

April 25, 2018

Senator Gordon Vance
Chairman, Montana
Economic Affairs Interim Committee
P.O. Box 1
Belgrade, Montana 59714-0001

By PDF to Committee staff

Re: SJR 27—EAIC Workers' Compensation Study

Dear Chairman Vance:

A study now being conducted by the Montana Economic Affairs Interim Committee (EAIC) holds the potential to improve the workers compensation insurance market in Montana to a great extent and for years to come. As I understand it, EAIC is considering three options:

- 1) maintain the current 3 plan system in which Montana State Fund, a quasi-state agency, which holds an effective monopoly of the insurance market by controlling about 66% of Plan 2 and Plan 3 premium written;
- 2) further privatize the workers' compensation insurance market by dissolving the State Fund and installing an alternative market plan; or
- 3) a hybrid system allowing the State Fund to remain in the market in some altered way such as converting MSF to a Plan 2 mutual insurance company.

As owner and President of Midland Claims Service, Inc. and Industrial Injury Claims®, a firm that provides workers' compensation claims services only in the state of Montana, and having spent nearly 15 years of my 44 year insurance / claims career in the California marketplace responsible for claims in 35 states, I am professionally very familiar with this discussion and with how it has taken place elsewhere in the United States. My firm has been responsible for 30,816 Montana workers' compensation claims representing over \$132,200,000 in incurred losses for businesses (insured and self-insured) covering a range of occupations including healthcare, underground mining, restaurants, bars, oil field service, long haul trucking and general contracting.

I recommend your consideration of elimination of the now outmoded concept of State Fund and implementation of true privatization of the workers' compensation market in Montana similar to the steps taken by 22 other states. Many of those 22 states that have implemented the NCCI Residual Market Service have enjoyed significant premium reductions for their states' businesses. I have attached to this letter my resume outlining my expertise in this area and my commitment to the modernization of the Montana workers' compensation market. I am confident that you will see my dedication to the Montana market. Not only do I own a workers' compensation claims administration company, I am also a board member of Kids' Chance of Montana and serve as the acting Chairman of WorkSafeMT. The motive to offer my opinion is simple; to improve the workers' compensation system in Montana for the current and future generations.

The reasons are below for my recommendation that Montana modernize its market by moving away from the aged state fund concept and moving with many other states toward

privatization.

Montana's workers' compensation premium rates are high, making Montana less than competitive than surrounding states. From 2007 to 2014 there has been some relative improvement in our ranking relative to other states. Montana is now only the 11th most expensive state in the US, an improvement from the second most expensive in 2008 (Oregon Workers' Compensation Premium Rate Ranking Summary). However, when viewed in context of our neighbors, who compete against Montana for businesses and employees, we are significantly out of step. From the Oregon WC Premium Study:

State	Ranking	% of Median Rate	Index Rate
MT	11	114%	2.10
WY	23	101%	1.87
ID	28	97%	1.79
SD	32	91%	1.67
ND	51	48%	.89

What drives such significant cost differences between Montana and its neighbors?

