



March 9, 2021

Commissioner Roslyn Robertson
Minnesota Department of Labor and Industry
443 Lafayette Road North
St. Paul, MN 55155
By email – Kate.Perushek@state.mn.us

Re: WCAC Consideration of Legislative Proposal, HF 1203 & SF 1203

Dear Commissioner Robertson and Members of the Workers' Compensation Advisory Council:

On behalf of the League of Minnesota Cities Insurance Trust (LMCIT), a self-insurance pool providing workers' compensation coverage to almost all cities and standalone police and fire departments in Minnesota, except for nine large self-insured cities including Minneapolis and St. Paul, I am writing to reiterate our position on the proposed extension to the COVID-19 presumption for law enforcement, firefighters, and other emergency personnel employed by Minnesota cities. We do not object to an extension in light of the ongoing pandemic and our experience to date. We do, however, offer two additional comments for your consideration.

First, we continue to believe that an incremental approach to the extension is appropriate. With this week's announcement of a greatly expanded vaccination program in Minnesota, our situation is likely to change significantly in coming days. A shorter extension would let all of us better adapt to facts as they become known and more accurately evaluate whether the financial implications of an extension warrant further discussion of state participation in bearing the costs.

Second, we continue to have underlying concerns about the use of presumptions in workers' compensation. We will not repeat our February 20, 2021 letter to you, other than to say it is critical that a larger policy discussion be had with all interested stakeholders before additional presumptions are added to the system.

LMCIT and our members share a commitment to keeping our public safety colleagues healthy and safe and we invest considerable resources in providing safety and risk management tools and training. The consequences to a city of an injury to one of these employees go well beyond the mere cost of a workers' compensation claim – they include staffing challenges, community safety, departmental morale, the ability to provide other public services, and a host of other policy considerations.

Commissioner Roslyn Robertson

March 9, 2021

Page 2

There is great value in this Council's ability to provide a well-informed and thoughtful forum to discuss these sorts of issues. We will be happy to engage in a conversation about the effects of presumptions and to provide any information that would help ensure sensible and sustainable outcomes.

Please let me know if you have questions or need additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "Daniel J. Greensweig". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Daniel J. Greensweig

Administrator

League of Minnesota Cities Insurance Trust