

# **Posttraumatic Stress Disorder (PTSD) Survey and Jurisdictional Review**

*2025 Report to the Legislature*

**June 2025**

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## Background

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In 2024, Engrossed Substitute Senate Bill (ESSB) 5950 provided funding to the Department of Labor & Industries (L&I) to contract with a third-party vendor. The budget proviso stipulated “\$200,000 of the accident account—state appropriation and \$200,000 of the medical aid account—state appropriation are provided solely for the Department of Labor & Industries to contract with a third-party vendor to produce a study that assesses posttraumatic stress disorder (PTSD) related workers' compensation policies and claims in Washington and other states. The intent of the study is to inform the department on policy and best practices that improve worker outcomes for law enforcement officers, firefighters, and nurses. The department shall submit a report describing the outcomes, best practices, and recommendations to the governor and appropriate legislative committees by June 30, 2025.”

Washington law currently allows workers' compensation claims for PTSD in several different ways:

- For all workers, PTSD may currently be covered as an occupational **injury**; for example, when a worker is exposed to a single traumatic event that causes them to develop PTSD.
- For public safety telecommunicators (911 operators), a PTSD claim may be covered as an occupational **injury** or an occupational **disease** (wherein exposures over time, rather than a single incident have resulted in the condition). The worker has the burden to demonstrate that it is caused by work. There is no presumption that PTSD is caused by work.
- For firefighters, fire investigators, emergency medical technicians (EMTs), law enforcement officers, and direct care registered nurses, PTSD may be covered as an occupational **injury** or an occupational **disease** and there is also a **presumption** that PTSD is caused by work. A presumption shifts the burden to the employer to prove the condition is not work-related.

The PTSD presumption for firefighters and law enforcement officers was enacted in 2018; EMTs and fire investigators were covered by presumption in 2019; and direct care registered nurses were covered by presumption in 2024. As a result, the number of PTSD claims have increased since 2018.

When compared with claims in general, PTSD claims have resulted in fewer successful return-to-work (RTW) outcomes for workers, prolonged disability, and higher frequency of industrial insurance pensions. These outcomes have human and system costs. Workers have higher morbidity, reduced lifetime earnings, and reduced quality of life.

PTSD claims have significantly contributed to increased current and projected premium rates in the affected industries.

MasDyne Research, LLC (MasDyne), the third-party vendor selected in response to the budget proviso, performed an extensive survey and jurisdictional review that culminated in a report with several recommendations. L&I reviewed each of the MasDyne recommendations for relevance and feasibility for the Washington state workers' compensation system and laws.

In this legislative report, L&I describes the recommendations provided by MasDyne and outlines in additional detail those recommendations that were in alignment with current Washington state workers' compensation efforts and future opportunities for improvement. Each of these recommendations is designed to ensure proper and necessary care, improve RTW outcomes, and enhance support for care providers in Washington state. Taken together, these changes are expected to improve worker-centric care while also addressing employer concerns related to rising premiums, especially for public sector employers in the workers' compensation system.

## **MasDyne PTSD Survey and Jurisdictional Review: A Broad-Spectrum Analysis of PTSD across Workers' Compensation and Comparable Systems**

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L&I engaged in a contract with MasDyne to compare and contrast benefits, policies, and practices across jurisdictions in the United States and internationally. These jurisdictions represent both workers' compensation and non-workers' compensation systems, including the Veterans Administration. The MasDyne Survey and Jurisdictional Review of PTSD (referenced as the MasDyne Report in this document) included 45 key informant interviews, a review of 1,175 secondary sources with 483 cited in the report, and an analysis of Washington's L&I PTSD-related claims data.<sup>1</sup>

Key informant interviews consisted of PTSD experts and researchers, clinicians, claims adjudicators, attorneys, workers' compensation administrators and medical directors, employers, vocational specialists, policymakers, and public safety representatives. Semi-structured interviews were conducted to elicit firsthand insights into systemic challenges such as administrative delays, coordination barriers, and RTW constraints. Interviews also uncovered emergent practices or innovations not yet reflected in policy.

Secondary sources included PTSD-relevant (1) legislation; (2) policies; (3) clinical practice guidelines; (4) industry resources (e.g., Workers' Compensation

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<sup>1</sup> Statistical discrepancies between the data included in the MasDyne Report and those reported by L&I reflect differences in analytical methods (e.g., grouping less prominent presumption codes into a single category for reporting purposes) and/or dataset time periods.

Research Institute and National Council on Compensation Insurance); and (5) publications including research studies and systematic reviews.