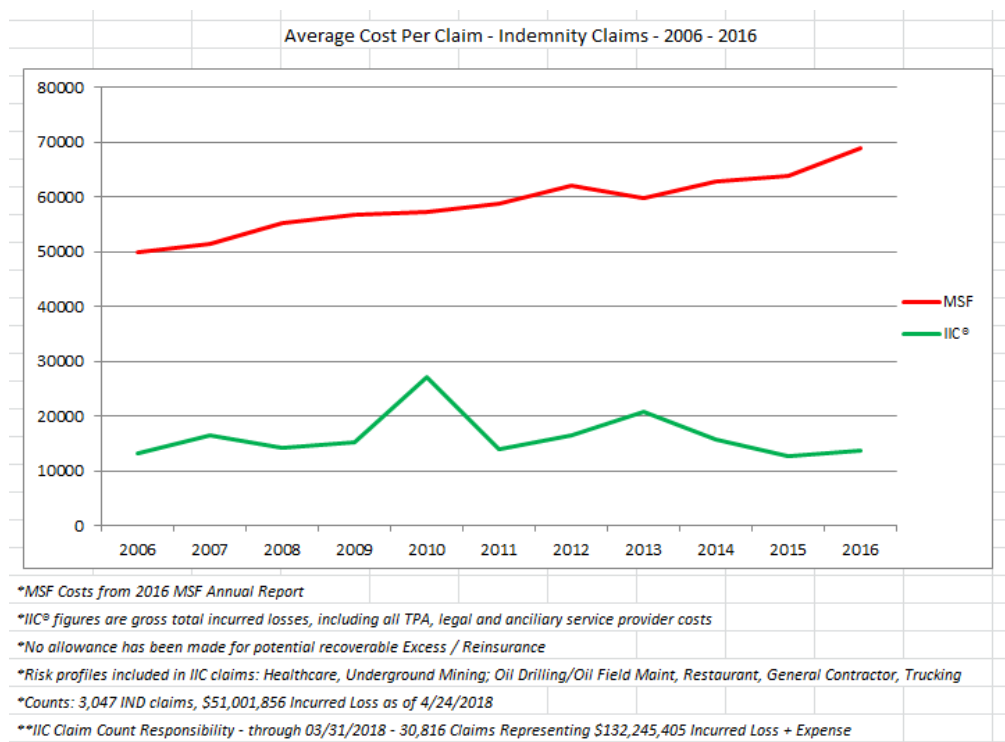
First, the laws in place in each state vary widely, coverages vary, benefit levels vary and the types of risk financing (self-insurance, free market insurance purchase, monopolistic) vary. It has been my experience however that these differences are insubstantial factors when comparing jurisdictions. Certainly, business owners are moved by how much they have to pay for their insurance if they are not large enough to self-insure. The above table demonstrates that Montana is simply much more expensive than our neighbors. Jurisdictional differences explain a small part of the situation.

Secondly, market efficiency (or the perception of the market) in workers' compensation is particularly important. In Montana, our insurance market is so small compared to other states that its size has been referred to as a "rounding error". Total premium is not an attraction for insurance companies for Montana. Size matters for efficiency. Montana has a limited upside for an insurance organization writing business, and when providing claim services in the state they are confronted with a huge physical territory. Montana has a similar number of residents and businesses to Sacramento County California. An insurance company deploying capital to take risk in an area looks at each jurisdiction to decide the most efficient use of their capital. Sacramento County has over 1,400 residents per square mile, Montana around 6 people per square mile. The Montana jurisdiction is less insurer friendly than many. We have only a single WC judge, privately appointed by the Governor. We have a liberal leaning Supreme Court. Montana requires that the Examiner responsible for claims be located in state. And our Constitution is strongly in favor of the individual. These factors all make Montana an outlier compared to other states. Companies then evaluate the competitive landscape. Montana's workers' compensation insurance market is dominated by the Montana State Fund. As a quasi-state agency, they hold competitive advantages that private insurers cannot obtain. MSF does not have to pay commission to agents (those with less than \$300,000 in annual written premium are typically not appointed individually and do not receive commissions) and they cannot be sued for bad faith claim handling punitive damages. These two items alone can make up to a 15% differential in the cost of providing the coverage...before even the first claim takes place. MSF is not limited

to writing 'last resort' workers' compensation insurance. It also actively competes for non-distressed business with its market advantages. In summary, the current environment in Montana is not conducive to attracting carriers to participate in the workers' compensation insurance market.

Lastly, workers' compensation premium rates are primarily derived as a factor of loss costs. Where loss costs are high, rates tend to be high. Where loss costs tend to fall, rates tend to fall. In a state where the Plan 2 and Plan 3 insurance written is dominated by one organization, the statistics of that state will tend to be weighted towards the reported experience of that entity. This is the case in Montana. Montana State Fund has a near monopoly for workers' compensation insurance in the state with over 65% of written premium in their control. A great majority of the NCCI loss cost data is created with heavy weighting on Montana State Fund because of their market size. This is part of the reason that Montana ranks poorly among comparison states.

