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RE: HB 3243 (2025) Proposed Permanent Rules

Submitted electronically on April 27, 2026

The Oregon State Ambulance Association (OSAA) is a statewide association of EMS providers that includes public, private, non-profit, ground and air members. 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 HB 3243 (2025) could be implemented by the effective date of January 1, 2026, and we appreciate that the proposed permanent rules look substantially similar to the regulatory framework that EMS providers and insurers have been operating under since January 1, 2026.

OSAA supports the additional clarification in the proposed permanent rules that the rule and law applies to out of network situations, where there is not an existing contract between the insurer and the EMS provider. This is consistent with OSAA's understanding of HB 3243 (2025 Session) and of the current temporary rule.

Additionally, OSAA wishes to remind DCBS and insurers that EMS providers cannot bill above the locally established rates set by their local governments. These locally established rates apply to all people within the designated area, regardless of their insurance status. As such, EMS providers may not bill above the approved rates—meaning, the bill received by insurers is accurate to the current approved reimbursement rate. As an additional layer of transparency, the locally established rates are provided to DCBS by the EMS providers annually and within 5 days upon any changes. Finally, since it is a requirement for these rates to be set through a public process, they are also available in the meeting materials of the local governments who have approved them.

2026-2027 Officers:

President Mike Lepin Jefferson County Fire & EMS	Vice President Sheila Clough Mercy Flights	Treasurer Rob McDonald AMR	Secretary Jenn Ford Mid-Valley Ambulance	Past President Tim Novotny Bay Cities Ambulance	Legislative Co-Chair John Tacy, Lebanon Fire Dan Brattain, REACH Air
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OSAA also appreciates the materials created by DCBS, including the database of plans and those that have opted in to the protections created in HB 3243 (2025). This resource helps ensure that patients understand what their individual plan offers, that patients whose plans are participating are not inappropriately billed, and it 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 would support 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.

In close, the Oregon State Ambulance Association is appreciative of DCBS work to implement HB 3243 (2025), and support the proposed final rules. Thank you for your consideration of the above comments.

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