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April 2, 2026

**TO:**

Ms. Lisa Emerson, Department of Consumer and Business Services  
Ms. Karen Winkel, Department of Consumer and Business Services

**RE:** HB 3243 (ORS 743B.292) – Public Comment on Proposed Rules

Dear Ms. Emerson and Ms. Winkel,

Bend Fire & Rescue appreciates the opportunity to provide public comment on the proposed rules implementing HB 3243. We oversee ambulance billing and revenue cycle operations and recognize the Department's work on this important consumer protection effort.

We support the intent of HB 3243 and the proposed rules. Our remaining primary concerns center around the following implementation and accountability issues:

1. Insurer claim reprocessing timelines and accountability
2. Identification of participating self-funded plans

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**1. Insurer Reprocessing Timelines and Accountability**

While the statute establishes consumer cost-sharing protections, it does not specify timelines for insurers to reprocess and correct non-compliant claims. The proposed rules include deadlines for reimbursing consumers for erroneous overpayments, but they do not establish parallel expectations for insurers to correct the underlying claim adjudication.

In practice, this has resulted in repeated back-and-forth with certain carriers on the same claims, prolonged resolution timelines, and ongoing noncompliance with HB 3243 requirements. These repeated reprocessing efforts have created a significant added burden and time commitment for our billing staff, who must continually follow up on claims they do not control.



Clear insurer reprocessing standards would promote consistent compliance and ensure accountability is shared across all parties involved in implementing the law.

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## 2. Identification of Participating Self-Funded Plans

Ambulance providers need a reliable method of identifying which self-funded employer plans have opted into Oregon’s ground ambulance balance billing protections. Without access to an opt-in database, billing teams risk inadvertent balance billing of patients and increased administrative work despite good-faith compliance efforts.

Providing providers with access to a current opt-in list would improve claims accuracy, reduce rework, and further protect consumers.

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Bend Fire & Rescue appreciates the Department’s continued work to implement HB 3243 in a practical and equitable manner. Thank you for your consideration of these comments.

Sincerely,

Kindra Harms  
Ambulance Billing Supervisor  
Bend Fire & Rescue

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