The purpose of this paper is not to determine why. It is simply put forth to lay out the facts. In this relatively small state, again, about the size of Sacramento County, weighting of the loss costs can significantly distort the premium rate comparisons, and therefore the perception of our state by those looking to write insurance or locate their business in Montana. Our system is not broken. Major legislation is not needed, in my opinion. The following graph, similar to that shown in testimony in a variety of private and legislative settings in prior years, compares the average cost of Indemnity claims (those with lost work time and/or permanent impairment) for claims handled by my company to the results published by Montana State Fund. The purpose of the graph is to show that in our small state, where we share many of the same occupations, treating doctors and hospitals, there is a significant difference in loss costs in our state.



Implementation of a fully privatized workers' compensation system will allow more true competition in the Montana market. Increased competition will lead to benefit delivery efficiencies. Such efficiencies, like in other states that have discontinued the concept of governmental-associated state funds in favor of the NCCI Residual Market Service, will lead to significant loss cost reductions and, therefore, premium decreases. Premium decreases of significance will lead to the more positive perception of Montana, making us more competitive with other states, attracting more businesses, employers and high paying jobs.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael J. Marsh".

Michael J. Marsh, RPA, CPIA
President
Midland Claims Service, Inc.
Industrial Injury Claims®
PO Box 20151
Billings, MT 59104-0151
(406) 656-9960



Michael J. Marsh



Montana
Adjusters License # 901239
Producer License # 5084123
Certified WC Examiner #01012010001

Mr. Marsh is currently the President of both Underwriting Solutions, Inc. (USi) and Midland Claims Service, Inc. / Industrial Injury Claims®, Montana corporations. He has a diverse insurance and technology skill set and is a licensed Adjuster, WC Examiner and Agent/Producer in Montana. He holds the Registered Professional Adjuster and Certified Professional Insurance Agent designations.

Midland Claims Service, Inc., and its wholly owned subsidiary Industrial Injury Claims®, is a leading provider of third party workers' compensation claims administration service to insured and self-insured organizations doing business in the state of Montana. The company's clients employ over 15,000 employees in Montana working in the healthcare, long term care, mineral extraction, oil, underground mining, long haul trucking, construction and food service industries. Utilizing secure and efficient cloud computer data processing systems, team-based business management and best practices garnered over four decades in the claims industry, Mr. Marsh has reenergized the company since his return to Billings from California in 1999 and led the company through a period of significant growth. From deployment of internally developed, actuarially sound financial reporting to extensive medical and litigation management, the company's clients have enjoyed significant reductions in total expenditures and average cost per case during a time of challenge in the Montana workers' compensation system. Since 2001, MCSi has been responsible more than 32,000 WC claims, over 25% of all self-insured (Plan 1) claims filed in the state of Montana, in addition to providing property/casualty claims service to the insurance industry. Mr. Marsh has served as an expert witness in claim-related UTPA / bad faith litigation actions. One of the highlights of Michael's claims career came in 2016. At the Big Sky Governor's Conference, he was awarded the Montana Governor's Achievement Award for Outstanding Workers' Compensation Professional, the first such award given in the 100+ year history of Montana workers' compensation. 2018 brought another highlight, as Mr. Marsh and Midland Claims were awarded the Employer of the Year award by the Billings Chamber of Commerce.

Mr. Marsh was a founding member (2004) of Claims Professional Liability Insurance Company, a national risk retention group providing professional and general liability insurance to nearly 400 independent claim service companies in all 50 states. Michael was the author of the company's policy contracts and forms, assisted with creation of the rating and underwriting plans, and continues to serve on the Policy Contract, Risk Management and Customer Experience committees of CPLIC. Michael served as the Western Region Vice President of the National Association of Independent Insurance Adjusters (www.naiia.com) in the years 2016 – 2018.

