

**Department of Labor & Workforce Development
Stakeholder Meeting Public Comments**

Division/Agency	Regulation Citation	Public Comment	Any proposed solution/language (if not, state why)
DETS/UI	8 AAC 85.015 (a)	We are writing specifically regarding temporary staffing agencies. Currently, we are required to report unemployment wages under our client's unemployment account. To do so, we have to get a limited POA signed and jump through a lot of hoops that feel completely unnecessary. A lot of our clients flat out refuse to sign a PoA form for us, and it just causes a lot of confusion. Every other state we file in, and we file in most states, we report our employees (that work at a client site) under our unemployment account. Alaska is the only state that requires us to report under our clients accounts.	Staffing Agency Reporting <i>Acknowledged</i> – Statutory requirement. Elimination of 8 AAC 85.015(a) would not change reporting requirements for staffing/leasing agencies as this is actually a statutory requirement under AS 23.20...Article 4 of AS 23.20 describes Alaska's Experience Rating system requiring the accurate and distinct reporting of individual employers payroll under its own account, so that the payroll declines for that employer's business activity accurately reflect that employer's experience with unemployment risk, and they are assigned the proper UI tax rate to maintain trust fund solvency. The regulation clarifies statutes when defining a liable employer, as it relates to "service", "employment", "employer", and "employing unit" and the determination of an employing unit as an employer. Alaska is the only state to use the experience rating system, Payroll Variation. Other states use systems such as reserve-ratio, benefit-ratio, and benefit-wage-ratio. <i>Relevant statute references: AS 23.20.180, 23.20.315, 23.20.525(a)(8)(ABC), Article 4 of AS 23.20 Experience Rating</i>
DETS/UI	8 AAC 85.015 (a)	We are writing specifically regarding temporary staffing agencies. Currently, we are required to report unemployment wages under our client's unemployment account. To do so, we have to get a limited POA signed and jump through a lot of hoops that feel completely unnecessary. A lot of our clients flat out refuse to sign a PoA form for us, and it just causes a lot of confusion. Every other state we file in, and we file in most states, we report our employees (that work at a client site) under our unemployment account. Alaska is the only state that requires us to report under our clients accounts.	Staffing Agency Reporting <i>Acknowledged</i> – This is a statutory requirement. Elimination of 8 AAC 85.015(a) would not change reporting requirements for staffing/leasing agencies as this is actually a statutory requirement under AS 23.20...Article 4 of AS 23.20 describes Alaska's Experience Rating system requiring the accurate and distinct reporting of individual employers payroll under its own account, so that the payroll declines for that employer's business activity accurately reflect that employer's experience with unemployment risk, and they are assigned the proper UI tax rate to maintain trust fund solvency. The regulation clarifies statutes when defining a liable employer, as it relates to "service", "employment", "employer", and "employing unit" and the determination of an employing unit as an employer. Alaska is the only state to use the experience rating system, Payroll Variation. Other states use systems such as reserve-ratio, benefit-ratio, and benefit-wage-ratio. <i>Relevant statute references: AS 23.20.180, 23.20.315, 23.20.525(a)(8)(ABC), Article 4 of AS 23.20 Experience Rating</i>
DETS/UI	N/A	As a small Alaska employer, I receive recurring mail notices from the Department, particularly the Alaska Quarterly Contribution Reports and Unemployment Insurance claim packets when an employee separates. These notices arrive by physical mail, often multiple times per quarter, and require manual handling and scanning to complete. I strongly encourage the Department to modernize this process by offering electronic delivery and submission options for all employer correspondence and reports. Electronic communication would: Greatly reduce paper waste and mailing costs; Speed up employer response and data entry; and Minimize delays caused by mail transit or misplaced letters. I believe allowing employers to opt in to electronic notifications and submissions would make compliance faster, cheaper, and more accurate for both the Department and employers.	Electronic Reporting <i>Accepted</i> – Agency has already implemented electronic reporting options. The division has already implemented electronic reporting options and is working to turn off mailing of paper forms for online filers. The division currently allows paperless communications with employers for notice of separations, fact-finding and determinations through a SIDES portal that the employer can access. SIDES enrollment is an election any employer may request through our website or by emailing the division. Employers can also elect to be contacted via email if preferred, however they will continue to receive notice of separation and determinations through mail. Action Taken to Date: SIDES information was emailed to Sveta on 11/10/2025.
