

1
2 STATE OF OREGON
3 DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
4 DIVISION OF FINANCIAL REGULATION

5 IN THE MATTER OF:) FINAL ORDER
6 BIGHORN CONSTRUCTION) OAH No. 2018-ABC-01962
7 SOLUTIONS LLC) Agency Case No.: INS-WCA 18-06-008
8

9 **Procedural History**

10 The Director of the Oregon Department of Consumer and Business Services (Director),
11 by and through Division of Financial Regulation, (Division), commenced the above entitled
12 administrative proceeding to review a workers' compensation insurance final premium audit
13 billing (billing) issued by SAIF Corporation (insurer) to Bighorn Construction Solutions, LLC
14 (employer) pursuant to Oregon Revised Statutes (ORS) 737.256(1), ORS 737.505(3), and
15 Oregon Administrative Rules (OAR) 836-043-0200 *et. seq.*

16 On September 4, 2018, the Division referred employer's hearing request contesting the
17 billing to the Office of Administrative Hearings (OAH). The issue before OAH was whether
18 insurer's Final Premium Audit, dated June 1, 2018, was correct. By Proposed Order dated April
19 3, 2019, Senior Administrative Law Judge Samantha A. Fair Affirmed the insurer's Final
20 Premium Audit, dated May 10, 2018.
21

22 **Findings of Fact, Conclusions of Law and Opinion**

23 The Director adopts, and incorporates herein by this reference, the findings of fact,
24 conclusions of law, and reasoning of the Proposed Order as the findings of fact, conclusions of
25 law, and reasoning of this Final Order.
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27 **Order**

28 SAIF Corporation's Final Premium Audit issued May 10, 2018 is AFFIRMED (and the
29 Stay of Collections issued September 26, 2018 is vacated.
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Dated September 13, 2019

/s/ Andrew R. Stolfi
Andrew Stolfi
Administrator, Division of Financial Regulation
Insurance Commissioner
Department of Consumer and Business Services

**BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF OREGON
for the
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION**

In the Matter of the Final Premium Audit of	)	ORDER GRANTING STAY OF
	)	COLLECTION
	)	
BIGHORN CONSTRUCTION	)	OAH Case No. 2018-ABC-01962
SOLUTIONS, LLC	)	Agency Case No. INS-WCA 18-06-008

Petitioner has requested a stay of collection in the matter of the final premium audit billing for the above captioned case. A stay request may only be granted for the disputed portion of the insurer's billing. OAR 836-043-0170(5).

The employer alleges that the insurer incorrectly classified premium for the audit period of January 1, 2017 through January 1, 2018.

After review of the stay request, copies of which were previously served on the insurer or are included with this Order, the Administrative Law Judge finds that Petitioner has shown good cause for issuance of a stay of collection pursuant to ORS 737.505(5).

IT IS HEREBY ORDERED that all collection efforts of the \$10,208.36 disputed by Petitioner be stayed during the pendency of this contested case.

Objections to, or motions for the dissolution of the stay may be filed at any time during the pendency of this contested case. The Administrative Law Judge will review any objections which have been served on all parties. If an order dissolving the stay is not issued within ten days of receipt of an objection, the objection is to be deemed denied.

Dove L. Gutman
Administrative Law Judge
Office of Administrative Hearings

CERTIFICATE OF MAILING

On September 26, 2018, I mailed the foregoing ORDER GRANTING STAY OF COLLECTION issued on this date in OAH Case No. 2018-ABC-01962.

By: First Class Mail

Robert L Stewart
Bighorn Construction Solutions, LLC
63689 Scenic Dr.
Bend OR 97703

Tracy Meyer
SAIF Corporation
400 High Street SE
Salem OR 97312

Nate Boughton, Special Assistant Attorney General
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400 High Street SE
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By: Electronic Mail

Gail Gage, Agency Representative
Division of Financial Regulation
350 Winter Street NE
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Lucy M Garcia
Hearing Coordinator

**BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF OREGON
for the
DEPARTMENT OF CONSUMER & BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION
PREMIUM AUDIT WORK**

