May 2025.

Vogel obtained her master's degree in rehabilitation counseling from St. Cloud State University and spent more than 25 years working with DLI's Vocational Rehabilitation unit as a qualified rehabilitation consultant, supervisor and director. She has been involved in many Workers' Compensation Division initiatives, including rulemaking, technology-related projects and stakeholder outreach.

In addition, she contributes to many DLI cross-functional teams, including the Equity Action Committee, Mentorship Program, Safety and Health Committee, and Sustainability Committee. Vogel looks forward to continuing to serve Minnesotans in her new role within the agency.



Jeanne Vogel

## Insurance lookup updated for zero estimated exposure policies

In connection with the 2025 legislation related to zero estimated exposure and wrap-up policies for employers providing building construction or improvement purposes, the workers' compensation insurance lookup tool was updated and now includes an indicator for those employers with zero estimated exposure workers' compensation policies and reported construction class codes. The Department of Labor and Industry has a [webpage with more information about the changes](#).

As a reminder, the Minnesota Legislature adopted requirements related to zero estimate exposure and wrap-up policies for workers' compensation coverage for any employer providing building construction or improvement services. These requirements became effective Jan. 1, 2026.



## DLI's PTSD-related webpage, resources updated

The Department of Labor and Industry's (DLI's) Workers' Compensation Division has been working to update its online resources. The current update focus is on post-traumatic stress disorder (PTSD).

The [new PTSD webpage](#) offers links to the recent PTSD study and various PTSD-related resources. The webpage will continue to be updated as additional resources are finalized and published.

The screenshot shows the DLI website header with navigation links: DIRECTORS, CONTACT US, CHECK A LICENSE, GET A PERMIT, RENEW A LICENSE, MAKE A MINUTE. Below the header, there are three main sections: ABOUT THE DEPARTMENT, FOR BUSINESS, and FOR WORKERS. The main content area is titled "POST-TRAUMATIC STRESS DISORDER" and includes an overview of PTSD in Minnesota workers' compensation, a list of criteria for PTSD, and a list of resources for contractors.

**DEPARTMENT OF LABOR AND INDUSTRY**

**POST-TRAUMATIC STRESS DISORDER**

*The following information contains general information, subject to statutory change, and is not legal advice.*

**Overview of PTSD in Minnesota workers' compensation**

In 2013, the Minnesota Legislature amended the Workers' Compensation Act by making post-traumatic stress disorder (PTSD) the only compensable stand-alone psychological injury in the Minnesota workers' compensation system. For injuries occurring on or after Oct. 1, 2013, work-related PTSD is compensable without an accompanying physical injury, provided the PTSD:

1. arose out of and in the course of employment;
2. was diagnosed by a licensed psychiatrist or psychologist according to the most recently published edition of the DSM; and
3. did not result from a disciplinary action, work evaluation, job transfer, layoff, demotion, promotion, termination,

**APPRENTICESHIP AND DUAL TRAINING**

**CODES AND LAWS**

**CONSTRUCTION CONTRACTOR REGISTRATION**

**ELECTRICAL CONTRACTORS**

**ELEVATOR CONTRACTORS**

**EMPLOYMENT PRACTICES**

**HIGH PRESSURE PIPING CONTRACTORS**

## Request for feedback on rule draft: Possible amendment to rules governing workers' compensation treatment parameters

The Department of Labor and Industry (DLI) published a [Request for Comments](#) in the *State Register* (page 1004) Feb. 24, 2025, requesting comments about its possible amendment to rules governing workers' compensation treatment parameters – specifically, amendments for medical imaging and injections in Minnesota Rules, parts 5221.6100, 5221.6200 to 5221.6305, and 5221.6600.

DLI, in consultation with the Medical Services Review Board, developed an initial working rule draft focusing on possible amendments for injections. DLI is seeking feedback from interested persons or groups regarding the rule draft available on DLI workers' compensation [rulemaking docket webpage](#).

If you have questions or would like to provide feedback about the initial rule draft, contact Alexis Johnson by March 27, 2026, at 651-284-5006 or [dli.rules@state.mn.us](mailto:dli.rules@state.mn.us).



## 'No WID online' request process transitions to DLI from CAH

In partnership with the Court of Administrative Hearings (CAH), the Department of Labor and Industry (DLI) will now respond directly to all "No WID online" requests that are submitted to the "No WID online" email address.

A worker identification (WID) number, which is person-specific, is generated by DLI and is used instead of a Social Security number to identify workers' compensation claims.

CAH requires a WID number when e-filing a dispute to consider the submission complete.

When a WID number cannot be found, the first step is to use the [WID number lookup process](#) in Work Comp Campus. If a WID number still cannot be found after using the Campus lookup process, a request for a WID number may be sent to the "No WID online" email address using the steps below.

