



**Act No. 184 (2024) Report:
Vermont Firefighters and Cancer-Related
Workers' Compensation Claims
January 30, 2026**

**Submitted by:
Kaj Samsom, Commissioner of Financial Regulation**

Executive Summary

Section 13 of Act 184 (2024) directed the Department of Financial Regulation (DFR) to biannually report to the Senate Committee on Economic Development, Housing, and General Affairs and the House Committee on Commerce and Economic Development on cancer-related workers' compensation claims filed by Vermont firefighters. DFR collected claims data for Vermont, but much of the requested nationwide data remains uncompiled and unavailable through any channel at this time. A link to relevant policy analysis published by the National Council on Compensation Insurance is provided.

Background

This report follows an initial legislative report submitted in January 2024 pursuant to Section 3 of Act 26 (2023), submitted by DFR jointly with the Department of Labor.¹ The 2024 report addressed the question of expanding coverage for firefighters by broadening presumptions regarding causality, expanding the types of cancers covered, and additionally discussed the apportionment of liability when a firefighter has been employed by multiple departments. The 2024 report concluded that estimating the potential impact of changes to current statutes was significantly impeded by the lack of critical demographic and claims data for firefighters. Section 13 of Act 184 (2024), under which the present report is submitted, was intended to obtain additional data that was not available for the 2024 report.

Data Collected in Response to Section 13(a) of Act 184:

Pursuant to Act 184, Sec. 13(a), the Commissioner of Financial Regulation reports the following (DFR response italicized):

(1) the number of workers' compensation claims for cancer that were submitted by Vermont firefighters in the previous 24 months:

Vermont Firefighters submitted nine (9) workers' compensation claims for cancer between October 1, 2023 and October 1, 2025.

¹ Michael Harrington and Kevin Gaffney, *Act No. 26 (2023) Report: Workers' Compensation for Firefighters with Cancer; Eligibility*, Vermont Dept. of Labor and Vermont Dept. of Financial Regulation, January 15, 2024, accessed January 27, 2026, <https://legislature.vermont.gov/assets/Legislative-Reports/Act-26-of-2023-Workers-Compensation-for-Firefighters-with-Cancer.pdf>.

(2) the number and percentage of those claims that were approved:

Six of the nine claims identified above (67%) are currently pending with incurred losses, paid losses, or both.² Three of the nine claims (33%) were closed without payment (denied).

(3) the types of cancer for which the claims were submitted:

2 claims for colon cancer

2 claims for prostate cancer (one has no diagnosis)

1 claim for pancreatic cancer (stage 4)

2 claims for glioblastoma (brain tumor)

1 claim for Merkel cell carcinoma

1 claim for lung cancer (metastasized)

(4) national trends with respect to workers' compensation claims for cancer submitted by firefighters during the previous 24 months, including, to the extent that information is available, the number of claims filed, the rate of claim approval, and, to the extent information is available, the types of cancer for which claims were submitted.

Data responsive to this request continues to be unavailable. DFR includes related available information below.

Data Collection Method

Section 13(b) of Act 184 directed all workers' compensation insurers doing business in Vermont to report to DFR data regarding cancer claims received by the insurer from Vermont firefighters in a time and manner specified by the Commissioner of Financial Regulation.

To facilitate the collection of this information, DFR issued a data call to all workers' compensation insurers doing business in Vermont in Insurance Bulletin 239.³ In response, insurers reported the following:

² "Incurred losses" are the sum of paid losses and allocated reserves for expected future payments for a claim. For present reporting purposes, DFR considers it appropriate to provisionally categorize pending claims with incurred losses as "approved."

³ Vermont, Dept. of Financial Regulation, *Insurance Bulletin #239: Firefighters' Workers' Compensation Data Call*, (Montpelier: Dept. of Financial Regulation, 2025), <https://dfr.vermont.gov/content/firefighters-workers-compensation-data-call>.

- (1) The number of policies in force and number of firefighters in Class Codes 7710 (non-volunteer) and 7711 (volunteer);
- (2) The number of workers' compensation claims for cancer received by each insurer from Vermont firefighters between October 1, 2023 and October 1, 2025;
- (3) For each claim:
 - (a) the report and accident dates for each cancer claim
 - (b) incurred death and widow indemnity benefits and all other indemnity amounts
 - (c) incurred all other indemnity amounts
 - (d) incurred medical amount
 - (e) paid indemnity amount
 - (f) paid medical amount
 - (g) nature, cause, and type of injury
 - (h) type of cancer
 - (i) status of the claim: open, closed with payment, or closed without payment (denied)

Additional Relevant Information

DFR received 238 insurer responses to the data call. Of these 238 insurers, only 11 reported that they provided workers' compensation coverage to firefighters in Vermont. The 11 insurers reporting Vermont coverage covered 1,082 non-volunteer firefighters and 1,656 volunteer firefighters in our state. The insurer covering the largest share of Vermont firefighters (approximately 40%) is the Property and Casualty Intermunicipal Fund, whose coverage is available to Vermont municipalities through the Vermont League of Cities and Towns.

As discussed previously in the 2024 report, a national database of firefighter workers' compensation claim data does not exist. DFR contacted the actuarial consultants that contributed to the 2024 report and confirmed that national claims data on firefighters continues to be unavailable. DFR also contacted the National Council on Compensation Insurance (NCCI), which provided a copy of their most current research brief, "Firefighters and First Responders: 2023 Update on Presumptive Workers Comp Benefits," outlining considerations for the analysis of the effect of presumptions on the insurance market.⁴

⁴ Kim Neugent and Bruce Spidell, *Firefighters and First Responders: 2023 Update on Presumptive Workers Comp Benefits*, National Council on Compensation Insurance, February 2023, accessed

Conclusion

As indicated above, this is the first of three reports DFR is required to submit by Act 184 (2024). To facilitate the remaining reporting required by Section 13(b), DFR will issue similar data calls in 2027 and 2029 to collect firefighters' workers' compensation policy and claim data for the successive two-year periods October 1, 2025 through October 1, 2027 and October 1, 2027 through October 1, 2029. DFR will also continue to work to identify any available sources for national data on firefighter cancer claims.