Michael provided consulting services to Ensera, Inc. (acquired by Mitchell International) and IAnet, Inc., internet-based automation companies serving the automobile insurance industry. He was the creator of the technology architecture to automate auto claims processing (patent pending). Michael was the lead implementation consultant for the startup of Esurance Inc. (www.esurance.com) in 1999 - 2000, a pioneering company offering automobile insurance exclusively over the Internet. He served as VP of Insurance Management Group West, CA from 1996 through 1998. Michael was the exclusive claims consultant for the California Earthquake Authority (www.earthquakeauthority.com), creating



Midland Claims Service, Inc.

P.O. BOX 20151

BILLINGS, MONTANA 59104-0151

(406)656-9960 Fax (406)656-9983

www.midlandclaims.com



the CEA's claims processing procedures during its formation. He served as a private consultant to Sullivan & Sullivan General Agency, Sovereign General Agency, Automobile Club of Southern California and Western General Insurance Company. He has also worked as a software (beta) testing consultant for America On Line, Microsoft and Intuit/Quick Books.

Mr. Marsh served in 1994 through 1996 as the Vice President of Underwriting and Operations of Western Pioneer (Commerce West) Insurance Company, Pleasanton, CA, a leading writer of preferred private passenger automobile insurance. There he was responsible for the acquisition and implementation of automation systems, underwriting programs and procedures, customer and agency service and claims and support services. From 1992 through 1994, Mr. Marsh was the Vice President of Claims and Operations for Western Pioneer. During this time he was also the National President of the Policy Management Systems Corporation "POINT" User Group and was an industry leader in implementing a remote insurance underwriting/claims system in 1993.

From 1986 through 1992, Mr. Marsh was with National American Insurance Company of California, serving as its national Vice President of Claims. There he was responsible for home office and branch claims operations for the United States for the \$75 Million book of Workers' Compensation, Commercial and Personal Lines business in the 11 western states. Claims included runoff business from Stuyvesant and Mission American Insurance Companies, where he handled or directed in excess of \$1 Billion of liability and property claim exposures in all 50 states ranging from landslide and construction defects claims to ground water property (SuperFund) and bodily injury pollution claims. He was instrumental in the design, programming, testing and live roll-out of the NAICC "PAL" main frame insurance processing computer system.

Michael is a graduate of Billings West High School (1976), a member of the National Honor Society and several music performing groups. He received five years of secondary education, with concurrent majors in Architecture and Business Management, at Montana State University – Bozeman. Mr. Marsh, a strong proponent of continuing education, has attended over one hundred educational seminars and classes; topics ranging from business management, insurance underwriting, claims, litigation management, personnel supervision and computer web site and SQL query/report programming. He in fact was the author of the law passed in Montana to allow for certification of Workers' Compensation Examiners and Continuing Education, and continues to provide CE training on a regular basis.

Other Interesting Historical Items

Instructor/Provider – Insurance/Claims Continuing Education – Montana Department of Insurance – current

President – Affiliated Adjusters, Inc. (www.affiliatedadjusters.com) 2007 – 2009; Board Member – 2004 - present

President/Board Member – Billings Motorcycle Club (www.billingsmotorcycleclub.us) 2005 – 2008 term; also responsible for safety / risk management and community relations development; received the organization's Outstanding Member Award in 2007; Billings Chamber of Commerce's Tourism Excellence award winner 2007

President/Owner – Recreational Action Sports Entertainment (www.ridethebigsky.com) 2003 – present; motorsports-oriented event and travel promotion company; Billings Chamber Tourism Excellence award 2008

President/Owner – Underwriting Solutions, Inc. (www.usimga.com) 2000 – present – Ind. Insurance Agency

Sponsor and Co-Chair – American Heart Association Heart Ball – 2004

Participant – Labor / Management Advisory Council on Workers' Compensation (Montana); author of legislative change (2009) for certification and CE requirements for WC claims handlers; WCRI state Workers' Compensation inventory study participant

