



MCMINNVILLE FIRE DISTRICT

3850 SE Three Mile Ln McMinnville, Oregon 97128 Phone 503.435.5800

10/03/2025

To: Lisa Emerson, Department of Consumer and Business Services
lisa.emerson@dcbs.oregon.gov

Karen Winkel, Department of Consumer and Business Services
Karen.J.Winkel@dcbs.oregon.gov

From: Amy Hanifan, Division Chief of Operations, McMinnville Fire District
amy.hanifan@mcminnvillefiredistrict.gov

RE: HB 3243 Rules Advisory Committee

McMinnville Fire District is a fire-based emergency medical services provider, including ambulance transport, in Yamhill County ASA #2. Thank you for taking time to consider these comments regarding the rule making for HB 3243. This legislation is well needed and provides an important framework towards ambulance billing.

OAR 836-053-XXXX, Balance billing prohibition and consumer cost-sharing for ground ambulance services. We question this proposed rule for the following reasons:

Proposed section (2) states that “a ground ambulance services organization shall refund any amount in excess of the in-network cost-sharing amount to an enrollee within 30 business days of receipt if the enrollee has paid the ground ambulance services organization an amount that exceeds the in-network cost-sharing amount determined under subsection (1)(a).” A timeline certainly makes sense with this process. We question the ability of ambulance providers to be able to return these funds within 30 days.

Our organization utilizes a third-party billing company. It is not uncommon for the process of returning a refund to take longer than 30 days, purely due to all the steps taken to notify and process. The billing company we contract with has shared that their Washington clients have struggled with a 30-day timeline and are being held accountable for not meeting the expected timeline.

We believe a 60–90-day timeline would be more reasonable and would allow for all the proper steps to be followed. It is reasonable to assume that providers of smaller sizes would have greater challenges in the short timeline which is currently proposed. While our organization is fortunate to have staff dedicated to this effort, there are still limitations which would cause concern in the ability to accomplish the proposed timeline of 30 days.

McMinnville Fire would like to express gratitude to DCBS and those working toward the effort of implementing HB 3243. Thank you for your consideration of the included comments.

Amy Hanifan, McMinnville Fire District