### To request a WID number

If a user is unable to locate a WID number for an injured worker using the Campus WID number lookup, they should:

- email a request for a WID number to [nowidonline@state.mn.us](mailto:nowidonline@state.mn.us); and
- attach their initiating documents and a screenshot of the Work Comp Campus WID number search results showing no WID number exists.

When the request is received, it will be reviewed and, if the injured worker can be identified, a WID number will be provided directly by DLI. If more information is required to identify the injured workers' WID number, DLI will reach out to the person making the request.

The person making the request is responsible for e-filing their documents after a WID number is provided. Any C-Track filing questions should be referred to CAH.

Questions about the process can be directed to the Workers' Compensation Help Desk at 651-284-5005 (press 3), 800-342-5354 (press 3) or [helpdesk.dli@state.mn.us](mailto:helpdesk.dli@state.mn.us).

## Reminder about paying, denying medical bills

Recently, the Department of Labor and Industry (DLI) has noticed an increase in the number of questions about payment or denial of medical bills. Payer and health care provider payment and billing responsibilities are outlined in Minnesota Statutes section 176.135, subdivisions 6 and 7, and Minnesota Rules part 5221.0600. Excessive charges are covered under Minn. R. part 5221.0500.

### What are a health care provider's responsibilities related to billing?



- A health care provider must electronically submit an itemized statement of charges on the prescribed billing form to the payer within 60 days of the service and submit copies of medical records or reports that substantiate the nature of the charges and their relationship to the work injury. A health care provider cannot attempt to collect or initiate any action for collection of the charge until the further information required has been furnished.
  - Under Minn. Stat. section 176.136, subd. 2a, the commissioner may assess penalties, costs and expenses against a health care provider that collects or attempts to collect payment from an employee in violation of the workers' compensation law.
- If the insurer has denied primary liability, the health care provider can bill the employee.
- If the employee's health insurance pays the medical expenses on a denied claim, the insurance company has a right to reimbursement if it is later determined the charges are due to a compensable injury.

### What are the payer's responsibilities related to payment or denial of medical bills?

As soon as reasonably possible, but no later than 30 calendar days after receiving the charge for service and the supporting medical records, the insurer must:

- pay the charge or any portion of the charge that is not in denied;
- if more information is needed, make a request for specific additional information to substantiate the nature of the charge and its relationship to the work injury (when the requested information is received, the insurer has 30 days to either pay or deny the charge in question);
- deny all or part of the charge if it is not compensable; or
- deny all or part of the charge if the charge is excessive.
  - If the charge is denied, the insurer must send the provider a written notification outlining the basis of the denial by the 30-day deadline. A copy of the notification must be sent to the employee.

### What about excessive charges?

- Denying all or a portion of a medical bill on the basis the charge or charges are excessive may only be done in certain circumstances, as detailed under Minn. Stat. section 176.136, subd. 2, and Minn. R. part 5220.0500, subp. 1.
- Bills may not be denied on the basis that the charge is excessive solely because there are cheaper alternatives for the same service, article or supply available from other places, such as an online retailer.

Failure to comply with these requirements may subject the payer to penalties.

### Where to get more information?

For answers to questions about medical records, email DLI's medical policy staff at [medical.policy.dli@state.mn.us](mailto:medical.policy.dli@state.mn.us).

# Ask the ADR and Work Comp Campus pro

## DLI's Alternative Dispute Resolution unit answers frequently asked questions

By Brian Mak and Patti Provencher, Alternative Dispute Resolution

*Editor's note: The Alternative Dispute Resolution unit at the Minnesota Department of Labor and Industry seeks early intervention in workers' compensation disputes through conferences and mediations. It handles calls from the Workers' Compensation Help Desk and responds to questions from all stakeholders.*

**Q.** When I am initiating a dispute, do the parties populate automatically?

**A.** Yes, with some recent improvements to Work Comp Campus, if you are the attorney for a party, Campus will automatically select the other primary parties to the dispute in the "Identify Other Parties in Dispute" section. If you think there is an error, you can "unclick" to remove a party, but you will almost always want to keep those other parties there to be a party to the dispute. It is important the parties to the dispute be accurate because that will determine who can respond to the dispute.

**Q.** I received a *Request for Assistance* or a *Request for Certification* from a filing party. Can you clarify how I respond?

**A.** First, the Alternative Dispute Resolution (ADR) unit team will be reaching out to an attorney or adjuster to determine if there is a genuine dispute and if the matter can be resolved.

If the filing was a *Request for Certification*, you should respond to the requesting arbitrator what your position is. A *Medical Response* or *Rehabilitation Response* is premature as a response to a *Request for Certification*.

If the filing is a *Request for Assistance*, the appropriate action is to file a *Medical Response* or *Rehabilitation Response*.

**Q.** When and why do I need to file a *Notice of Appearance* or *Notice of Representation* in Campus?

**A.** As soon as you have been retained, you should file a *Notice of Appearance* or *Notice of Representation* in the Campus claim (CL-XX-XXXX-XXX) in which you are representing a party. If a dispute (DS-XX-XXXX-XXX) was filed with a claim shell and you only file a notice in the dispute, you will not have access to all the documents on file with the Department of Labor and Industry for that claim when it is identified and you will not be recognized as the attorney of record for that claim.

