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**FR:** Sabrina Riggs, Oregon State Ambulance Association  
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**RE:** HB 3243 (2025) Rules Advisory Committee

***Submitted electronically on February 17, 2026***

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The Oregon State Ambulance Association (OSAA) is a statewide association of EMS providers that includes public, private, non-profit, ground and air membership. On behalf of our membership, we offer the below comments on the rulemaking efforts related to HB 3243 (2025 Session).

OSAA appreciates that DCBS filed temporary rules to ensure that the bill could be implemented by the effective date of January 1, 2026. These temporary rules ensured that the robust Rules Advisory Committee discussion could be reflected in the rules and that patients and providers alike were protected under the new law on January 1, rather than having to wait for the permanent rules process.

OSAA also appreciates the materials, including the forthcoming database of plans and those that have opted in to the protections created in HB 3243 (2025). This resource will help ensure that patients understand what their individual plan offers, that patients whose plans are participating are not inappropriately billed, and provides a critical resource to EMS providers.

OSAA also greatly appreciates the webinars and other support services that DCBS has offered to Ground Ambulance Services Organizations related to the new law and reporting requirements.

As mentioned at previous RAC meetings and in previous comments, our members that serve both Oregon and Washington continue to share that they are experiencing that some insurers are only paying out the backup Medicare rate, and not the locally established rate even when it is included in the database. While OSAA suggests adding strong enforcement language to the final rules, we do appreciate that the website already includes information for EMS agencies about the available resources in the event that an insurer is not reimbursing appropriately.

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