Analysis of Washington's L&I PTSD-related claims<sup>2</sup> included data between June 7, 2018, and November 26, 2024, comprising 1,966 PTSD-related claims, of which 1,595 (81%) were allowed, 349 (18%) were rejected, and 22 (1%) were pending. Among the allowed claims, 585 (37%) involved a PTSD presumption code.<sup>3</sup> Although the majority of these claims (87%) were among firefighters and law enforcement officers, the remainder came from other occupations including EMTs and direct care registered nurses. Notably, the MasDyne Report is heavily weighted toward qualitative analysis (i.e., interviews and secondary sources) rather than quantitative analysis.<sup>4</sup>

The overall intent of the MasDyne Report was to inform L&I on policy and best practices designed to improve worker outcomes for law enforcement officers, firefighters, and nurses. This L&I report to the Legislature describes the MasDyne Report recommendations taking into consideration several factors:

- the quality and rigor of the evidence;
- anticipated improvements for workers, the workers' compensation system, and other key stakeholders and partners;
- efforts already underway at L&I;
- promising ideas L&I considers feasible to implement; and
- other improvements that would require statutory changes and funding.

The MasDyne Report is [available here](#).

## Survey and Jurisdictional Review Findings and Recommendations

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This section includes recommendations from the MasDyne review that were identified as feasible to implement in Washington state workers' compensation for law enforcement officers, firefighters, and nurses. Although the MasDyne Report did not reveal many current evidence-based programs or practices, it did highlight options for future consideration and potential implementation. The MasDyne recommendations for L&I to consider are:

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<sup>2</sup> PTSD-related claims include allowed PTSD claims and contended PTSD that was not accepted on a claim.

<sup>3</sup> The MasDyne Report data include all PTSD-related claim categories (single exposure, occupational disease, and presumption claims).

<sup>4</sup> MasDyne was unable to perform comparative analyses across jurisdictions due to data access challenges.

1. Expand and retain a trauma-informed provider workforce by reducing administrative burdens, incentivizing participation, strengthening legal protections, and establishing academic and workforce development partnerships.
2. Enhance provider training and engagement by introducing structured onboarding, creating PTSD-specific medical-legal certification pathways, and incentivizing providers for completing training and producing high-quality documentation.
3. Strengthen systems coordination by launching integrated case management teams, embedding licensed mental health professionals in claims units, and establishing phased return-to-work pathways supported by multidisciplinary collaboration.
4. Establish standardized diagnostic protocols aligned with evidence-based standards and administrative requirements, while improving documentation and assessment consistency.
5. Establish an independent navigator program to guide and support claimants through the system, streamline PTSD claims processing, adopt trauma-informed communication and navigation tools.
6. Develop trauma-informed return-to-work reintegration protocols, offer incentives for transitional duty and sustained accommodations, and pilot post-return monitoring to support durable recovery and track success factors.
7. Enable early, provisional access to mental health care before and during claim investigation, and implement structured evaluation frameworks to assess and support the adoption of evidence-based early intervention and mitigation approaches.
8. Modernize PTSD data systems through standardized documentation, digital coordination platforms, centralized access, and embedded monitoring to enable real-time communication, systematic evaluation, and cross-jurisdictional research.

These recommendations from MasDyne include ways that L&I can look internally for efficient ways to build on **current efforts** with existing resources. At the same time, L&I will explore **recommendations** that may be implemented with current resources in **collaboration with partners and stakeholders**. The Workers' Compensation Advisory Committee (WCAC) and its PTSD Subcommittee will be key partners in this work. Finally, **recommendations requiring statutory changes or new funding** are included in this report.

## Current efforts

The MasDyne recommendations included many current efforts already underway in Washington workers' compensation. L&I has implemented several initiatives to improve

outcomes for workers with PTSD claims. Below are examples of current work aimed at improving access to high-quality services, streamlining the claims process, and creating pathways for supported and early RTW.

- Effective July 1, 2025, L&I is implementing legislation for psychologists to serve as Attending Providers in the case of claims solely for mental health conditions. This is intended to further improve access to trauma-informed care.
- L&I is collaborating with an expert subcommittee of the Industrial Insurance Medical Advisory Committee (IIMAC) to develop the Washington State Department of Labor & Industries Clinical Guideline for Posttraumatic Stress Disorder (PTSD). Target completion date is fall 2025. The evidence-based clinical recommendations within the PTSD Clinical Guideline will establish L&I policy.
- L&I has engaged in marketing efforts and enhanced communication with all psychologists in Washington state to increase access to care. This has included emails, phone calls, virtual meetings, and Question & Answer sessions. Future efforts can be expanded to include psychiatrists, psychiatric advanced practice registered nurses, and master's level therapists.
- L&I telehealth policies already in place may improve access to appropriate providers with expertise in trauma-informed care.
- L&I currently has designated senior claims management staff who assess and manage PTSD claims from initiation to closure.
- L&I offers consistent training and tools, graduated RTW strategies, and employer incentives to facilitate and accommodate worker-centric RTW options. Incentives were significantly expanded by the Legislature and implemented by L&I on Jan. 1, 2025. L&I encourages employers to access these incentives.
- L&I has identified and validated a base set of PTSD data elements and established a schedule for producing a data-driven report. This baseline will be used to consistently evaluate PTSD-relevant practices and programs. This was part of the L&I PTSD Project that included the MasDyne Report.