Additionally, if there is a new or different filing, regarding a different dispute, you may not be listed as the attorney of record unless you file a *Notice of Appearance* under that claim. If you need assistance determining the claim number, you can call the Workers' Compensation Help Desk.

Remember, C-Track is with the Court of Administrative Hearings (CAH) and is a separate filing system. If there is litigation at the Court of Administrative Hearings, you should file a separate notice through C-Track to be noted as the attorney of record there and to receive service of filings there.

## Mileage rate increases for 2026



*The standard IRS mileage rate for the business use of an employee's personal vehicle for 2026 increased Jan. 1:*

- from 70 cents a mile,
- to 72.5 cents a mile.

## Translated webpages, materials, Language Line available via DLI website

The Department of Labor and Industry (DLI) posts its available translated materials online at [dli.mn.gov/translations](https://dli.mn.gov/translations). It has documents available in Chinese, Hmong, Karen, Somali and Spanish. A few other documents throughout the website are available in additional languages.

The DLI website now also provides Google Translate near the upper left corner of each page, allowing visitors to choose the language for the website text.

In addition, DLI has access to Language Line, a free language translation phone service for limited-English speakers. If DLI help is needed, view the contact information at [dli.mn.gov/about-department/about-dli/contact-us](https://dli.mn.gov/about-department/about-dli/contact-us), call and a DLI employee will get in touch with an interpreter in the needed language.



## Workers' compensation, Campus assistance available by phone, email

The Workers' Compensation Help Desk is available to answer basic questions related to workers' compensation or Work Comp Campus. It will also route more complex questions to subject matter experts within the Workers' Compensation Division.

Live support is available 8 a.m. to 4:30 p.m., Monday through Friday (except holidays). Voicemail messages left outside of office hours will be responded to within 24 hours of the next business day.

- 651-284-5005 (press 3)
- 800-342-5354 (press 3)
- [helpdesk.dli@state.mn.us](mailto:helpdesk.dli@state.mn.us)



## COVID-19 claim duration, identifying long COVID

The COVID-19 pandemic introduced unprecedented challenges for workers, employers and compensation systems. In Minnesota, legislative measures, such as the COVID-19 presumption law, aimed to streamline workers' compensation claims for employees at high risk of workplace exposure. However, as the pandemic evolved, a new concern emerged – long COVID, a condition characterized by persistent symptoms well beyond the typical recovery period. This article examines the impact of Minnesota's presumption law, trends in COVID-19 claims and the growing complexity of identifying and managing long COVID cases within the workers' compensation framework.

Effective April 8, 2020, through Jan. 13, 2023, [Minnesota's presumption law](#) simplified workers' compensation eligibility for certain frontline employees who contracted COVID-19. (Note: The presumption did not apply for dates of injury, Jan. 1 through Feb. 2, 2022.) Covered employees included peace officers, firefighters, paramedics, EMTs, nurses and health care workers, correctional officers and security counselors in state or local facilities, health care providers and assistive staff in hospitals, home care or long-term care settings, and individuals providing childcare for first responders and health care workers. Under this law, workplace exposure was automatically presumed, though employers retained the right to rebut the presumption. The date of injury was defined as the first day the employee could not work due to COVID-19 symptoms or a positive diagnosis.

With the expiration of the presumption law in January 2023, initial COVID-19 claim volumes declined sharply. This may also be attributed to external factors such as natural declines and immunity due to COVID-19 vaccines. However, long COVID, a condition involving prolonged symptoms beyond the standard 90-day recovery window, has introduced new complexities. While most cases are resolved within three months, a subset of workers experience persistent symptoms, sometimes resulting in permanent partial disability.

To support affected employees, [Minnesota's Employer Reasonable Accommodation Fund \(ERAF\)](#) reimburses small and mid-sized employers for costs associated with workplace accommodations for individuals with disabilities, including those impacted by long COVID. Despite these efforts to identify and support workers with long COVID, accurately identifying long COVID cases within workers' compensation claims remains difficult due to inconsistent reporting and diagnostic challenges.

[Long COVID](#) is a multifaceted condition with more than 200 documented symptoms affecting all 12 organ systems. Common symptoms include fatigue, cognitive impairment ("brain fog"), shortness of breath, autonomic nervous system disorders and gastrointestinal complications. The variability of symptoms and limited reliable data make diagnosis and management challenging for health care providers and employers. As the number of affected individuals grows, understanding long COVID's implications for workforce health and compensation systems is critical.