IN THE MATTER OF:	)	PROPOSED ORDER
	)	
BIGHORN CONSTRUCTION	)	OAH Case No. 2018-ABC-01962
SOLUTIONS LLC	)	Agency Case No. INS-WCA 18-06-008
	)	
	)	

HISTORY OF THE CASE

On May 10, 2018, SAIF Corporation (SAIF) issued a Final Premium Audit Billing to Bighorn Construction Solutions LLC (Bighorn) for the period January 1, 2017 to January 1, 2018. On June 22, 2018, Bighorn filed an objection to the billing with the Department of Consumer and Business Services, Division of Financial Regulation (Department). On August 20, 2018, Bighorn filed a Petition with the Department requesting a hearing and a stay of collection during the pendency of the contested case proceeding.

On September 4, 2018, the Department referred the matter to the Office of Administrative Hearings (OAH). The OAH assigned Administrative Law Judge (ALJ) Dove Gutman to preside over the matter.

On September 26, 2018, the OAH issued an Order Granting Stay of Collection of \$10,208.36 during the pendency of the contested case proceeding. On October 1, 2018, SAIF filed an objection to the dollar amount of the stay. On October 10, 2018, the OAH issued an Amended Order Granting Stay of Collection of \$6,703.

On November 6, 2018, ALJ Rick Barber, on ALJ Gutman's behalf, convened a telephone prehearing conference. No one appeared on behalf of Bighorn. SAIF appeared and was represented by Special Assistant Attorney General (AAG) Nathan Boughton. Tracy Meyer, a SAIF premium audit analyst, and Brittany Holland, a SAIF premium audit specialist, also appeared. ALJ Barber scheduled the hearing for March 25, 2019, and set deadlines for submission of witness lists and exhibits.

On March 15, 2019, the OAH reassigned the matter to ALJ Samantha Fair.

ALJ Fair convened a hearing on March 25, 2019, in Salem, Oregon. Bighorn appeared and was represented by Robert Stewart, managing member of Bighorn, who testified. SAIF appeared and was represented by Special AAG Boughton. Testifying on behalf of SAIF was Ms.

Meyer. The record closed on March 25, 2019, at the conclusion of the hearing.

ISSUES

Whether SAIF's May 10, 2018 Final Premium Audit Billing correctly billed Bighorn by:

- Reclassifying Bighorn's payroll for Daniel Parrish to the classification code 5645; and
- Charging a rate of 0.174124 for the classification code 5645.

ORS 737.318, OAR 836-042-0001 *et seq.* and OAR 836-043-0001 *et seq.*

EVIDENTIARY RULINGS

Exhibits A1 through A12, offered by SAIF, were admitted into the record without objection.

FINDINGS OF FACT

1. Bighorn was a small construction company, first formed in Oregon in 2015, that performed framing services as a subcontractor on single-family residential homes that were less than three stories.¹ During the period January 1, 2017 to January 1, 2018 (the audit period), Bighorn performed work for the following general residential contractors: Adair Homes, Ally Brooke, and Arbor Homes. (Ex. A11 at 4; test. of Stewart and Meyer.) These jobs all involved framing of new single family residences of less than three stories. (Test. of Stewart.)

2. In 2017, Bighorn hired Daniel Parrish as the project manager for all of Bighorn's jobs, which allowed Mr. Stewart, the owner, to focus solely on the bookkeeping tasks of managing Bighorn. Bighorn and Mr. Parrish understood that his continued employment with Bighorn was contingent on Mr. Parrish generating enough job contracts to warrant his hourly pay of \$37.50, a much greater rate than the \$18 to \$25 per hour typically made by carpenters. After the first year when there was not enough job contracts to support Mr. Parrish's pay, Mr. Parrish ceased working for Bighorn. (Test. of Stewart.)

3. While working for Bighorn, Mr. Parrish's job duties included meeting with clients, visiting prospective job sites, providing clients with job estimates, visiting active job sites, supervising and directing Bighorn's carpenters' work, answering any questions by the carpenters, and performing any hands-on carpentry services whenever needed to make sure the necessary work was completed as scheduled. (Test. of Stewart.)

