



STATE OF THE WORKER REPORT

September 2025

LETTER FROM THE COMMISSIONER

A STRONGER FUTURE FOR OREGON WORKERS

This year marks my third Labor Day as Commissioner of the Bureau of Labor and Industries, and it feels different. After decades of underinvestment, the Governor and Legislature made a clear choice: fund the agency that enforces our wage, hour, and civil rights laws so those rights are real, not theoretical. With this budget, BOLI finally has the capacity to begin meeting the scale of our responsibility.

This investment is a vote of confidence. It's also a mandate. We are hiring investigators, modernizing our systems, and establishing performance standards so workers and employers see timely, consistent results. Our commitment is simple: when an Oregonian is shorted pay, discriminated against, or seeking a pathway into a living-wage career, they can count on the Bureau to help.

We know the work ahead is serious. Complaints have reached record levels. Long existing backlogs grew, as we stated they would. Federal actions created new uncertainty for workers and their families and more work for the Bureau. But Oregon didn't stand still. Together with labor, business, lawmakers, and community partners, we chose to rebuild. That's what this report is about: where we were, what's changed, and what we must do to ensure that Oregon laws continue to be meaningful for decades to come.

Thank you for your trust. We intend to keep earning it, case by case, worker by worker.

With gratitude,

Christina Stephenson (she/her)
Labor Commissioner
Bureau of Labor and Industries



ABOUT THE BUREAU

In 1903, The Oregon Legislature established the Bureau of Labor and Industries (BOLI) during an era of significant industrial transformation across the United States.

Founded on the belief that government intervention could improve conditions for workers while maintaining social stability, BOLI's early mission included enforcing laws related to child labor, women's work hours, and factory safety. This foresight helped Oregon avoid the worst of the labor strife seen in other states and paved the way for a robust system of labor protections that has continued to evolve for more than a century (see [BOLI: 120 Years of Service to Working Oregonians](#).)

Led by Labor Commissioner Christina Stephenson, the Bureau of Labor and Industries protects workers' rights through enforcement of state labor laws, ensures access to housing and public accommodations free from discrimination for all Oregonians, and promotes the development of a highly skilled workforce through registered apprenticeship programs.

Since assuming office in January 2023, Commissioner Christina Stephenson has focused on ensuring BOLI is a proactive, sustainable, and inclusive agency. A key priority for the Stephenson Administration has been the investigation backlogs in both the Wage and Hour Division (WHD) and the Civil Rights Divisions (CRD). **Because Commissioner Stephenson knows that when Oregonians can't enforce their rights, they aren't rights at all.**

BOLI OPERATES ACROSS THREE MAIN DIVISIONS :

WAGE & HOUR

This division oversees wage claims, investigates workplace law violations such as wage theft, and enforces Oregon's prevailing wage laws on public projects.

CIVIL RIGHTS

This division enforces anti-discrimination laws and ensures that all workers have equal opportunities, regardless of race, gender, disability, or other protected status.

APPRENTICESHIP & TRAINING

This division develops and supports registered apprenticeship programs, helping workers acquire valuable skills and earn while they learn.

ABOUT THE COMMISSIONER

Christina Stephenson is Oregon's 11th Labor Commissioner. Born and raised in rural Oregon, her work ethic was formed by watching her parents grow and sustain a small business for several decades. Christina went on to own and operate her own business - a law practice where she represented workers who experienced discrimination or harassment in the workplace and helped businesses comply with Oregon's workplace laws. Now, her mission is to ensure Oregon workers have access to their civil rights and that Oregon businesses have access to the skilled workforce they need.

HISTORIC INVESTMENT

THE LARGEST BOOST TO BOLI IN A GENERATION PUTS RIGHTS INTO ACTION

After decades of chronic underinvestment, BOLI has been operating with severe capacity constraints and a growing backlog of wage and civil rights complaints. In October 2024, the agency was forced to implement triage measures, including an income threshold for wage claim investigations, in recognition that the agency could not effectively help the many Oregonians accessing the Bureau.

