

Alaska State Legislature
Senate Committee on Judiciary

February 22, 2026

Submitted electronically to: Senate.Judiciary@akleg.gov

RE: SB 251, An Act Repealing the Workers' Compensation Appeals Commission - NAMIC's Written Testimony in Opposition

Thank you for affording the National Association of Mutual Insurance Companies (NAMIC) an opportunity to submit written testimony to the Senate Committee on Judiciary for the public hearing on SB 251, An Act Repealing the Workers' Compensation Appeals Commission.

The National Association of Mutual Insurance Companies (NAMIC) is the foremost trade association representing the property/casualty insurance industry. Serving more than 1,300 member companies - including local and regional insurers as well as some of the nation's largest carriers - NAMIC members collectively write \$467 billion in annual premiums, representing 61% of the homeowners and 53% of the automobile insurance markets. For more than 130 years, NAMIC has been the leading voice advancing public policy solutions and regulatory frameworks that promote a strong, competitive market and protect our members and their policyholders.

NAMIC is opposed to SB 251, because we do not see how the proposed repeal of the Workers' Compensation Appeals Commission would streamline, economize or improve the quality of review of workers' compensation appeals. NAMIC is concerned that the proposed procedural change will have an adverse impact upon the workers' compensation system and lead to legal delays and more costly adjudication of disputed claims. The current and long-standing process of submitting appeals to the Commission seems to be working and affords the parties with an expedited review process that involves workers' compensation subject-matter experts. Repealing the Commission and directing appeals to the Superior Court could result in a delay in resolving legal disputes, because of the busy case docket of the judicial system and the procedural requirements of the adjudicatory legal process. NAMIC is not sure how this proposed change to the appeals process would be beneficial to injured workers, employers or workers' compensation insurers. The litigation process is renowned for its procedural complexity, which makes legal representation more expensive for the parties and the entire workers' compensation system.

NAMIC believe that if policymakers believe certain aspects of the current appeals process need to be revised, the focus should be upon tweaking the well-established process in place to improve it, as opposed to fundamentally altering the appeals process with a change that results in the loss of the utilization of workers' compensation commissioners who extensive workers' compensation claims experience.

For the aforementioned reasons, we respectfully request a NO VOTE of SB 251.

Thank you for your time and consideration. Please feel free to contact me at 303.907.0587 or at crataj@namic.org, if you would like to discuss NAMIC's written testimony.

Respectfully,

A handwritten signature in black ink, appearing to read "Christian John Rataj". The signature is fluid and cursive, with a prominent initial "C" and "J".

Christian John Rataj, Esq.
NAMIC Senior Regional Vice President
State Government Affairs, Western Region