**Figure 1. Denial rate of COVID-19 claims and non-COVID-19 claims in Minnesota by year of illness, 2020-2023 T**

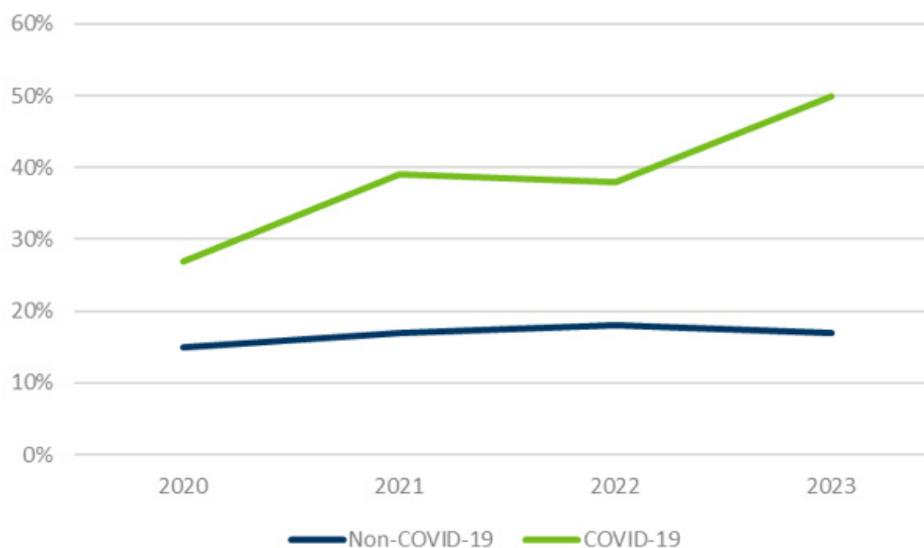
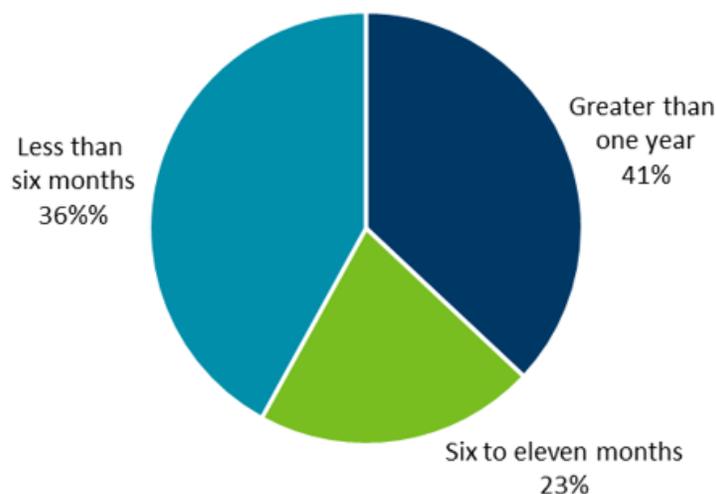


Figure 1 illustrates the difference in denial rates of COVID-19 claims versus non-COVID-19 claims from 2020 through 2023, with consistently higher denial rates in COVID-19 claims. More recent years' data involving non-COVID-19 claims are considered immature because of reporting lags in which claims often take months or years to finalize, especially when disputes or appeals occur. Also, longer claim durations involve extended recovery or complications (for example, long COVID) remain open longer, delaying final outcomes. Because COVID-19 claims are relatively new and do not align with traditional injury patterns, claims costs and duration cannot accurately be developed.

**Figure 2. COVID-19 workers' compensation paid claims in Minnesota by duration of claim, 2020-2025 (n=4,313)**



Claim duration was calculated as the time between the injury date and the claim closure date. When the injury date was recorded significantly later than the actual event, the claim creation date was used instead to more accurately reflect the length of COVID-19 illnesses. Claim injury, creation and closure dates are essential for determining benefit eligibility and payment duration, and for identifying claims that may involve extended recovery periods or complications such as long COVID.

Figure 2 illustrates trends of paid COVID-19 workers' compensation claims in Minnesota from 2020 through 2025, focusing on claim duration by month as a proxy for identifying potential long COVID cases. With 64% of claims lasting six months or longer signals possible long-term exposure to employers and insurers, as prolonged claims often correlate with higher costs and complex medical conditions.

There are inherent challenges with time variables reported to DLI. There are reporting inconsistencies across paid claims, which introduce data gaps and inaccuracies. The delays between the injury date and claim creation date can distort duration estimates, especially for cases involving appeals or late filings. Claims can also remain open unnecessarily or contain incomplete data making it difficult to calculate duration. The workers' compensation claims reporting system does not always reflect the actual length of illness, as administrative factors (for example, litigation, payment disputes) can extend claim timelines beyond medical recovery.

Accurate measurement of claim duration is critical for the identification of potential long COVID cases, forecasting costs for insurers and employers, and informing workplace health and safety strategies. The variability and immaturity of time-based data not only make predictive modeling and trend analysis challenging but require the data-mining of attached files associated with the claim to determine length of the illness.