DETS/UI	8 AAC 85.100 8 AAC 85.410 8 AAC 85.420 8 AAC 85.085 and 8 AAC 85.151	I believe the means testing and rationing standards are prohibitively strict. We are dealing with people who are truly destitute. The need for high end computer/telephone equipment and sophistication to interface with the program, the incredible volume and detail needed relative to employment and residence history, the requirement to accept ANY JOB offered, regardless of its compatibility with the worker's skillset and aspirations (let alone financial need), and the high need to interface with often hostile, deceptive, and/or abusive former employers creates a bottleneck in service provision precisely for the people who need it most.	Claims Filing Standards/Requirements <i>Acknowledged</i> – Comment does not accurately describe the requirement. 8 AAC 85.100 currently requires claimants to provide the minimum amount of information needed to process their claim in compliance with statutes. The claimant is required to provide the name and address of the claimant's last employer, the dates of employment, and the reason for separation from that employer to determine the correct last employer and potential separation penalties under AS 23.20.379. Claimants are required to provide mailing and physical address information to properly administer AS 23.20.340, AS 23.20.390, and AS 23.20.430. This information can be provided online or over the phone. DETS has computers and phones available at Job Centers across the state that claimants can use for filing their claims. 8 AAC 85.410 defines suitable work as work in the claimants' customary occupation or is work for which the claimant has training and experience. The wages, hours, or other conditions of work offered to a claimant must not be substantially less favorable than those prevailing for similar work in the locality. 8 AAC 85.420 currently provides that claimants must be willing to accept and perform suitable work which the claimant does not have good cause to refuse.

	8 AAC 03.151		<p>Claimants and employers are not required to interface during the fact-finding process. A division representative acts as the intermediary and is responsible for the collection of information from each interested party.</p> <p>8 AAC 85.085 mandates each interested party will be given notice that an issue of eligibility exists and will be allowed to provide information requested by the division or to submit relevant information of their own.</p> <p>8 AAC 85.151 mandates that an interested party may file an oral or written appeal from a determination or redetermination issued under AS 23.20 and this chapter. Hearings are conducted almost exclusively telephonically and are moderated by the appeals officer. There is no need for the claimant to interact directly with the employer except upon cross-examination during an appeal.</p>
DETS/UI	8 AAC 85.020	<p>Current quarterly reporting requirements force businesses to submit information already provided to other state agencies (Department of Revenue, DCCED, etc.). Alaska employers waste countless hours duplicating data entry.</p> <p>Recommendation: Implement integrated reporting through myAlaska.gov where one submission satisfies multiple agency requirements. This would save small businesses an estimated 10-15 hours per quarter.</p>	<p>Simplify Employer Reporting Requirements</p> <p><i>Under Consideration</i> – Outside the scope of AO 360 but will look into the possibility of data sharing. Unemployment Insurance Tax will reach out to Commerce and Revenue to see about the possibility of data sharing. It would require collaboration amongst the state agencies to develop a data sharing agreement that complies with all federal and state confidentiality requirements such as AS 23.20.095 and 20 CFR Ch V Part 603.6.</p>
	8 AAC 85.290	<p>Alaska's "average industry tax rate" for new employers is among the highest in the nation, creating an immediate barrier to business formation. New businesses already face significant startup costs without this additional burden.</p> <p>Recommendation: Establish a graduated rate structure for new employers starting at 1.0% in year one, increasing to industry average by year three. This allows businesses to establish cash flow before facing full tax burden.</p>	<p>Reform New Employer Tax Rate Calculation</p> <p><i>Acknowledged</i> – Does not comply with statutory and federal requirements.</p> <p>Employers with less than four quarters of wages during the three-year rating period are considered "new" and are not eligible for an experience rate under AS 23.20.280. New employers are assigned the industry rate, which is an average of experience rated employers within that industry. Average industry tax rates are calculated for the 25 different industry classifications as mandated by AS 23.20.170. Those industries that have higher decline of wages are issued a higher tax rate. Established industry rates may increase or decrease based on the solvency of the Unemployment Insurance trust fund. FUTA §3303(a) does not permit employer rates lower than 1.00%. The highest employer industry rate for 2024 was 1.18%. The highest employer industry rate for 2025 was 1.00%.</p>