Chairman & Board Member – WorkSafeMT, a non-profit Montana organization established in 2008 as a result of the Governor's Labor / Management Advisory Council on Workers'



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(406)656-9960 Fax (406)656-9983

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Compensation, to promote workplace safety to businesses/workers in Montana;
member of the Return To Work, Exec, and Finance Oversight Committees

Kids' Chance of Montana – Founding Board Member for organization providing educational support / scholarships to children of injured and deceased Montana workers

Member of the Montana State University (Bozeman) Lifetime Alumni, Quarterback Club (football) and Sideout Club (volleyball).

Business Partner – Montana Department of Labor and Industry, Employment Relations Division; worked with ERD in design and implementation stages of electronic data interface system to allow direct FTP WC data reporting and change to SROI reporting resulting in much improved data submission volume and accuracy received by ERD (and subsequently reported to the legislature); served in consulting capacity for study and implementation of Utilization and Treatment Guidelines and as member of the Prescription Drug Formulary Committee (implementation of an Rx formulary projected @ 2019)

Member – Billings Chamber of Commerce 2006 – present (3 companies and BMC), and member of the CVB and Education committees

Member – National Association of Independent Insurance Adjusters – Approx 1965 – Western Region Vice President 2016 - 2018

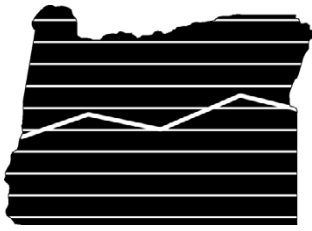
Approved Claim Services Provider: Property/Casualty – State of Montana – Risk Management Division;
Workers' Compensation Excess and consulting projects – Safety National Casualty Corporation, AIG, Genesis (GenRe), ACE/Chubb, Old Republic Insurance Company

Member – Society of Registered Professional Adjusters; # 730 – Year 2000 – Current

President – Orange County (CA) Claims Managers Council 1989 – 1990

Member – Pacific Claim Executives Association 1989 – 1996, 2018 - Current, Primary Event Organizer Oct 1996





2016 Oregon Workers' Compensation Premium Rate Ranking Summary

Department of Consumer and Business Services

October 2016

By [Chris Day](#), [Mike Manley](#), and [Jay Dotter](#)

Oregon employers in the voluntary market pay, on average, the seventh lowest workers' compensation premium rates in the nation. Oregon's rates are 31 percent below those of the median state in the study.

Premium rate indices are calculated based on data from 51 jurisdictions, for rates in effect as of Jan. 1, 2016. The 2016 median value is \$1.84, which is a drop of less than 1 percent from the \$1.85 median of the 2014 study. Oregon's premium rate index is \$1.28 per \$100 of payroll, or 69 percent of the national median. National premium rate indices range from a low of \$0.89 in North Dakota, to a high of \$3.24 in California. There were 21 states that had an index rate that was within plus or minus 10 percent of this benchmark value. In the upper part of the rate distribution, 12 states had index rates higher than 110 percent of the median, while 18 states were below 90 percent of the median. For an interactive map of the state rankings, [click here](#).