The COVID-19 pandemic reshaped workers' compensation systems, introducing new challenges in claim management and disability accommodation. As long COVID continues to affect workers, employers and insurers, Minnesota and other states must adapt policies, improve data collection and develop strategies to manage long-term impacts. Understanding claim duration trends and financial implications is essential for creating sustainable solutions for employers, insurers and employees alike.

## Minnesota workplace injury, illness rate in 2024 holds steady at all-time low

Minnesota's estimated workplace injury and illness rate for 2024 was unchanged from that of 2023. According to the annual Survey of Occupational Injuries and Illnesses, Minnesota had an estimated 2.9 OSHA-recordable nonfatal workplace injuries and illnesses per 100 full-time-equivalent (FTE) workers in 2024; the estimated rate for 2023 was the same. This is the lowest rate recorded since the measurement started in 1973.

The survey estimated Minnesota had 66,000 workers with OSHA-recordable nonfatal workplace injuries and illnesses in 2024, compared to 65,100 estimated cases for 2023. Injuries accounted for 62,600 (95%) total recordable cases in 2024; illnesses were an additional 3,400 cases. In 2023, there were 5,200 illnesses.

In 2024, Minnesota's employment covered by the survey was approximately 2.89 million workers. In 2023, employment covered by the survey was 2.85 million workers.

"Daily attention to workplace safety and health directly improves the safety and health outcomes for workers, reduces preventable work-related injuries and illnesses, and ensures more workers go home safe and healthy at the end of each work shift," said Department of Labor and Industry (DLI) Commissioner Nicole Blissenbach.

The U.S. Bureau of Labor Statistics (BLS) estimates a national total of 3.1 million nonfatal workplace injuries and illnesses in private- and public-sector workplaces for 2024, resulting in a rate of 2.6 cases per 100 FTE workers.

### Other results from the Minnesota survey

The industries with the highest total injury and illness rate were state government hospitals (13.3 cases per 100 FTE workers), local government nursing care facilities (10.8), private industry beverage and tobacco product manufacturing (8.2), and private industry couriers and messengers (8.2).

Of the estimated 66,000 total recordable cases, 34,300 involved days away from work, job transfer or restriction (DART cases), at a rate of 1.5 cases per 100 FTE workers. An estimated 21,700 injured workers (63% of DART cases) had one or more days away from work after the day of injury, resulting in 1.0 cases per 100 FTE workers. In 2023, this rate was also 1.0.

An estimated 57,100 injury and illness cases were reported in the private sector, accounting for 87% of all recordable cases in 2024. Eighty-one percent of the estimated 8,800 injury and illness cases in the public sector were in local government.

Combined case and demographic data for 2023 and 2024 have been released. Additional statistics are available about the characteristics of the cases with days away from work and DART cases. Some highlights are shown below.

#### For workers with one of more days away from work:

- The median duration was six days.
- The most common types of injury and illness were sprains, strains and tears (29%), bruises and contusions (10%) and COVID-19 (9%). The "all other injuries and illnesses" category accounted for 29% of cases with days away from work.
- The most commonly injured body parts were upper extremities (27%), lower extremities (22%) and the trunk (21%).
- The most common injury events were overexertion, repetitive motion and bodily conditions (29%), contact incidents (24%) and falls, trips and slips (24%).
- The most common sources of injury and illness were ground, travel and support surfaces (19%), containers (13%) and person other than the injured or ill worker (11%). The "all other sources" category accounted for 23% of cases with days away from work.

- Occupation groups with the highest number of injuries and illnesses with days away from work included service (26%), transportation and material moving (20%), and production occupations (12%).
- Fifty-five percent of injured workers were male. Overexertion incidents were the leading cause of injury for both males and females.
- Fifty-two percent of injured workers were between the ages of 20 and 44. Workers age 55 and older accounted for 22% of cases, but had the longest time away from work, with a median of 11 to 12 days.

State agencies and BLS compile the survey data. This is the primary source of workplace injury and illness statistics at the state and national levels. DLI collects injury and illness records from randomly sampled Minnesota establishments in the private and public sectors (excluding federal agencies). Approximately 4,500 establishments provided usable responses for the 2024 survey.

DLI appreciates the thousands of employers that fulfilled their mandate to make the survey a success and enabled the publication of injury and illness rates.

- View the [Minnesota data tables](#) on the DLI website.
- View the [national data tables](#) on the BLS website.

## Subscribe to DLI's email newsletters

Did you know the Department of Labor and Industry offers more than two dozen email lists you can subscribe to to receive news targeted to specific groups? (If you are reading this, you are probably on the *COMPACT* email list.)

Lists related to workers' compensation news include:

- Adjusters updates
- *COMPACT*
- Employer updates
- Rehabilitation providers updates
- Attorney updates
- *Campus Connect*
- Medical providers updates
- Trading partner updates



Other email lists are available for:

- *Labor and Industry News*
- Construction codes, licensing and building trades
- Minnesota OSHA and workplace safety
- Apprenticeship, dual-training and Youth Skills Training
- Labor standards, worker rights, wage and hour
- Rulemaking

To learn more about the available email lists, visit [dli.mn.gov/about-department/news-and-media/sign-news-department-labor-and-industry](https://dli.mn.gov/about-department/news-and-media/sign-news-department-labor-and-industry).