	8 AAC 85.291 & 85.292	<p>Current successor employer regulations create unnecessary delays and confusion during business transfers, often resulting in double taxation during transition periods.</p> <p>Recommendation: Create a single online portal for business transfer notifications with automatic rate transfers within 30 days. Eliminate redundant paperwork between buyer and seller.</p>	<p>Streamline Business Acquisition Procedures</p> <p><i>Accepted</i> – Agency has already implemented electronic reporting options.</p> <p>While the division makes paper forms available to employers to notify the division of business changes or acquisitions, 8 AAC 85.291 and 8 AAC 85.292 do not prohibit employers from utilizing electronic methods such as online registration, email, or uploading documents through our online employer services. Once a determination has been made that an employer is a successor, per 8 AAC 85.030(a)(3), wages paid in a calendar year to an employee are to be combined with those wages paid by the successor to determine the tax base limitation. The division does calculate these combined amounts annually as a courtesy and calculates excess taxes paid by an employer and employee. However, the employer has the ability to calculate the tax base limitation themselves per employee based upon these regulations.</p>
	8 AAC 85.150-157	<p>The current appeals system requires in-person hearings in limited locations, forcing rural Alaska businesses to travel extensively or forfeit their appeal rights. Average appeal resolution takes 90-120 days.</p> <p>Recommendation: Implement video conferencing for all appeals (8 AAC 85.152). Establish 60-day resolution timeline requirements. Create expedited review for claims under \$5,000. Allow email submission of appeal documentation (8 AAC 85.151).</p>	<p>Implement video conferencing for all appeals</p> <p><i>Acknowledged</i> – Comment does not accurately describe the requirement.</p> <p>Currently, hearings are almost exclusively conducted telephonically regardless of participant location.</p> <p>Establish 60-day resolution timeline requirements</p> <p><i>Acknowledged</i> – does not comply with federal requirements, which exceed the recommendation.</p> <p>Appeals timeliness is set by federal policy. Current standards are less than or equal to 30 days for lower authority appeals and less than or equal to 40 days for higher authority appeals.</p> <p>Create expedited review for claims under \$5,000</p> <p><i>Acknowledged</i> – Creates undue burden on interested parties.</p> <p>A vast majority of appeals have payment amounts under \$5,000. AS 23.20.415 entitles interested parties to appeal rights, while 8 AAC 85.010 defines an "interested party". 8 AAC 85.151 entitles interested parties to their appeal rights within 30 days from the date the determination is mailed. The primary way to expedite an appeal would be to shorten the 30-day appeal window. However, the 30-day appeal window provides interested parties time to receive their decision in the mail, determine if they would like to proceed with the appeal process and gather supporting documentation.</p> <p>Allow email submission of appeal documentation.</p> <p><i>Accepted</i> – Agency has already implemented email document submission options.</p> <p>While not explicitly outlined in regulation, email is an acceptable method for submitting appeal documentation.</p>

	8 AAC 85.295 & 85.430	Current regulations impose immediate maximum rates on employers who miss even one quarterly payment, regardless of payment history. This punitive approach devastates seasonal businesses with cash flow variations. Recommendation: Implement graduated penalties based on: Payment history (first-time vs. repeat) Length of delinquency (30/60/90 days) Communication/payment plan participation Waive penalties for employers who self-report and correct errors	Fix Delinquent Account Penalties <i>Acknowledged – does not comply with statutory and federal requirements</i> AS 23.20.280(b) and Federal Unemployment Tax Act (FUTA) § 3302(b) mandate a penalty rate to employers missing quarterly reports or employers with a due of \$100 or more during the three-year rating period. The penalty rate is not imposed immediately. For example, the 2025 rating period is 07/01/2022 through 06/30/2024. 2025 rates were assigned 11/29/2024, providing employers over four months to resolve missing reports or payments. The agency offers deferred payment contracts (DPC). With a signed and approved DPC, the employer can make regular monthly payments to pay past contributions due, while staying current to prevent the account from receiving the penalty rate.