4. For the audit period, Bighorn provided SAIF with 15 of Mr. Parrish's weekly time cards. Nine of the completed time cards were on a form Mr. Stewart used in his prior out-of-state contractor business (Primary time cards). Five of the completed time cards were on a form provided by SAIF to Bighorn (SAIF time cards). One completed time card was not on a time card form but simply a freeform handwritten time card (Hand time card). (Ex. A12 at 1-16; test.

¹ Bighorn has ceased operations since the SAIF audit. (Test. of Stewart.)

of Stewart and Meyer.)

5. The Primary time cards listed Mr. Parrish's name, the dates for the applicable weekly pay period, a column for the "Job Name," a column for "Phase No.," and columns for each day of the week. (Ex. A12 at 1.) At the bottom of the Primary time cards, there were typed numbers from 04 to 41 with typed descriptions next to each number, such as 11 was rough carpentry, except for numbers 38 and 39. The typed descriptions for numbers 38 and 39 had been whited out and replaced with hand-written descriptions. Number 38's hand-written description appeared as "designing" or "designing/estimating" on the Primary time cards. (*Id.* at 1-2; 8-12; 14-16.) Number 39 was crossed out and the hand-written description that appeared next to the blacked-out number was "supervision" or "supervision/P.M." (*Id.*) The Job Names on Mr. Parrish's Primary time cards identified either a job site, such as Maupin or Sunriver, or the general contractor's name, such as Arbor or Adair. Under Phase No., Mr. Parrish's Primary time cards would show one of the following numbers: 11, 38 or 39. For each day of the week in which Mr. Parrish worked, the number of hours worked in any particular work day was assigned to only one Phase No. of those three numbers except for one Primary time card. On that Primary time card, the Phase no. was listed as 39 for each day of reported work; however, below this list was a hand-written notation stating "Phase 38." (*Id.* at 11.) The Primary time cards provided no further information regarding the work performed by Mr. Parrish. (*Id.* at 1-2; 8-12; 14-19.)

6. The SAIF time cards listed Mr. Parrish's name, the dates for the applicable weekly pay period, and the following columns: date, job number or customer, job description, class code, hours, and overtime. The customer was identified by the name of the general contractor except on one SAIF time card in which the job site was provided. As with the Primary time cards, the daily hours worked by Mr. Parrish were assigned one of the following job descriptions: Maupin, underfloor, build walls, deck floor, frame walls, and supervise. (Ex. A12 at 3-6, 13.) On two days of one SAIF time card, the job description column was left blank. (*Id.* at 4.) On the SAIF time card with the job description of Maupin listed for each day, the phrase "Phase 38" was written below the completed columns. (*Id.* at 3.) This time card did not include any explanation as to the meaning of "Phase 38." (*Id.*)

7. The Hand time card listed Mr. Parrish's name and the applicable weekly pay period, noted the job as Adair, listed the total number of hours worked for each day of the week, and described the work as "roof framing." (Ex. A12 at 7.)

8. When Mr. Parrish initially began working for Bighorn, he completed his own time cards and noted his work as framing because that was the work Bighorn performed as a subcontractor. Both Mr. Parrish and the carpenters provided general simplified descriptions of their work on their time cards. (Test. of Stewart.)

9. The National Council on Compensation Insurance, Inc. (NCCI) is the workers compensation rating organization for Oregon. NCCI defines the classification codes (Class) for work performed by employees and sets annual billing rates for each Class. Insurers, including SAIF, apply an overhead cost to the billing rates, submit the adjusted billing rates to the Department for approval, and, once approved, charge employers the approved billing rates for each Class. (Test. of Meyer.)

10. NCCI titles Class 5403 as “Carpentry-NOC²” and defines it as carpentry work on “Commercial or Dwellings Over 3 Stories.” (Ex. A4 at 4.) It further provides, in relevant part:

Class 5403 applies when all of the carpentry work in connection with the construction of residential dwellings exceeding three stories in height or commercial buildings and structures is performed by employees of the same carpentry contractor or general contractor responsible for the entire new construction project. This includes the construction of exterior, load bearing walls, * * *, rough floors, * * *, roof deck, all types of roofing materials, * * *. * * *. The construction of residential dwellings not exceeding three stories in height to be separately rated as class 5645[.]

(*Id.* at 4-5.)