## CompFact: Workers’ compensation claims, system cost continue long-term decline

Minnesota’s workers’ compensation total claim rate – the number of paid claims per 100 full-time-equivalent (FTE) workers – and total system cost per \$100 of payroll continued their long-term decline, reaching their lowest levels in 2024.<sup>1</sup>

Figure 1 shows the estimated workers’ compensation claim rates from 2004 through 2024. During this period:

- The indemnity claim rate fell by 32%, from 1.3 to 0.9 per 100 FTE workers.
- The medical-only claim rate fell by 45%, from 4.8 to 2.6.
- The total claim rate fell by 42%, from 6.1 to 3.5.

During the 20-year period, the total claim rate declined by an average of 2.6% a year. Claim rates from 2020 to 2022 were strongly affected by the COVID-19 pandemic. In 2024, the estimated indemnity claim rate fell slightly below its pre-pandemic level, with COVID-19 claims representing only 2% of indemnity claims. The medical-only claim rate in 2024 remained similar to its pandemic level. Overall, from 2019 to 2024, the medical-only claim rate fell by 15%, contributing to the decline in the total claim rate.

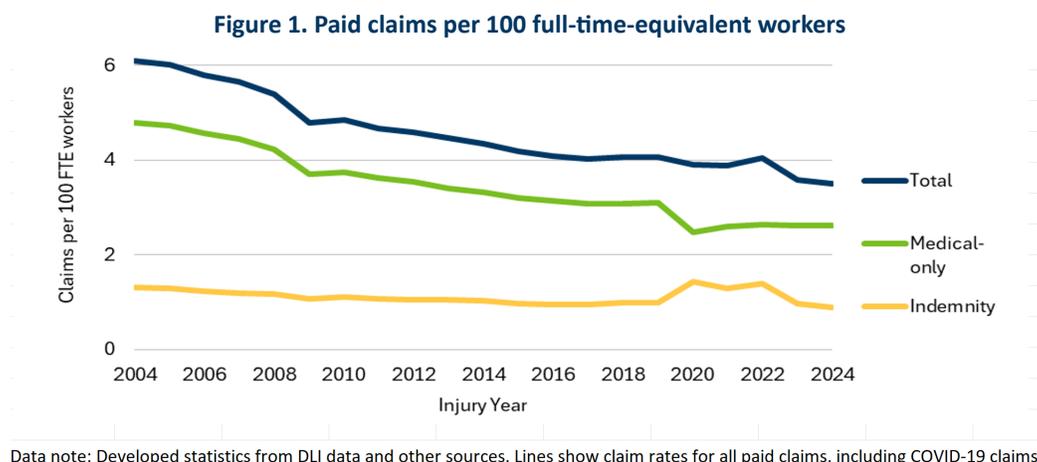
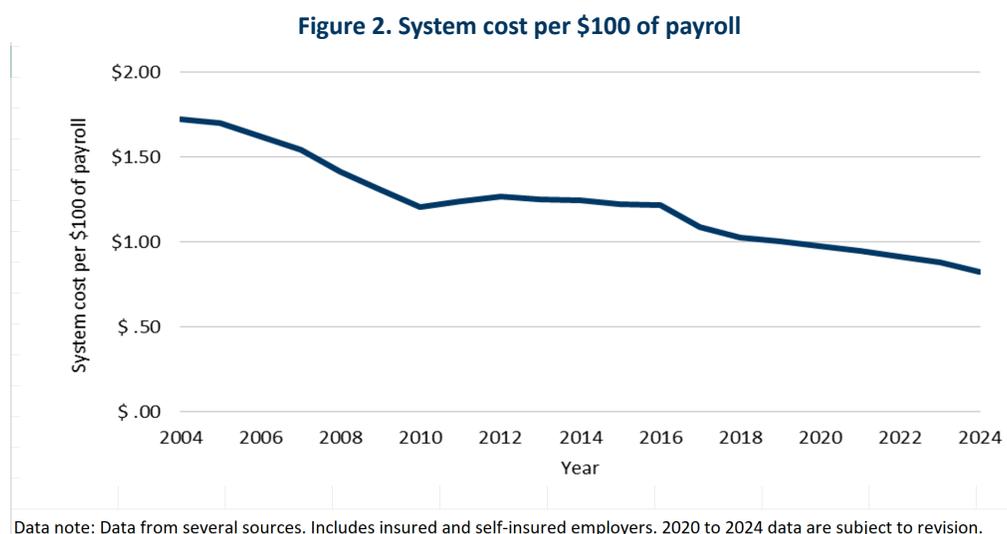


Figure 2 shows total workers’ compensation system cost per \$100 of covered payroll. In 2024, the estimated total cost of Minnesota’s workers’ compensation system was \$1.70 billion, or \$0.83 per \$100 of payroll. From 2004 through 2024, this cost declined from \$1.72 to \$0.83 per \$100 of payroll, reflecting a long-term downward trend averaging 3.1% annually.



