

April 14, 2026

Oregon Division of Financial Regulation
350 Winter Street NE
Salem, OR 97301
Submitted via email

Re: Comments on ground ambulance proposed rule

Dear Ms. Emerson,

Kaiser Foundation Health Plan of the Northwest appreciates the opportunity to provide feedback to the Oregon Division of Financial Regulation (DFR) on the proposed regulation for ground ambulance reimbursement. Kaiser Permanente Northwest is an integrated health care system that covers and cares for Oregonians. We are committed to delivering affordable, coordinated, and high-quality care and coverage that supports not only our members but also the communities we serve.

Support the clarification that health insurers may pay the in-network contracted rate to ground ambulance services organizations

The purpose of HB 3243 and the accompanying regulation is to protect consumers from balance billing for ground ambulance services. When a contractual relationship exists between a health carrier and ground ambulance services organization (GASO), balance billing does not occur because the parties have agreed to both (i) a specific reimbursement rate for covered services, and (ii) an express contractual prohibition against balance billing. We support the inclusion of the language in OAR 836-053-0454 that addresses health carriers paying the rate pursuant to a written contract between the GASO and the health carrier.

Use of publicly available dataset for determining locally established rates

The DFR has provided an interpretation that the dataset of locally established rates on the DFR's website is a transparency resource and should not be relied on by health carriers to determine the allowable amount for ground ambulance claims. We believe the legislative intent of publicly posting the dataset was for the dataset to be a resource that health carriers could rely on to find the GASO's established local rate. The DFR's interpretation is that the claims adjudication process should include the health carrier contacting the GASO by phone or email to confirm the rate before paying the claim. This introduces a health carrier work process that was not contemplated by the legislature. We urge the DFR to reconsider this position and

clarify in the permanent regulation that a health carrier may rely on the published dataset to determine the appropriate allowable amount for GASO claims.

Thank you for considering our comments on the proposed regulation.

Sincerely,

A handwritten signature in black ink that reads "Merlene Converse". The signature is written in a cursive, flowing style.

Merlene Converse

Government Relations Consultant IV

Kaiser Foundation Health Plan of the Northwest

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