When we launched a new online portal in 2024, the picture became even clearer: 66% of workers filing with the agency reported economic hardship tied to their case. Families told us they were choosing between rent and groceries while waiting for their wages. Justice delayed was hurting the very people who could least afford it.

Our staff and systems had been stretched past the breaking point by years of underfunding. In the early 1980s, BOLI had 214 staff serving Oregon's workforce of 1.2 million. Although the current workforce is more than 2.1 million Oregonians, BOLI entered the 2025 legislative session with just 150 staff.

The result was unmanageable backlogs across all three of our enforcement divisions:

- Wage & Hour: 208% increase in claims since 2020, with many workers waiting up to two years for resolution.
- Civil Rights: 3,515 case questionnaires pending.
- Apprenticeship & Training: Almost 100% behind on federally required compliance reviews.

Behind every case in our backlog is an Oregonian waiting to be made whole. When someone goes years without a paycheck they earned, the consequences are devastating. Families fall behind on rent. Parents struggle to put food on the table. Communities lose trust in the protections they should be promised by law.

An analysis by Rutgers University's Workplace Justice Lab estimated that Oregonians lost between \$283 million and \$405 million in minimum wage violations alone. Yet even when BOLI confirms violations, we struggle to collect: in the past eight years, more than 40% of wages and penalties ordered, nearly \$5 million, went unrecovered.

In 2025, BOLI put forward a bold, solutions-oriented budget package to rebuild capacity, modernize systems, and restore Oregonians' access to enforcement. Our request was grounded in data, urgency, and equity, and it was met with overwhelming support from the Governor, labor, business, the media, and the public. Lawmakers responded with a historic investment.

Implementation is underway. BOLI is onboarding staff, upgrading case management technology, and operating with new performance metrics that track screening times and case resolution. Two big goals: clear the intake backlog by 2027 and resolve the investigation backlog by 2029. Along the way, we will report progress publicly and adjust staffing, training, and technology to hit targets.

With this funding, BOLI will:

- Lift the wage claim income threshold by the end of 2025, ensuring all workers regardless of income can file claims and have them fully investigated;
- Hire more staff and reduce critical backlogs;
- Begin restoring the agency to a baseline level of service on par with its statutory responsibilities and with peer agencies.

"Being forced to institute the wage threshold, only being able to take claims from Oregonians in the most challenging financial situations, was the most difficult decision I've had to make in office. Removing the threshold by the end of 2025 because the Legislature invested in the Bureau's capacity and recognized that all Oregonians deserve to have their rights enforced will be a significant step forward.

-Commissioner Stephenson

This is a significant first step forward and we are proud of what we achieved. But the job isn't finished. The final budget fell short of fully funding the agency and securing permanent funding separate from the general fund. Without filling in the gaps and establishing an additional funding source, the Bureau will continue to be subject to the ebbs and flows of available funding through the general fund that led to this crisis and will not be able to sustain equitable, timely enforcement. That's why we're committed to working with stakeholders, the legislature, and the Governor to solidify an additional funding source during the 2026 legislative session.

This is a shared victory and a shared responsibility. We look forward to continuing this work with the Legislature and stakeholders next session to fulfill the promises we've made to Oregonians.

STATE OF THE WORKER

Oregon has some of the strongest worker protection laws in the country. In the 2025 session, lawmakers passed a range of bills impacting workers and employers, from expanded civil rights protections to new wage and hour requirements. To help Oregonians stay informed, BOLI has launched a [New Laws webpage](#) where everyone can track what is changing and when new laws take effect. Below is a summary of the major changes from the 2025 session.

IN EFFECT LABOR DAY 2025

HB 2541
May 7, 2025

Extends lactation protections to covered agricultural workers—reasonable breaks and a private space that isn't a restroom.

HB 2957
June 24, 2025

Protects access to courts by prohibiting contracts that shorten statutes of limitation for civil rights claims within BOLI's authority; clarifies timelines tied to BOLI notices.

EFFECTIVE SEPTEMBER 26, 2025

SB 69

Aligns OFLA, Paid Leave Oregon, and sick time; clarifies sick-child leave and public-health coordination.

HB 3187

Reduces age bias by limiting when employers can request age/birth/graduation dates.