<sup>1</sup>Minnesota’s estimated workplace injury and illness rate from the Survey of Occupational Injuries and Illnesses was also at an all-time low in 2024.

## Training opportunities: Orientation; provider update

### Registration to open soon for QRC intern, vendor, supervisor orientation

Registration will open soon for orientation and refresher training for qualified rehabilitation consultant (QRC) interns, vendors and supervisors.

- **When:** Monday, Aug. 10, 8 a.m. to 4:15 p.m.
- **Where:** Minnesota Room, Department of Labor and Industry, 443 Lafayette Road N., St. Paul MN
- **What:** This in-person orientation and refresher training is for QRC interns, QRC intern supervisors, newly registered job-placement vendors, rehabilitation providers re-entering the field, registered rehabilitation providers interested in refreshing their skills and rehabilitation administrative staff members who would like to learn more about the rehabilitation process.
- **Topics to be covered:** Workers' compensation 101; working as a rehabilitation provider; medical aspects; rehabilitation consultation and ethics; registration, renewal and completion of internship; and more.



QRC interns must complete this training within one year of starting their intern cycle. CRC and CDMS continuing education unit credits will be available for individuals participating in the training.

#### More information, registration

For more information, visit the "[WC training for rehabilitation providers](#)" webpage or contact Jordan Trumbo at 651-284-5153 or [jordan.trumbo@state.mn.us](mailto:jordan.trumbo@state.mn.us).

### Save the date for the DLI 2026 provider update

The next Rehabilitation Provider Update Conference has been scheduled as a virtual event Monday, Sept. 14, 2026.

Attendance and participation in the Rehabilitation Provider Update Conference session is required of all individuals who provide rehabilitation services to injured employees. Nonparticipation in the provider update may result in professional conduct and accountability discipline and may affect annual registration renewal with the Department of Labor and Industry.

#### More information, registration

Additional information about the conference regarding registration, agenda and available CEUs will be announced later and be available the "[Rehabilitation provider update conference](#)" webpage.

For more information, contact Jordan Trumbo at 651-284-5153 or [jordan.trumbo@state.mn.us](mailto:jordan.trumbo@state.mn.us).

## Workers' compensation events calendar

**Note:** Event dates may change. Always check the online calendar at [dli.mn.gov/about-department/about-dli/events-workers-compensation](https://dli.mn.gov/about-department/about-dli/events-workers-compensation).

### April 2026

<b>April 1</b>	<b>Workers' Compensation Insurers' Task Force</b>
<b>April 2</b>	<b>Rehabilitation Review Panel</b>
<b>April 8</b>	<b>Workers' Compensation Advisory Council</b>
<b>April 16</b>	<b>Medical Services Review Board</b>

### May 2026

<b>May 1</b>	<b>Training: OSHA recordkeeping basics</b>
<b>May 20</b>	<b>Workers' Compensation Insurers' Task Force</b>

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## Register today: Minnesota CLE Workers' Comp Institute, April 28 and 29

On Tuesday and Wednesday, April 28 and 29, join colleagues at the 2026 Workers' Compensation Institute for:

- Real-world guidance about important topics – selected and developed by Institute co-chairs from both sides of the aisle.
- Practice-oriented updates – translating legal developments into how to implement what's new.
- Diverse perspectives from experienced lawyers and judges – including Minnesota Supreme Court Associate Justice Karl C. Procaccini.
- Doctor-taught sessions – expanding your understanding of injuries at the heart of your cases.



**MINNESOTA CLE**  
*Your Success Is Our Goal*

Build a tailored agenda with focused breakouts, enjoy time reconnecting with the workers' compensation community and leave with concrete takeaways you can use right away.

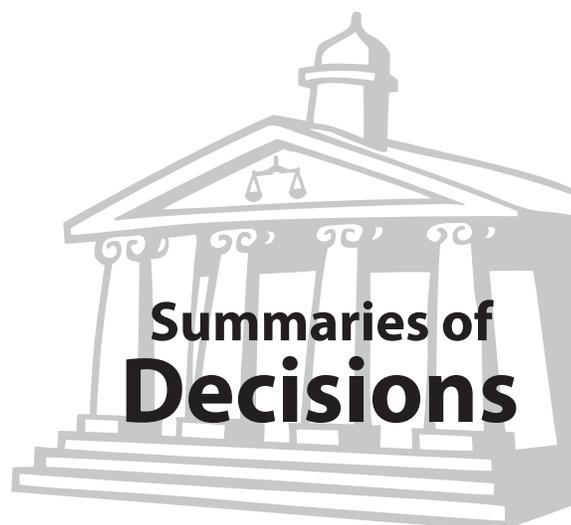
For more details and to register, visit [minncle.org/seminar/1051372601](https://minncle.org/seminar/1051372601).