### **Recommendations that may be implemented within current resources to explore with partners and stakeholders**

L&I recognizes that current efforts alone may not be enough to help workers and employers with the challenges of PTSD. The MasDyne Report revealed several efforts being tested across the country, some of which may be considered for testing and evaluation in Washington state. L&I will explore such changes to policies and practices while maintaining the commitment to evidence-based, trauma-informed foundational principles.

L&I currently benefits from the expertise and engagement of highly committed partners and stakeholders. Continuing, and strengthening, these collaborations will be essential to identifying, prioritizing, implementing, and learning from innovative strategies and practices implemented over the next few years. Below are examples of recommendations in the MasDyne Report that can be implemented within current resources with external stakeholder partnership:

- Identify and establish partnerships with additional mental health providers who have expertise in trauma-informed care.
  - Ways to encourage partnership include reducing administrative burden and time delays, and creating structured onboarding for new mental health providers.
- Expand the designated senior claims management staff to a dedicated Specialized Claims Team for PTSD claims. This Specialized Claims Team will include embedded mental health expertise to facilitate coordinated claim management; implement the new L&I PTSD Clinical Guideline; and deliver effective RTW planning and support.
- Enable policy changes to facilitate best practices in alignment with the PTSD Clinical Guideline, which is currently in development.
- Evaluate PTSD-related strategies and programs including:
  - adherence to the PTSD clinical guideline;
  - employer engagement in trauma-informed wellness and safety initiatives;
  - employer acceptance and involvement in flexible worker-centric RTW options; and
  - internal workflows, processes, and worker navigation.

### **Recommendations requiring statutory changes and/or new funding**

The MasDyne Report identified several short-, medium-, and long-term challenges and opportunities. Each of these can improve the responsiveness and quality of PTSD services and support, as well as the outcomes that workers and employers experience. Actions taken in the short-term, if observed and reviewed for lessons learned, will help L&I understand how to move forward effectively and efficiently. Below are examples of the types of investments and statutory changes that would be necessary to implement further recommendations from the MasDyne Report:

- Develop a Network of Excellence that enables timely access to trauma-informed experts, as well as a mechanism for referral to these experts.
- Allow mental health providers to perform services within their scope of practice that are not currently allowed in the workers' compensation system. Currently, limitations are placed on some types of mental health providers. These limitations exist in law, rule, and/or policy.



- Fund early employer engagement and supportive programming to facilitate worker success in RTW.
- Create and hire worker navigators— one or more individuals who are trained in workers' compensation and trauma-informed care — to engage and support workers who are exposed to trauma and require assistance.
- Create and hire new positions — a psychologist and a psychiatric advanced practice registered nurse — with expertise in PTSD and general mental and behavioral health.
  - Together with the Associate Medical Director (AMD) for Psychology, these positions could provide leadership for the new Specialized Claims Team. These leaders may also provide the clinical expertise essential for policy development and training and education for L&I staff, mental health services providers, and other partners and stakeholders.
- Allow early and provisional access to mental health treatment prior to claim allowance.
- Contract with a research group with expertise in occupational health program evaluation to propose and execute relevant research studies to help inform the Washington workers' compensation system.
- Offer Continuing Education (CE) credits for mental health providers, perhaps in partnership with academic institutions or other organizations. These could focus on workers' compensation; treating workers; and diagnosis, assessment, treatment, and functional recovery for PTSD.

## Conclusion

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This report to the Legislature responds to the 2024 legislative mandate to contract with a third-party vendor to inform the Department on PTSD policy and best practices. The purpose of the contract was to perform a broad-based review and offer recommendations to improve worker outcomes for law enforcement officers, firefighters, and nurses with PTSD-related workers' compensation claims. This report to the Legislature is intended to describe the MasDyne recommendations that are feasible to implement in the Washington workers' compensation system.

The report describes efforts and strategies that are underway, along with plans for continuation and improvement. In addition, several recommendations from MasDyne are identified that may enhance provider engagement, improve claims processes, and amplify partnerships with our most important stakeholders — workers and their employers. Lastly, the MasDyne Report identified further changes to enhance the overall system that will require statutory changes and fiscal investment.

L&I is looking first for efficiencies internally that can propel this work forward. Agency policies and practices can be changed to improve worker outcomes, promote system sustainability, and strengthen public trust.

Active collaboration with stakeholders is essential to making needed progress. Promising approaches and strategies will be explored and tested in partnership with stakeholders, including the WCAC.

L&I will continue to identify and implement positive changes in its approach to PTSD that are within its authority and control, and to understand and test new, innovative approaches and strategies. Learning is inevitable and welcomed.

L&I appreciates the Legislature's support and partnership as it strives to improve the lives of workers in Washington state.