

Draft talking points:

- OED's misguided rules transform the UI system into a default 6-month general benefit rather than encouraging workers to re-enter the workforce. This is alarming, given Oregon's rising unemployment rate.
- The draft rules employer claimants to refuse work or not to search for work that falls outside of preferred locations or schedules without requiring claimants to justify why they need such restrictions.
- Some provisions blur the lines between unemployment insurance, Paid Leave Oregon, and Oregon sick time. For example, there are references in the rules about injuries, illnesses and disabilities in a way that could be unrelated to the physical ability to work. Rules referencing injuries, illnesses and disabilities should acknowledge the requirements under the ADA, specifically reasonable accommodations.
- The proposed changes to the requirements that claimants actively look for work are alarming and a significant overreach by OED.
 - Claimants must actively be looking for a new job according to the Social Security Act.
 - The creation of an entirely new category of "employer attached" is a dramatic departure from how Oregon and other states have traditionally defined the temporary layoff requirements. There must be a time-certain for when workers are expected to be recalled to work *if* they are to be relieved of work search requirements.
 - Interpreting being on strike as qualifying as "actively looking for work" undermines both state and federal law. Our laws require claimants to be pursuing employment. This rule conveys there is no expectation that a striking worker engages in any activity designed to result in productive employment.
- The proposed change to OAR 471-030-0036(7), related to remote work, would devastate our economy. Employers are already struggling to convince workers to come to offices regularly. Many employers do offer hybrid schedules requiring employees to be in office 2-3 days a week and allowing remote work the other days of the week, but few provide 100% remote work. There simply are not as many remote jobs as there are workers who want remote work. If claimants are allowed to limit work searches to 100% remote positions, they will almost certainly be unemployed longer, holding out for a job that may not exist or may have far too many qualified applicants. This provision is an inappropriate use of agency power and should be eliminated from the final draft.

- Thank you for the opportunity to share my concerns with the direction that the OED is taking in this expansive rulemaking.