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September 4, 2025

RE: Oregon Employment Department SB916 Draft Rulemaking

To whom it may concern,

The Springfield Area Chamber of Commerce has long supported a balanced unemployment insurance (UI) system that provides a safety net for workers while ensuring accountability and fairness for employers. Unfortunately, the Oregon Employment Department's (OED) draft rules to implement SB 916 go far beyond the Legislature's intent and risk undermining that balance.

Rather than limiting the scope of rulemaking to the new statutory requirements for unemployment benefits during strikes, OED has proposed sweeping changes that fundamentally rewrite UI law in Oregon. These draft rules shift the system away from its original purpose - a temporary safety net that encourages workers to re-enter the workforce - and toward a permanent workplace benefit at the expense of public and private employers.

Key concerns with the proposed rules include:

- Allowing claimants to create new restrictions on the type of work and schedule they are willing to accept, without justification.
- Eliminating the Director's authority to require claimants to accept suitable available work.
- Weakening the definition of "actively looking for work" in ways that conflict with the federal Social Security Act, including creating an unprecedented "employer-attached" category with no time-certain recall requirement, and interpreting striking as qualifying as an active work search.
- Treating remote work as an entitlement, allowing claimants to restrict searches only to remote positions regardless of availability in the labor market.
- Extending time limits around absences and illnesses in ways that blur distinctions between UI, Paid Leave Oregon, and sick time law.

These rules, as drafted, will extend the length of time claimants collect benefits, drive up costs for Oregon's UI system, and increase tax burdens on employers already facing economic pressures. More troubling, they come at a time when Oregon is experiencing rising unemployment, high housing costs, and increasing signs that businesses are choosing to invest and expand in other states.

We urge OED to return to the Legislature's intent in SB 916 and narrow the scope of its rulemaking accordingly.

Employers need a UI system that is predictable, sustainable, and aligned with federal law - not one that erodes accountability and discourages workforce participation.

The Springfield Chamber remains committed to working with policymakers to ensure that Oregon's unemployment insurance system continues to protect workers in times of genuine need while supporting, not hindering, the economic stability and competitiveness of our state.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. Mikkelsen'.

Vonnice Mikkelsen
President and CEO