



January 25, 2022

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 2656

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 express 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 a limited extension in light of the ongoing pandemic and the incidence of breakthrough cases.

We do, however, continue to have underlying concerns about the use of presumptions in workers' compensation. We will not repeat our February 23, 2021 letter to the Workers' Compensation Advisory Council, 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.

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".

Daniel J. Greensweig
Administrator
League of Minnesota Cities Insurance Trust