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# Workers' Compensation Court of Appeals

November 2025 through January 2026

Case summaries published are  
those prepared by the WCCA



## ***Parker Stevens v. City of Fairmont, Nov. 12, 2025***

### **Attorney Fees Excess Fees**

This court cannot adequately review an award of excess fees in the absence of an analysis of the individual Irwin factors as required under the supreme court's decision in Jurgensen, therefore, the award must be vacated and the matter remanded for further consideration.

Vacated and remanded.

## ***Roderick Elzie v. University of Minnesota, Nov. 18, 2025***

### **Penalties Rules Construed – Minnesota Rules 5220.2760**

Where the employer unreasonably delayed payment and the employee brings a claim petition seeking penalties, Minnesota Rules 5220.2760 does not supplant the compensation judge's discretion in determining the appropriate amount of the penalty.

### **Penalties Statutes Construed – Minnesota Statutes § 176.255, Subdivision 1**

Where the employer unreasonably delayed payment of a settlement, the compensation judge's award of a penalty under Minnesota Statutes § 176.255, subdivision 1, is affirmed as supported by substantial evidence.

### **Penalties Rules Construed – Minn. R. 5220.2790**

The employer was not guilty of inexcusable delay by operation of Minn. R. 5220.2790, where the employer denied the initial claim and was not more than three days late in making payments of disability benefits three times within a 12-month period.

**Penalties****Statutes Construed – Minn. Stat. § 176.225, Subd. 5**

Substantial evidence supports the compensation judge's determination that the employer was not guilty of inexcusable delay in making payment from a settlement and the compensation judge's resultant denial of penalties under Minn. Stat. § 176.225, subd. 5, is affirmed.

Affirmed.

*Shawn Mack v. Menard, Inc., Nov. 26, 2025*

**Rehabilitation – Work Restrictions**  
**Rehabilitation – Substantial Evidence**

Substantial evidence in the record, including the credible testimony of the employee and the unopposed testimony of the qualified rehabilitation consultant, supports the compensation judge's determination that the employee continues to require restrictions on his work activities and the award of the recommended on-site job analysis to evaluate the accommodations necessary to return the employee to suitable work for the employer.

Affirmed.

*Risa Jenko v. Cleveland Cliffs, Jan. 26, 2026*

**Job Search**  
**Temporary Total Disability – Work Restrictions**

Where the compensation judge excused the employee's lack of job search but made no determination as to whether and when she was under work restrictions, and no determination as to whether she reasonably expected to return to work with the date of injury employer, the award of temporary total disability benefits must be vacated and the matter remanded for factual findings.

Affirmed in part, vacated in part and remanded for further findings.

*Rodney Dean Bjornson v. McNeilus Companies, Inc., Jan. 30, 2026*

**Appeals – Record**

The Workers' Compensation Court of Appeals considers only those exhibits formally submitted and accepted into evidence and those documents in the division file which are specifically identified at hearing by filing date, title and content, as part of the record on appeal.

**Attorney Fees – Roraff Fees**

The petitioner for attorney fees must provide an evidentiary basis for an ascertainable dollar value of medical benefits recovered on behalf of the employee in medical dispute claims for Roraff fees to be awarded under Minnesota Statutes § 176.081, subdivision 1(a)(1).

Reversed.

*Jaclyn Yzermans v. City of Shakopee Police Department, Jan. 30, 2026*

### **Rehabilitation – Eligibility**

Where an employee is working at a wage loss and cannot return to the date-of-injury occupation due to the effects of the work injury, the employee is qualified for vocational rehabilitation services, including services involving exploration of retraining.

Reversed.

# Minnesota Supreme Court

November 2025 through January 2026

Case summaries published are  
those prepared by the WCCA



## ***Daniel Krumsieg v. Bloomington Metro Mitsubishi, Nov. 7, 2025***

Considered and decided by the court without oral argument.

It is hereby ordered that the decision of the Workers' Compensation Court of Appeals filed Feb. 24, 2025, is affirmed without opinion. See Hoff v. Kempton, 317 N.W.2d 361, 366 (Minn. 1982) ("Summary affirmances have no precedential value because they do not commit the court to any particular point of view. They do no more than establish the law of the case.")

Affirmed without opinion.

## ***Joanne L. Hitchins v. Federal Express Corporation, Nov. 21, 2025***

Considered and decided by the court without oral argument.

It is hereby ordered that the decision of the Workers' Compensation Court of Appeals filed March 28, 2025, is affirmed without opinion. See Hoff v. Kempton, 317 N.W.2d 361, 366 (Minn. 1982) ("Summary affirmances have no precedential value because they do not commit the court to any particular point of view. The do no more than establish the law of the case.").

Affirmed without opinion.