11. NCCI titles Class 8742 as “Estimator in Field-No Job Hazards” and provides, in relevant part:

Class 8742 applies to employees who are acting as sales persons, field representatives, outside public relations personnel, collectors away from your premises. Class 8742 also applies to employees who perform bid-estimating duties away from your premises, with no exposure to job hazards. Class 8742 does not apply to job site visits once construction work has begun[.]

(Ex. A4 at 10.)

12. NCCI titles Class 5645 as “Carpentry-Dwelling 3 Stories or Less” and provides, in relevant part:

Class 5645 applies to your employees involved in direct labor and supervision of all carpentry work in connection with the construction of residential dwellings not exceeding three stories in height when you are the carpentry contractor or general contractor responsible * * *. * * *. Carpentry work includes the construction of exterior, load bearing walls, * * *, rough floors, * * *, roof deck, all types of roofing materials, * * *. * * *. Merely performing a singular task such as repairing, replacing, or installing wallboard does not amount to residential dwelling carpentry repair or remodeling under class 5645. These singular repair operations are separately rated to the appropriate classifications representing that specific trade. However, when activities of this nature take place in connection with operations that involve some framing or structural renovation of the dwelling, class 5645 applies to these specialty operations[.]

² “NOC” means “not otherwise classified.” (Test. of Meyer.)

(Ex. A4 at 8.)

13. When Bighorn reported its payroll for the audit period to SAIF, it reported total payroll of \$76,222, of which \$52,026 was reported as Class 5403. Bighorn reported \$21,314 of its payroll to Class 8742 and reported the remaining payroll to a couple other Classes. (Ex. A10 at 1-2.) As a result of SAIF's audit, Bighorn's total payroll was determined to be \$79,870, as shown in Bighorn's accounting records and the amount Bighorn reported to the Oregon Employment Department. (*Id.* at 12; test. of Meyer.)

14. On May 10, 2018, SAIF issued Bighorn a Final Premium Audit Billing for the audit period. SAIF reclassified all wages, including Mr. Parrish's wages, to Class 5645 and billed Class 5645 at the adjusted billing rate of 0.174124. (Ex. A11 at 1, 7.) After the issuance of the Final Premium Audit Billing, Mr. Stewart spoke with Ms. Meyer, SAIF's audit analyst, and provided additional details of Mr. Parrish's job duties, indicating that Bighorn primarily intended for Mr. Parrish to secure and oversee the construction projects as a project manager and he was not hired to perform carpentry tasks. (Test. of Meyer.)

15. In the Petition, Bighorn asserted that the adjusted billing rate for Class 5645 should be 0.1505 and that Mr. Parrish's wages should be billed at the rate of 0.002626 as an "Estimator in-Field – No Job Hazard." (Ex. A8 at 2.)

16. Based upon NCCI's set billing rate for Class 5645, SAIF submitted and received approval from the Department to bill Class 5645 at the rate of 0.174124 for the year 2017. For the year, 2018, SAIF submitted and received approval from the Department to bill Class 5645 at the rate of 0.1505. (Test. of Meyer.) The adjusted billing rate for Class 8742 for the year 2017 was 0.002626. (Ex. A11 at 7.)

CONCLUSIONS OF LAW

SAIF correctly billed Bighorn when it:

- Reclassified Bighorn's payroll for Daniel Parrish to classification code 5645; and
- Charged a rate of 0.174124 for the classification code 5645.

OPINION

In its Petition to the Department, Bighorn disputed SAIF's reclassification of payments made to Mr. Parrish from Class 5403 and 8742 to Class 5645 and disputed the rate charged for Class 5645. Bighorn bears the burden to establish that SAIF's premium audit is incorrect. *Salem Decorating v. NCCI*, 116 Or App 166 (1992) *rev den* 315 Or 643 (1993). To sustain this burden, Bighorn must prove its case by a preponderance of the evidence. *Dixon v. Board of Nursing*, 291 Or App 207, 213 (2018) (in administrative actions, burden of proof is by a preponderance of the evidence). Proof by a preponderance of the evidence means that the fact finder is persuaded that the facts asserted are more likely true than not true. *Riley Hill General Contractor v. Tandy Corp.*, 303 Or 390, 402 (1987).