	8 AAC 85.260	Requiring physical bonds or securities for certain employers is an antiquated practice that ties up critical working capital. Recommendation: Accept electronic funds transfers, ACH authorizations, or credit card guarantees as alternatives to traditional bonds.	Eliminate Outdated Bond Requirements <i>Acknowledged – Risk to the unemployment insurance trust fund</i> The agency must protect the unemployment insurance trust fund and guarantee the security of a reimbursing employers deposit. Should a reimbursing employer become insolvent, non-payment may have negative effects on all Alaska employer tax rates, creating undue risk for other employers. While this method may require employers hold capital, reimbursing employers have lower unemployment costs overall if they have few layoffs and low turnover.
	8 AAC 85.280 & 85.320	Current regulations don't account for the unique nature of nonprofit and tribal employers, treating them identically to for-profit businesses. Recommendation: Create separate classification with reduced reporting requirements and alternative payment options for qualifying 501(c)(3) and tribal entities.	Update Nonprofit and Tribal Entity Rules <i>Acknowledged – Comment does not accurately describe the requirement</i> Unlike for-profit entities, AS 23.20.277 allows non-profit and tribal entities to be reimbursable, rather than a contributory employer assigned a tax rate. A reimbursable employer only pays their portion of the amount of unemployment insurance (UI) benefits former employees were paid. The option for non-profit and tribal employers to elect the reimbursable financing method is required under FUTA §3309(a)(2) for tribal governments and allowed under FUTA §3303(3) for non-profit entities. 8 AAC 85.280 is also an option that is not available to for-profit entities. This regulation allows multiple non-profit or tribal entities that are reimbursable to have a joint Employment Security Tax account, submitting wages and paying contribution due under one account.
	8 AAC 85.390	Current regulations regarding non-cash compensation are vague and create compliance uncertainty, particularly for businesses providing housing, meals, or other benefits. Recommendation: Publish clear valuation tables and safe harbor provisions that eliminate guesswork and reduce audit disputes.	Clarify "Remuneration in Medium Other Than Cash" <i>Acknowledged – Comment does not accurately describe the requirement</i> Non-cash remuneration for services performed is considered wages both under AS 23.320.530(a) and FUTA section 3306(b). 8 AAC 885.390 provides specific assigned values for housing and meals when the value of such has not been agreed to by a worker and their employer, or when the value is not included in union contracts or written agreements.
Workers' Compensation	8 AAC 45.081(e)	No practical reason for referencing an outdated Medicaid Preferred Drug List	WCD – <i>Accepted</i> to be incorporated. Regulation refers to an outdated reference.
Workers' Compensation	Not specific. Possibly 8 AAC 45.090 and .092	Consider allowing directed care to ensure specialists provide medical services to injured workers.	WCD - <i>Acknowledged</i> - Requires statutory change. Advocating for changes to AS 23.30.095 to allow for ER physician panels?
Workers' Compensation	Workers' Compensation Budget	The fragile state of the Workers' Comp Division finances results in reduced service related to the management of claims. Fairbanks office is being closed.	<i>Acknowledged</i> - The revenue sources to the Workers' Comp Division (outside of GF) need to be scrutinized and updated to reflect the current realities and address the past sweeping of funds, and how reduced premiums have reduced the division budget.
