

MONTANA SELF INSURERS' ASSOCIATION

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January 19, 2022

Montana Department of Labor & Industry
Employment Relations Division
ATT: Q. O'Connor
P.O. Box 8011
Helena, Montana 59604

RE: Proposed Rules Amendments to Implement SB 367 (2021)

Dear Mr. O'Connor:

The Montana Self Insurers' Association appreciates the work the Employment Relations Division of the Department of Labor and Industry has done to craft the proposed changes to ARM 24.11.2407, 24.35.203 and the adoption of New Rule I, to implement the independent contractors law change as a result of the enactment of SB 367 (2021). We also appreciate your taking the time to review the new law from your perspective and help us understand your approach.

As a result of your assistance, we are withdrawing our concerns regarding the originally drafted proposed rules changes. We have a better understanding of why the language was drafted in the manner it is and what drove your decisions in the drafting. Thank you for working with us. We support the proposed rules as originally drafted and do not need to request you consider changes at this time.

With a copy of this letter, we are sharing with the EAIC and the original bill sponsor, Senator Morigeau, of the change in our position as well. Again, thank you for your willingness to work with us to help us understand the basis for the rules as you have drafted them.

Sincerely



Peter Strauss, Executive Director
Montana Self Insurers' Association

cc: Hon. S. Morigeau
Hon. K. Bogner, Chair EAIC
Hon. D. Harvey, V. Chair EAIC
Hon. J Ellsworth

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