Pursuant to ORS 737.310, ORS 737.560 and OAR 836-043-0001 *et seq.*, NCCI is the rating organization licensed in Oregon to establish and file rates and classifications for workers' compensation insurance. OAR 836-043-0005(14). NCCI produces a Basic Manual and a Scopes Manual for workers' compensation rates and classifications that are used by Oregon insurers in their audit procedures. OAR 836-043-0115.

Classification Codes 5403, 8742 and 5645

Bighorn contends that the work performed by Mr. Parrish is management work and should be charged at the 0.002626 rate applicable to Class 8742. SAIF contends that it properly classified Mr. Parrish's wages as Class 5645 because Bighorn performed construction work on residential structures that were less than three stories and failed to keep verifiable time records that would allow for the use of other Classes. The evidence establishes that SAIF correctly classified Mr. Parrish's payroll as Class 5645.

Bighorn originally classified the bulk of its payroll, including Mr. Parrish's wages, as either Class 5403 or Class 8742. NCCI provides that Class 5403 only applies to commercial or residential structures that exceed three stories. Because Bighorn performed work on residential structures of less than three stories, Bighorn's operations did not meet the qualifications for Class 5403. Instead, Bighorn's operations meet the qualifications of Class 5645, which includes construction work performed on residential structures that are three stories or less.

Bighorn argued that Mr. Parrish's wages should be applied to Class 8742, estimator in the field with no job hazards, and, during the hearing, also argued that Mr. Parrish's wages should be applied to a project manager Class because Mr. Parrish was hired primarily to perform project management work, not hired to perform carpentry work. However, the evidence clearly established that Mr. Parrish performed a variety of job duties, including actual carpentry work when needed and supervision at active job sites.

Oregon law allows an individual employee's payroll to be divided among different Classes when the employee performs work applicable to more than one Class, so long as the employer maintains verifiable payroll records to support such a division of an employee's payroll. Verifiable payroll records do not simply mean the actual payroll records used by the employer. Payroll records must meet the specific criteria outlined in OAR 836-042-0060(4) to qualify as verifiable. OAR 836-042-0060 provides, in part:

- (1) When there is an interchange of labor, the payroll of an individual employee shall be divided and allocated among the classification or classifications that may be properly assigned to the employer, provided verifiable payroll records maintained by the employer disclose a specific allocation for each such individual employee, in accordance with the standards for rebilling set forth in OAR 836-043-0190 and this rule.
- (2) This rule does not apply to a single employee whose duties vary within exposure areas normally anticipated by the scope of a single

classification or who spends only a limited amount of time, on an infrequent or irregular basis, in a classification exposure that is not a normal job function for that employee. As used in this section, “infrequent or irregular” means that the time spent in the classification exposure is limited, is not anticipated in the normal duties of the employee and occurs only randomly.

(3) When verifiable payroll records are required with respect to a single employee and the employer does not maintain them as required in this rule, the entire payroll of the employee shall be assigned to the highest rated classification exposure in accordance with the standards for rebilling set forth in OAR 836-043-0190.

(4) For purposes of this rule, payroll records of an employee are verifiable if they have the following characteristics:

(a) The records must establish a time basis, and the time basis must be hourly or a part thereof, daily or part thereof, weekly or part thereof, monthly or part thereof or yearly or part thereof;

(b) For each salaried employee, the records must also include time records in which the salary is converted to an hourly, daily, weekly, monthly or yearly rate and then multiplied by the time spent by the employee in each classification exposure;

(c) The records must include a description of duties performed by the employee, to enable the insurer to determine correct classification assignment. Records requiring additional explanation or interpretation are not considered to be verifiable; and

(d) The records must be supported by original entries from other records, including but not limited to time cards, calendars, planners or daily logs prepared by the employee or the employee’s direct supervisor or manager. Estimated ratios or percentages do not comply with the requirement of this subsection and are not acceptable for verification. Verifiable records must be summarized in the insured employer’s accounting records.

Mr. Parrish was an hourly employee, earning \$37.50 per hour, and his time cards, which were completed by Mr. Parrish, reported his time on an hourly basis. Therefore, those payroll records, to the extent provided by Bighorn for Mr. Parrish,³ met the criteria of OAR 836-043-

³ The payroll records were incomplete because not all of Mr. Parrish’s work hours were reported on the 15 time cards provided by Bighorn. (Exs. A10 at 19; A12.)