Workers' Compensation	Not specific	There are a number of areas where the burden of an injury falls disproportionately on the employer, impacting cost and ability to manage the claim.	WCD is <i>researching</i> for better understanding. There should be discussions about the fraud aspects of the system could be improved. The bar for holding an employee accountable for misrepresentations and outright lies is incredibly high. There are also instances where provider fraud occurs (including practicing outside of license areas), but they are still paid for the services. Additional area that would be of benefit in managing claims would be stronger language requiring providers to provide RTW status at the time of service whenever possible, not 14 days later (or sometimes longer).
Workers' Compensation		Concerns over use of Electronic Service.	WCD - <i>Accepted</i> to be incorporated. Suggests the Board consider using both electronic and USPS for delivery of documents.
Workers' Compensation		Comments on Electronic Service.	WCD - <i>Accepted</i> to be incorporated. Suggests an electronic opt-out and a choice of who receives, ER or TPA.

Workers' Compensation	8 AAC 45.052	Concerns arising from a recent Alaska Supreme Court decision on cross examination of medical evidence.	WCD - <i>Accepted</i> to be incorporated. Adjust the regulation to allow for filing of cross examination at any time as disputed evidence is filed.
Workers' Compensation	8 AAC 45.063	Calculation of time for mailing is unclear if email is used for communication.	WCD - <i>Accepted</i> to be incorporated. Amend the regulation to state plainly the time allowed for service, (extra three days or not).
Workers' Compensation	8 AAC 45.070	Defective ARH	WCD - <i>Accepted</i> to be incorporated. Affidavit for readiness filed before the 20-day answer period allowance for the employer being approved by the Board.
Workers' Compensation	Not specific	Complaints about access to Unemployment records of injured employees receiving benefits.	WCD – Researching for better understanding. It would be helpful to see if UI is being received as it is illegal and if the EE is job seeking as that goes toward medical stability.
Workers' Compensation	8 AAC 45.160	All parties must sign Agreed Settlements; this includes negotiated legal fees even if the attorney has been separated from the claim and EE.	WCD - <i>Accepted</i> to be incorporated. Change the regulation to allow for settlements on attorney fees to be approved without the EE signature.
Workers' Compensation	Fee Schedule	MPPR on payment for physical therapy services is unfair.	WCD – <i>Acknowledged</i> – requires Federal Law change. The American Physical Therapy Association has opposed the MPPR policy since CMS started applying it to "always therapy" services in 2011. The association continues to assert that it is a flawed policy, because the practice expense values for physical medicine CPT codes already have been reduced to avoid duplication during the valuation process.
Workers' Compensation	8 AAC 45.210	Questions on compensation rate.	WCD - <i>Accepted</i> to be incorporated. Formula does not match the current federal tax code.
DVR	No specific regulation cited	Okay. It's Dave, D-a-v-e, last name Berube, B-e-r-u-b-e, and I work here at the Disability Law Center of Alaska. Two comments or statements I want to make. For the public assistance benefits like SNAP and the allowances and TANF and all that, it's been in the past here, it's been taking a long time for folks to get them. There is a number of folks who want to work while they are waiting for those benefits, and it's important that they get them. So if there is a way to streamline that process, that would be great.	Streamline the process for SNAP and TANF <i>Acknowledged</i> - public assistance benefits are not related to DVR regulations.
DVR	No specific regulation cited	The other one is the long waitlist for the home and community-based waiver program for in-home supports and for supports for getting people to employment, employment places. A lot of folks rely on that type of support so they can get up and get ready and get to work and then come home after that. So that is a big long waitlist for that. If there is a way that can be cleaned up, that would be great. I don't have the regulation cites offhand unfortunately, but those would be the two biggest areas I see.	Address the waitlist for Home and Community-Based Waiver program <i>Acknowledged</i> - the waitlist for Home and Community Based Waiver program is not related to DVR regulations.