SB 1176

Reinforces cash-acceptance in public accommodations; directs BOLI to conduct ongoing education.

HB 2248

Establishes Employer Assistance as a formal division; protects good-faith reliance on guidance; formalizes settlement authority.

HB 2688

Updates "public works" definition for prevailing wage to include certain bespoke off-site activities ([see timelines](#)).

EFFECTIVE JANUARY 1, 2026

SB 906

Requires new-hire information on pay periods, rates, deductions, benefits; BOLI template forthcoming.

SB 426

Creates liability for certain unpaid construction wages (owner/contractor).

SB 1108

Allows employees to use sick time for blood donation.

SB 731

Ensures ASL users receive the same bilingual differential in public sector roles.

SB 808

Extends veteran preferences to Oregon National Guard members.

HB 3550

Exempts minor-league pro baseball players covered by a CBA from specific wage/OT/meal-rest rules.

SB 968

Allows limited recoupment of certain wage overpayments within 364 days with notice.

THE WORK IS UNFINISHED



**22 Bills with
Fiscal Impact
on Agency in
2025**
**19 Passed
Without
Funding**

Each legislative session, the Oregon Legislature passes new laws to expand protections for workers and hold employers accountable. Many of these laws add to BOLI's enforcement responsibilities, from strengthening wage and hour protections, to expanding civil rights enforcement, to growing registered apprenticeship programs.

But while lawmakers regularly acknowledge the importance of this work, the funding needed to implement these laws is often left behind. The result: Oregonians are promised protections that the Bureau does not have the staff or resources to fully deliver. New laws expand rights, but enforcement takes people, time, and outreach. Some bills, like reinforcing cash acceptance, task BOLI with public education, but without dedicated resources.

THE 2025 SESSION SAW DOZENS OF BILLS TASKING BOLI WITH NEW RESPONSIBILITIES, MANY OF WHICH BOLI ESTIMATED WOULD HAVE REQUIRED ADDITIONAL POSITIONS AND FUNDING:

46 bills were tracked as having a direct impact on BOLI operations, 22 of which passed the legislature.

Of the 22 bills that passed, BOLI estimated that 10 bills had a substantial impact and 12 bills had a minimal fiscal impact.

The Legislature funded three of the 10 bills with four positions, declining to fund seven bills and 8 positions.

This mismatch between new protections on paper and resources allocated to the Bureau creates a dangerous gap: Oregonians believe their rights are protected under new laws, but the enforcement capacity doesn't exist. BOLI will track the workload associated with unfunded protections and ask the Legislature to fund them should there be an impact. Along with being overly reliant on general fund, this misalignment between new laws that the Bureau is intended to educate and enforce without accompanying resources is a contributing factor to situation that led to the backlogs we're facing today.

PROTECTING **ALL WORKERS**

At a time when federal worker protections and civil rights enforcement face ongoing turmoil, Oregon cannot afford to leave its workers unprotected. BOLI stands as the state's front line of defense, ensuring that no matter what happens in Washington D.C., Oregonians have strong, reliable enforcement of labor standards and civil rights laws.

IMMIGRATION-RELATED RETALIATION

BOLI enforces workplace protections for all workers in Oregon, regardless of immigration status. Retaliating against someone for reporting wage theft, unsafe conditions, or discrimination, by threatening to call immigration authorities is illegal under state law. These cases are especially urgent: when one worker is silenced, entire workplaces are chilled into silence. That's why BOLI has made immigration-related retaliation a top enforcement priority.

We've taken several important steps to strengthen protections for immigrant workers and ensure employers understand their responsibilities. We issued **enforcement guidance** to the employer community clarifying that national origin discrimination and immigration-related threats are unlawful. To empower workers, we produced **"Know Your Rights" materials** in multiple languages, launched **"No somos inmigración / We are not immigration" stickers** for investigators' business cards, and **posters** in our lobby so workers know BOLI is a safe resource. We also hosted the first in a series of trainings on *Immigration Enforcement: What Oregon Employers Need to Know*, which was attended by over 300 employers. This work makes clear: Oregon law protects every worker, and intimidation will not be tolerated.

