



MEMORANDUM

June 25, 2024

To: Lauren Eldridge, Hearings Officer

From: Katy Gunville, WCB Rules Coordinator

Subject: Public Comment Concerning Proposed Amendments to OAR 438-005-0055(1), (2)

At the Board's May 16, 2024, public meeting, the Members requested that Board staff assess the reading level of the proposed amendments to OAR 438-005-0055(1) and (2). To complete this task, Board staff used a tool called the Hemingway Editor that can be found here: [Hemingway Editor \(hemingwayapp.com\)](https://hemingwayapp.com). Board staff regularly use this tool to assess the reading level of text on the Board's website. The Workers' Compensation Division has also used this tool to determine the reading level of its proposed rule amendments.

The Hemingway Editor tool determined that OAR 438-0050055(1) and (2), including the proposed amendments, have a 6th grade reading level. For comparison, the tool determined that the current versions of OAR 438-005-0055(1) and (2), without the proposed amendments, have an 11th grade reading level. Thus, the proposed amendments improve the readability of the rule by five grade levels.