DVR	No specific regulation cited	Offhand from that, and this doesn't really affect the Governor to do anything about that, but another streamlining would be the application process for the DVR application process and getting things through a lot quicker for folks. It's been kind of arduous for some folks, and I know RSA has been looking at collecting data points from counselors, which in my opinion bogs down their efficient time to be working with clients on getting them the employment path that they want. Those are the areas that I wanted to talk about. Thank you very much for giving me this time.	Streamline the application process and data collection <i>Acknowledged; already implemented</i> - the division has already taken steps to streamline the application process. Data collection is required by the Rehabilitation Services Administration.
DVR	Article 1 8 AAC 98.300 <i>Federal citation: 34 CFR 361.10</i>	Align Individualized Plans for Employment (IPEs) with IEP transition plans to create unified, student-centered goals and timelines. Allow DVR to utilize existing educational assessments and records for eligibility and planning, reducing redundancy and administrative burden.	Aligning IPEs with IEPs <i>Acknowledged</i> - comment is not related to this regulation. However, suggestion has already been implemented. IPEs are already aligned with IEP transition plans; CFRs require the use of existing information whenever possible. Additionally, we already have a data sharing agreement with DEED.
DVR	Article 3 8 AAC 98.510 - 8 AAC 98.550 <i>Federal citation: 34 CFR 361.38</i>	Include a FERPA- and IDEA-compliant consent process that allows families to authorize secure data sharing between DVR and schools while protecting privacy. Provide accessible consent forms and clear explanations in plain language for families and students.	Modify consent forms <i>Acknowledged</i> - ROIs allow for communication between DVR and schools. The division's current consent forms have been approved by the Dept. of Law. We are in the process of making the current ROI fully accessible, and are moving towards accessibility statewide.

DVR	Article 4 8 AAC 98.600 - 8 AAC 98.630 <i>Federal citation: 34 CFR 361.57</i>	Require plain-language notices that clearly outline participants' appeal rights, deadlines, and steps. Permit email or online submissions of appeal requests to improve accessibility for rural residents and individuals with disabilities. Require DVR to confirm receipt of electronic appeals within three business days to ensure accountability and transparency.	Modify appeals notice and appeals process <i>Acknowledged</i> - the recommendations are already in place.
DVR	Article 5 8 AAC 98.700 <i>Federal citation: 34 CFR 361.36</i>	Clarify priority criteria and publish OOS status updates quarterly to improve transparency and public understanding. Permit time-limited exceptions for students nearing graduation or participating in work-based learning experiences to maintain service continuity.	Order of Selection suggestions <i>Acknowledged</i> - We do not communicate with the public about OOS unless we are in OOS. See state plan, Program-Specific Requirements for State Vocational Rehabilitation (Combined or General) Section G. No order of selection is being implemented at this time, and all eligible individuals will be served. CFRs guide the OOS process; OOS is based on priority category.
DVR	Article 6 8 AAC 98.990	Develop a model Memorandum of Understanding (MOU) between DVR, DEED, and LEAs that outlines referral processes, data-sharing protocols, and roles of each partner agency. Publish an annual Interagency Transition Outcomes Report summarizing referral rates, eligibility timelines, service coordination, and employment results. Establish a feedback mechanism for schools and families to share input on interagency coordination and service delivery improvements	Develop an MOU, publish transition report, and establish feedback mechanisms <i>Acknowledged</i> - Not related to the regulations. An MOU between DVR and DEED already exists. A feedback mechanism exists through Pre-ETS participant surveys and client satisfaction surveys.
DVR	General	1. Shared, Student-Centered Data Systems - Establish a secure, cloud-based platform that allows DVR and Local Education Agencies (LEAs) to share transition data, such as Pre-ETS participation, work-based learning outcomes, and transition readiness indicators. A unified system would streamline coordination, reduce fragmentation, and ensure continuity of services as students transition between education and employment systems.	Establish a cloud-based data-sharing system <i>Acknowledged</i> - ROIs allow us to share information between DVR and LEAs.