Figure 1. 2016 Workers' compensation premium index rates

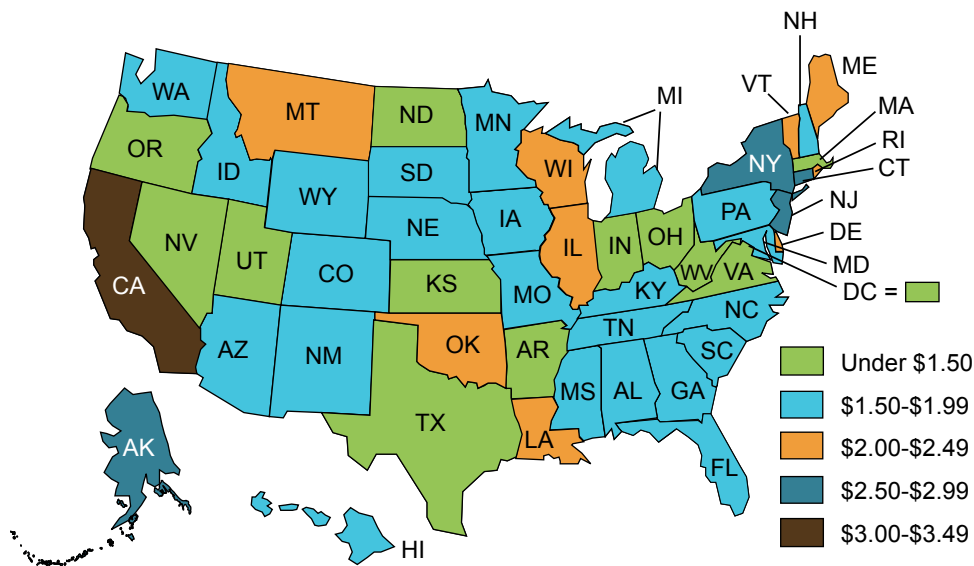


Table 1. Oregon's ranking in the top 10 classifications

Occupation	Ranking
Clerical office employees	46
Salespersons - outside	49
College: professional employees and clerical	41
Physician and clerical	34
Restaurant	43
Hospital: professional employees	45
Store: retail	48
Automobile service/repair center and drivers	29
Trucking: all employees and drivers	39
Retirement living centers: health care employees	34

The study is based on methods that put states' workers' compensation rates on a comparable basis, using a constant set of risk classifications for each state. This study used classification codes from the National Council on Compensation Insurance (NCCI). Of approximately 450 active classes in Oregon, 50 were selected based on relative importance as measured by share of losses in Oregon. To control for differences in industry distributions, each state's rates were weighted by 2010-2012 Oregon payroll to obtain an average manual rate for that state. Listed in Table 1 are Oregon's rankings in the top 10 (by payroll) of the 50 classifications used.