"Intimidating and silencing workers who simply want to be treated fairly by threatening or actually calling immigration officials on them is one of the most egregious forms of retaliation. The Bureau will prioritize these cases as they can have a significant chilling effect on the workplace and will use every enforcement tool available to ensure that if employers are found to have violated the law in this way, they are held accountable to fullest extent of the law."

-Commissioner Christina Stephenson

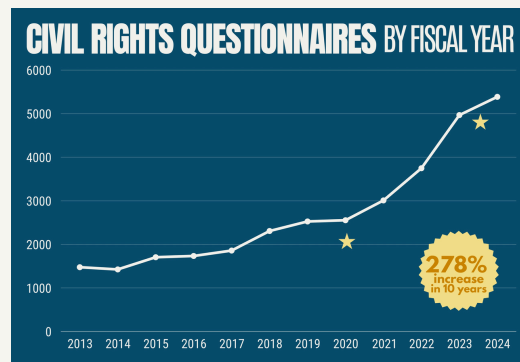
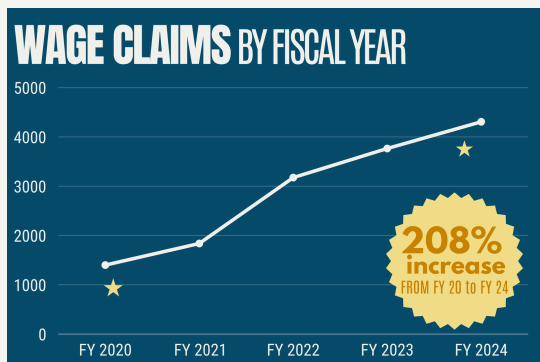
ENFORCING ALL WORKER PROTECTIONS

Over the past year, BOLI remained vigilant in monitoring changes at the federal level and ensuring that Oregonians did not lose critical workplace protections. When it became clear that the Equal Employment Opportunity Commission (EEOC) would only selectively enforce gender identity protections, narrower than the law allows, BOLI reaffirmed its commitment to fully enforcing Oregon's anti-discrimination laws. The agency emphasized that all Oregonians would continue to receive the full protection of state law, regardless of shifting federal landscapes. To safeguard workers' rights, BOLI strengthened its outreach and public guidance, updated materials to make clear that complaints would be thoroughly investigated, and worked with community-based organizations to ensure workers knew the benefits of filing directly with the state. Staff also reviewed potential gaps in federal remedies and monitored dual-filed cases to prevent Oregonians from losing access to protections. This approach reflects BOLI's broader strategy: staying alert to federal developments, adapting quickly, and ensuring that Oregon workers are never left behind when federal agencies refuse to enforce laws on the books.

BACKLOG UPDATE

PROGRESS ON ONE OF BOLI'S TOUGHEST CHALLENGES

Last year, BOLI reported significant case backlogs across nearly every division. These delays were more than numbers on a page; they meant Oregonians waiting months or even years for stolen wages to be returned, for civil rights cases to be heard, or for apprenticeship programs to be evaluated.



We made a commitment to tackle those backlogs head-on and prioritized every possible change that could be made without additional funding. To that end, BOLI has taken aggressive steps to move cases faster. By streamlining intake, deploying staff where they're most needed, and leveraging technology, we've already started to reduce some backlogs and speed up resolutions.

At the same time, the challenge is far from over. Backlogs in one area move to the next as the case makes it through the process, and sustainable progress requires sustained resources. For example, after a successful push to decrease our backlog in the intake stage of our Wage and Hour Division, all of those cases were moved to an investigations backlog. We anticipate seeing the same pattern in civil rights in the coming years that will lead to a civil rights investigation backlog that will need to be addressed by increased staffing. That's why we're tracking and reporting numbers publicly: transparency is critical to earning and keeping the confidence Oregonians place in us.

August 2024	
WAGE & HOUR	CIVIL RIGHTS
Intake Backlog: 4,074	Questionnaire Backlog: 3,515
Investigations Backlog: 1,341	

August 2025	
WAGE & HOUR	CIVIL RIGHTS
Intake Backlog: 1,997	Questionnaire Backlog: 3,277
Investigations Backlog: 2,302	

BOLI has used every tool at its disposal to manage backlogs without additional staff, making modest shifts in intake and investigation queues. We look forward to reporting real, sustained progress as new staff come on board, reducing wait times for Oregonians who turn to the agency for help.

