

March 29, 2019

Representatives Ivy Sponholz and Tiffany Zulkosky, Co-Chairs
House Health and Social Services Committee
State Capitol
Juneau, Alaska 99801

Dear Co-Chairs and Committee Members,

The AMLJIA is a joint insurance arrangement organized under AS 21.76. The AMLJIA administers a self-insurance program for 159 member municipalities and school districts pooling for workers' compensation coverage. These local government entities bear the single largest exposure to changes in workers' compensation law as it applies to employees such as firefighters, EMTs, paramedics and police.

House Bill 84, if passed, would expand the already generous cancer presumptions of AS 23.30.121(b) to include breast cancer to the list of covered cancers. According to the Centers for Disease Control and Prevention (CDC), breast cancer has the highest incidence rate for females of any type of cancer¹ in Alaska by far (122 per 100,000). We all know a woman or family that has been touched by this disease and they probably are not a police officer, EMT, paramedic or fire fighter. Simply put, breast cancer does not discriminate based upon your job. It is NOT job related.

There are no statistics to show that ANY of the cancers in AS 23.30.121 (b) are *caused* by fire fighting, although there may be a correlation. There is no correlation, and certainly no proof of causation, that I'm aware of that extends to police officers, EMTs, or paramedics. Aside from the fact that fire fighters may be exposed to chemically toxic substances more regularly than EMTs, paramedics and police officers, I am unaware of any evidence that first responders as a group have a greater rate of exposure and resultant cancer rates than the general public.

If there is evidence that a cancer is work related by a preponderance of the evidence, then workers' compensation would apply, as with other work related injuries. A presumption is not necessary.

As you are likely aware, these types of workers' compensation claims are some of the most expensive claims for employers. The workers' compensation system is not equipped to function as a primary insurance carrier for diagnosed medical conditions that are not clearly linked, by evidence, to employment. Please help local governments in Alaska oppose this unfunded mandate and focus on the more serious issues of the day.

Thank you,



Kevin Smith
Executive Director

¹ Invasive cancer excludes basal and squamous cell carcinomas of the skin except when these occur on the skin of the genital organs, and in situ cancers except urinary bladder. Urinary bladder cancer includes invasive and in situ. (*Centers for Disease Control and Prevention (CDC) and the National Cancer Institute (NCI)*).