Table 2. Workers' compensation premium rate ranking

2016 Ranking	2014 Ranking	State	Index Rate	Percent of study median	Effective Date	Percent of 2014 study median
1	1	California	3.24	176%	January 1, 2016	188%
2	3	New Jersey	2.92	158%	January 1, 2016	152%
3	4	New York	2.83	154%	October 1, 2015	148%
5	2	Connecticut	2.74	149%	January 1, 2016	155%
5	5	Alaska	2.74	149%	January 1, 2016	145%
6	9	Delaware	2.32	126%	December 1, 2015	125%
8	6	Oklahoma	2.23	121%	January 1, 2016	137%
8	7	Illinois	2.23	121%	January 1, 2015	127%
9	20	Rhode Island	2.20	119%	August 1, 2014	107%
10	10	Louisiana	2.11	115%	January 1, 2016	120%
11	11	Montana	2.10	114%	July 1, 2015	119%
12	23	Wisconsin	2.06	112%	October 1, 2015	104%
14	8	Vermont	2.02	110%	April 1, 2015	125%
14	13	Maine	2.02	110%	April 1, 2015	116%
15	17	Washington	1.97	107%	January 1, 2016	108%
17	27	Hawaii	1.96	107%	January 1, 2016	100%
17	12	New Hampshire	1.96	106%	January 1, 2016	118%
18	17	South Carolina	1.94	105%	September 1, 2015	108%
20	21	Missouri	1.92	104%	January 1, 2016	107%
20	20	New Mexico	1.92	104%	January 1, 2016	108%
22	20	Minnesota	1.91	104%	January 1, 2016	107%
22	27	North Carolina	1.91	103%	April 1, 2015	100%
23	31	Wyoming	1.87	101%	January 1, 2016	95%
24	24	Iowa	1.86	101%	January 1, 2016	101%
25	29	Alabama	1.85	100%	March 1, 2015	97%
26	17	Pennsylvania	1.84	100%	April 1, 2015	108%
27	32	Georgia	1.80	98%	March 1, 2015	95%
28	14	Idaho	1.79	97%	January 1, 2016	109%
29	38	Mississippi	1.70	92%	March 1, 2015	85%
30	22	Tennessee	1.68	91%	March 1, 2015	105%
32	30	Nebraska	1.67	91%	February 1, 2015	96%
32	25	South Dakota	1.67	91%	July 1, 2015	100%
33	28	Florida	1.66	90%	January 1, 2016	98%
34	34	Michigan	1.57	85%	January 1, 2015	91%
35	41	Colorado	1.56	84%	January 1, 2016	81%
36	40	Kentucky	1.52	82%	October 1, 2015	82%
38	37	Arizona	1.50	82%	January 1, 2016	86%
38	35	Maryland	1.50	82%	January 1, 2016	88%
40	36	Texas	1.45	79%	July 1, 2015	87%
40	33	Ohio	1.45	79%	July 1, 2015	94%
41	39	Kansas	1.41	77%	January 1, 2016	83%
42	45	District of Columbia	1.37	74%	November 1, 2015	70%
43	46	Nevada	1.31	71%	March 1, 2015	68%
44	48	Massachusetts	1.29	70%	April 1, 2014	63%
45	43	OREGON	1.28	69%	January 1, 2016	74%
46	45	Utah	1.27	69%	December 1, 2015	71%
47	48	Virginia	1.24	67%	April 1, 2015	63%
48	43	West Virginia	1.22	66%	November 1, 2015	74%
49	49	Arkansas	1.06	57%	July 1, 2015	58%
50	50	Indiana	1.05	57%	January 1, 2016	57%
51	51	North Dakota	0.89	48%	July 1, 2015	47%

Notes: Starting with the 2008 study, when two or more states' Index Rate values are the same, they are assigned the same ranking. The index rates reflect adjustments for the characteristics of each individual state's residual market. Rates vary by classification and insurer in each state. Actual cost to an employer can be adjusted by the employer's experience rating, premium discount, retrospective rating, and dividends. [Link to previous reports and summaries.](#)

Employers can reduce their workers' compensation rates through accident prevention, safety training, and by helping injured workers return to work quickly.

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Residual Market Administrators

STATE	ADMINISTRATIVE ORGANIZATION	STATE FUND REINS. MECH.
Alabama	NCCI 800-NCCI-123	None NWCRA
Alaska	NCCI 800-NCCI-123	None NWCRA
Arizona	NCCI 800-NCCI-123	Competitive NWCRA
Arkansas	Application Information NCCI 800-NCCI-123 Other Plan Information NCCI—Arkansas Service Center 501-753-5180	None NWCRA
California	State Comp. Ins. Fund 415-565-1234 877-405-4545 www.scif.com	Competitive None
Colorado	Pinnacol Assurance 303-361-4000 800-873-7242 www.pinnacol.com	Competitive None
Connecticut	NCCI 800-NCCI-123	None NWCRA
Delaware	Delaware Comp. Rating Bureau 302-654-1435 www.dcrb.com	None NWCRA
District of Columbia	NCCI 800-NCCI-123	None NWCRA
Florida	Florida Workers Comp. Joint Underwriting Association, Inc. 941-378-7400 www.fwcjua.com	None None
Georgia	NCCI	None