DVR	General	2. Defined Standards for Collaboration - Add regulatory language that defines "collaboration" as an intentional, ongoing process involving joint planning, shared goal setting, coordinated service delivery, and mutual accountability. This clarification would create consistent expectations across agencies and provide a foundation for evaluating interagency performance.	Add a definition the division does not feel that the addition of a definition of collaboration is necessary. <i>Acknowledged</i> -
DVR	General	3. Regular Interagency Outcome Reviews - Require annual or biannual cross-agency data reviews between DVR, DEED, LEAs, and community partners to examine outcomes, identify service gaps, and inform policy improvements. These meetings would promote transparency, continuous improvement, and shared responsibility for results.	Hold interagency outcome review meetings <i>Acknowledged</i> - Recommendation will be taken in to consideration but not added to regulatory language.
DVR	General	4. Joint Professional Development - Develop coordinated professional learning opportunities for DVR counselors, special educators, and transition specialists focused on data-informed decision-making, Pre-ETS implementation, and collaborative communication. Shared professional development would build capacity, consistency, and trust among agencies and staff statewide.	Offer joint professional development <i>Acknowledged</i> - Recommendation will be taken in to consideration but not added to regulatory language.
DVR	General	5. Use of Validated Collaboration Tools - Encourage adoption of evidence-based, student-centered tools—such as the Transition Readiness Toolkit—to measure progress in areas like job exploration, workplace readiness, and self-advocacy. Standardized, research-based assessments would improve data comparability and service quality across programs	Utilize collaboration tools <i>Acknowledged</i> - Recommendation will be taken in to consideration but not added to regulatory language.
Mechanical Inspections	8 AAC 90.162	Request for changes regarding the qualifications of Power Lineman Journeyman.	<i>Accepted</i> - These changes will be submitted with the regulatory recommendations.
Mechanical Inspections	General	Requesting Plumbing COF cycle align with UPC code cycle. Change from 2-3 year licensing.	<i>Not in Scope</i> - While this would be a very effective change, it requires change to statute.
		Request 1:1 ratio of plumber trainee to plumber journeyman ratio.	<i>Acknowledged.</i>
Mechanical Inspections	General	Change continuing education requirements from 2 years to 3 years to match code cycles.	<i>Acknowledged</i> - CE cycles are paired with renewal cycles that are established in statute.
Mechanical Inspections	General	Question regarding duration of trainee COFs.	<i>Acknowledged</i> - This is a procedural question and not a request for regulation change.
		Create a public database and separate applications into two parts.	<i>Acknowledged</i> - This request for a more extensive licensing database. This is under consideration but not a regulatory concern.
		Question regarding reciprocal and provisional licensing.	<i>Acknowledged</i> - This is a procedural question and not a request for regulation change.

		Request to require apprenticeship completion as part of the requirement for journeyman COF.	<i>Acknowledged</i> - While this would be a very effective change, it requires change to statute.
		Request for online portal for applications.	<i>Acknowledged</i> - This is a request for a more extensive licensing database. This is under consideration but not a regulatory concern.
		Request for online portal to communicate with applicant upcoming renewals.	<i>Acknowledged</i> - This is a request for a more extensive licensing database. This is under consideration but not a regulatory concern.
Mechanical Inspections	AS 18.60.320(a)	Request that certificate inspections be completed within the same calendar year as they are due.	<i>Acknowledged</i> - This is a Statutory change request.
	AS 18.60.320(a)	Request that inspection certificates be allowed to be maintained electronically.	<i>Acknowledged</i> - While the request is a change to statute, this may be in scope for a regulatory clarification.
	AS 18.60.350	Request change regarding suspensions and non-certificate blocking violations.	<i>Acknowledged</i> - Statutory change request.