WHERE WE ARE HEADED

Our public targets remain ambitious but clear:

- Civil Rights Intake Backlog cleared by mid-2026
- Wage and Hour Intake backlog cleared by mid-2027
- Wage and Hour Investigation backlog cleared by mid-2029

These goals are achievable with the historic investments coming online in late 2025 and early 2026, including dozens of new staff, and a modern case management system by 2028. Until then, we'll keep doing everything in our power to shorten timelines and resolve cases more quickly, because justice delayed is justice denied.

Building Trust Through Transparency, Fairness, and Accountability

GOOD GOVERNANCE

Oregonians count on BOLI not only to enforce laws, but to do so fairly, consistently, and in ways that strengthen trust in government. Good governance means being clear about how we interpret the law, offering tools that prevent conflict before it starts, creating pathways for resolution when disputes arise, and modeling the workplaces we want to see across the state. In 2025, BOLI invested in several initiatives that strengthen accountability and accessibility for workers, employers, and the public.

Enforcement Guidance Library

BOLI now provides an online library of guidance, opinion letters, factsheets, FAQs, and final orders to help everyone understand how employment laws are enforced.

- Guidance documents explain how BOLI interprets specific laws.
- Opinion letters provide clarification on unique scenarios raised by Oregonians.
- Final orders demonstrate how the law is applied in practice.

These resources are designed to promote compliance and transparency. They do not replace legal advice, but they make it easier for employers to follow the law and for workers to know their rights. This effort dovetails with BOLI's successful effort with HB 2248 (2025) to formalize an Employer Assistance Division.

Hospital Staffing Enforcement

With the passage of HB 2697 (2023), Oregon created new protections for hospital workers. Beginning June 1, 2025, BOLI enforces new break requirements under ORS 653.258.

In response, the Wage & Hour Division:

- Built training modules and internal processes.
- Partnered with the Oregon Health Authority for consistent oversight.
- Established clear complaint intake and enforcement pathways.

This work ensures hospital employees who care for Oregonians every day have their own rights protected at work.

Alternative Dispute Resolution (ADR) Program

Launched in 2025, BOLI's new ADR Team offers free, confidential mediation to resolve workplace, housing, and public-accommodation disputes.

Mediation provides:

- A safe, neutral space to resolve conflict.
- Faster, more flexible solutions than litigation.
- Durable agreements created by the parties, not imposed by the agency.

BOLI mediators are impartial facilitators, focused on communication and problem-solving. Outcomes often include solutions beyond what a court could order, supporting repair and closure for both parties. Since launching the program, the ADR Team has helped negotiate more than \$2 million in settlements for Oregonians.

Leading By Example with Employee Resource Groups (ERGs)

Good governance and inclusivity start at home. BOLI has invested in an Employee Resource Group (ERG) program to model workplaces that are inclusive, honor and appreciate diversity. ERGs provide formal spaces for staff who share identities or experiences—such as Latino/x, Black/African American, LGBTQIA+, and Women—to connect, advise leadership, and foster inclusion. Additional ERGs are in development as the program grows.

Oregonians deserve a fair, just, and equitable employment landscape where every worker is respected, protected, and empowered to thrive. At BOLI, we are committed to making this vision a reality by using every tool at our disposal—from strategic enforcement to modernized services and expanded access to resources. We are also committed to securing sustainable funding now that we are expanding our capacity, adding more mediators, investigators, and staff to ensure timely justice for all workers. Our goal is to eliminate exploitation, discrimination, and wage theft while providing employers with the support they need to create safe, fair workplaces. With a clear focus on fairness and accountability, BOLI will continue working tirelessly to ensure that Oregon remains a place where workers can count on their rights being upheld and where economic opportunity is available to all.



**WORKING TO CREATE
AN EMPLOYMENT LANDSCAPE THAT
OREGONIANS DESERVE**