	800-NCCI-123	NWCRA
Hawaii	Hawaii Employers Mutual Insurance Co. (HEMIC) 808-524-3642 www.hemic.com	Competitive None
Idaho	NCCI 800-NCCI-123	Competitive NWCRA
Illinois	NCCI 800-NCCI-123	None NWCRA
Indiana	Indiana Comp. Rating Bureau 317-842-2800 www.icrb.net	None IN AR Pool/CIS 601-977-9456
Iowa	NCCI 800-NCCI-123	None NWCRA
Kansas	NCCI 800-NCCI-123	None NWCRA
Kentucky	Kentucky Employers' Mutual Insurance 800-640-5364 www.kemi.com	Competitive None
Louisiana	Louisiana Workers Comp. Corp. 225-924-7788 www.lwcc.com	Competitive None
Maine	Maine Employers Mutual Insurance Co. 800-660-1306 www.memic.com	Competitive None
Maryland	Chesapeake Employers' Insurance Company 410-494-2000 800-264-4943 www.ceiwc.com	Competitive None
Massachusetts	The Workers' Comp. Rating and Inspection Bureau of Mass. 617-439-9030 www.wcribma.org	None MA Pool
Michigan	Comp. Advisory Organization of Michigan 734-462-9600	None MI WC Placement

	www.caom.com	Facility
Minnesota	Minnesota Workers' Comp. Insurers' Assoc. 952-897-1737 www.mwcia.org	None MN AR Pool
Mississippi	NCCI 800-NCCI-123	None MS AR Pool/CIS 601-977-9456
Missouri	Travelers Insurance Co. 800-842-9346 www.travelers.com	None Alternative
Montana	State Comp. Ins. Fund 406-444-6500 800-332-6102 www.montanastatefund.com	Competitive None
Nebraska	Travelers Insurance Co. 800-842-9346 www.travelers.com	None Alternative
Nevada	NCCI 800-NCCI-123	None NWCRA
New Hampshire	NCCI 800-NCCI-123	None NWCRA
New Jersey	Comp. Rating & Inspect. Bureau 973-622-6014 www.njcrib.com	None NWCRA
New Mexico	NCCI—New Mexico Service Center 505-242-1330	Competitive NM AR Pool
New York	New York State Ins. Fund 212-312-9000 www.nysif.com	Competitive None
North Carolina	North Carolina Rate Bureau 919-783-9790 919-582-1056 www.ncrb.org	None NWCRA
North Dakota	North Dakota Workmen's Comp. Bureau 701-328-3800	Monopolistic None

	www.workforcesafety.com	
Ohio	Ohio Bureau of Workers' Compensation 614-644-6292 800-644-6292 www.ohiobwc.com	Monopolistic None
Oklahoma	CompSource Oklahoma 405-232-7663 800-347-3863 www.compsourceok.com	Competitive None
Oregon	NCCI 800-NCCI-123	Competitive NWCRA
Pennsylvania	State Workmen's Ins. Fund 570-963-4635 www.dli.state.pa.us	Competitive None
Rhode Island	The Beacon Mutual Ins. Co. 401-825-2667 401-462-8100 www.beaconmutual.com	Competitive None
South Carolina	NCCI 800-NCCI-123	None NWCRA
South Dakota	NCCI 800-NCCI-123	None NWCRA
Tennessee	NCCI 800-NCCI-123	None NWCRA
Texas	Texas Mutual Insurance Company 800-859-5995 512-322-3800 www.texasmutual.com	Competitive None
Utah	Workers Comp. Fund of Utah 801-288-8000 800-446-2667 www.wcfgroup.com	Competitive None
Vermont	NCCI 800-NCCI-123	None NWCRA
Virginia	NCCI	None

	800-NCCI-123	NWCRA
Washington	Washington State Department of Labor & Industries 360-902-5800 800-547-8367 www.lni.wa.gov Washington USL&H Assigned Risk Plan www.warp-uslh.org	Monopolistic None
West Virginia	NCCI 800-NCCI-123	None NWCRA
Wisconsin	Wisconsin Comp. Rating Bureau 262-796-4540 www.wcrb.org	None WI WC Insurance Pool
Wyoming	Wyoming Workers Safety & Compensation Division 307-777-7441 www.wydoe.state.wy.us	Monopolistic None

AR = Assigned Risk

NCCI = National Council on Compensation Insurance

NWCRA = National Workers Compensation Reinsurance Association

WC = Workers Compensation