	ASME code, API 510 and API 579	Request to use the most current edition of ASME and API.	<i>Acknowledged</i> - More specific language needs to define code adoption but this will be in the final change proposal.
	General	Requesting clarification of billing for Owner-User program certificates.	<i>Acknowledged</i> - This will be reviewed for addition into the final change recommendations.
	8 AAC 80.050	Spelling Correction	<i>Acknowledged</i> - This change will be added to the final submission.
	General	Request changes to tracer billing process.	<i>Acknowledged</i> - This will be reviewed for addition into the final change recommendations.
	8 AAC 80.900	Requested definitions.	<i>Acknowledged</i> - This change will be added to the final submission.
Wage & Hour	8 AAC 15.100	Remove references to “sick leave” and revert to regulation’s original purpose: calculating the rate of pay for <i>overtime</i> purposes.	<i>Acknowledged</i> - This would effectively double the regulatory burden, as the regulation would still be required to define ‘rate of pay’ for overtime and sick leave purposes, which remain unchanged.
	8 AAC 15.106	Limit count to employees working <i>in</i> Alaska.	<i>Acknowledged</i> - This would be counter to statute.
	8 AAC 15.108	Evaluate whether “paid time off accrues at a rate of not less than one hour for every 30 hours worked as an employee” overall in a year rather than on an hour-by-hour basis.	<i>Acknowledged</i> - This would be counter to statute.
	8 AAC 15.110	Create rate of pay standards based on what an employee would have earned had they worked rather than used sick leave, which in most instances is an already known figure that does not require a complicated formula that includes considering compensation an employee would not have earned during their absence.	<i>Acknowledged</i> - This is provided for in 8 AAC 15.100.
	8 AAC 15.112	Allow employers to request verification for an absence of <i>any</i> length if there is indicia, or a pattern, of leave misuse.	<i>Acknowledged</i> - This would be counter to statute.
	8 AAC 15.114	Distinguish “absence control” from “attendance incentive” policies, like the federal Family and Medical Leave Act (FMLA) does.	<i>Acknowledged</i> - This could be considered for a future regulation package. The sick leave regulations in effect as of September 25, 2025. The Department does not plan to act on these suggestions in 2026 as the regulation is only three months from having been implemented and not enough time has passed to assess the implications at this time.
	8 AAC 15.160	Ways to electronically comply with earnings statement requirement should be updated to reflect the modern, technologically sophisticated world we inhabit in which employers and employee have numerous ways to provide, or review, information electronically.	<i>Acknowledged</i> - This means of delivery is already accepted.
	General	Overall accrual cap for paid sick leave. For employers complying via an accrual-based system, cap overall accrual at double the applicable annual accrual cap. 23.10.066 uses the singular “following <i>year</i> ” rather plural “following <i>years</i> .” This is particularly necessary for employers complying with the paid sick leave law via an existing PTO policy, given end-of-employment payout requirements established by the Alaska Supreme Court. Without an overall accrual cap, these employers are effectively being treated worse than employers who never previously provided paid time off benefits to their employees (and likely are complying being a benefit that is less generous to employees like paid sick leave).	<i>Acknowledged</i> - The accrual cap is already addressed in the regulation. Will consider changes to remove plural from “years” in future amendments to eliminate confusion.
	General	Criteria to determine whether entity qualifies as “successor” under paid sick leave law. The law is silent on this issue, so businesses need guidance to determine whether they are a “successor” employer.	<i>Acknowledged</i> - This could be considered for inclusion in a future regulatory package. The sick leave regulations in effect as of September 25, 2025. The Department does not plan to act on these suggestions in 2026 as the regulation is only three months from having been implemented and not enough time has passed to assess the implications at this time.

	General	Upon adopting regulations, on its website the Department should identify public comments received, its response thereto, and why it accepted or rejected the comment. This would align with this proposal seeking ideas to “provide greater transparency with respect to standards, decision-making.”	<i>Acknowledged</i> - This is already a requirement of the regulatory process, and the information is published on the online regulatory posting page.
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