0190(4)(a) and (d).⁴ According to Mr. Parrish's time cards, he reported performing the following framing services: rough carpentry, roof framing, underfloor, build walls, deck floor, and frame walls. As described by NCCI, Class 5645 includes all of these activities. Additionally, Class 5645 requires specific work that could be reported to other Classes to be included in Class 5645 when it is performed in conjunction with the framing of residential structures. Because Mr. Parrish performed carpentry work on residential structures of less than three stories in conjunction with Bighorn's framing services, his direct carpentry work should be classified as Class 5645.

Bighorn argued that Mr. Parrish erred when reporting entire work days to direct carpentry work. However, OAR 836-043-0190(4)(c) requires verifiable payroll records to include an accurate and complete description of the work performed that would enable the insurer to determine the correct Classes. If the time cards, which are Bighorn's only supporting payroll documentation, contain inaccurate descriptions of the work performed, then the payroll records are not verifiable. Pursuant to OAR 836-043-0190(3), absent verifiable payroll records, Mr. Parrish's payroll must be assigned to the highest rated classification exposure, here Class 5645. SAIF properly classified the framing services hours reported by Mr. Parrish as Class 5645.

Mr. Parrish also reported working as a supervisor, a project manager, and designer or estimator. Class 5645 specifically includes supervision of the direct carpentry work. Therefore, SAIF properly classified all supervision hours reported by Mr. Parrish to Class 5645. The time cards failed to contain any information as to what duties Mr. Parrish performed as a project manager, designer or estimator. Because project manager work could include duties that would be incorporated in Class 5645, such as Mr. Parrish's supervision duties, a project manager's duties would have to be specifically listed to insure accurate classification of the payroll. Similarly, estimator work only meets the requirements of Class 8742 if it is performed prior to the performance of any construction work on the site. Absent information about those specific duties or the timing of the estimator work, the payroll records associated with such work are not verifiable because they do not provide the necessary detail to allow the insurer to correctly classify Mr. Parrish's project manager, estimator and designer work. Additionally, project manager work was always reported on the same line as supervision. Pursuant to OAR 836-043-0190(1) and (3), because Mr. Parrish did not separately allocate his supervision work from his project manager work, the associated payroll must be assigned to the highest rated classification exposure, here Class 5645. SAIF properly classified Mr. Parrish's entire payroll to Class 5645.

Applicable Billing Rate for Code 5645

At hearing, Bighorn withdrew its objection to SAIF's use of the billing rate of 0.174124 for Class 5645. As the evidence established, the billing rate of 0.1505 for Class 5645 was applicable to 2018 payroll, not 2017 payroll. In 2017, the approved billing rate for Class 5645 was 0.174124, which SAIF used in its Final Premium Audit Billing.

⁴ Because Mr. Parrish was an hourly employee, the criterion in OAR 836-043-0190(4)(b) was not applicable.

ORDER

I propose the Department of Consumer and Business Services, Division of Financial Regulation, issue the following order:

SAIF Corporation's May 10, 2018 Final Premium Audit Billing for the audit period January 1, 2017 to January 1, 2018, is **AFFIRMED**. Bighorn Construction Solutions LLC is liable for the adjusted premium.

Samantha A. Fair

Administrative Law Judge
Office of Administrative Hearings

EXCEPTIONS TO PROPOSED ORDER

Pursuant to ORS 183.460, the parties are entitled to file written exceptions to this Proposed Order and to present written argument concerning those exceptions to the Director. Written exceptions must be received by the **Division of Financial Regulation** within 30 days following the date of service of this Proposed Order. You may send exceptions via email to gail.m.gage@oregon.gov, or via mail to:

Gail M. Gage
Compliance Specialist 3
Division of Financial Regulation
PO Box 14480
Salem, OR 97309-0405

CERTIFICATE OF MAILING

On April 3, 2019, I mailed the foregoing Proposed Order issued on this date in OAH Case No. 2018-ABC-01962.

By: First Class Mail

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Hearing Coordinator