



Oregon Division of Financial Regulation
Department of Consumer and Business Services
350 Winter St. NE
Salem, OR 97301

Attn: Lisa Emerson, Senior Policy Advisor, and Karen Winkel, Rules Coordinator

Subject: Comments on [Proposed Rules](#) to Implement HB 3243, Ground Ambulance Balance Billing

Dear Ms. Emerson and Ms. Winkel,

Thank you for the opportunity to provide comments on the Department's proposed rules to [implement HB 3243](#), which protects Oregonians from surprise billing for ground ambulance services.

[United States of Care](#) (USofCare) is a non-partisan, non-profit organization working to ensure everyone has access to quality, affordable health care, regardless of who they are, where they live, or how much money they make. We work in states across the country, including Oregon, to develop pragmatic policy solutions that are designed to respond to the needs of people. To that end, we have been supportive of [states' efforts](#) nationwide to protect people from ground ambulance surprise bills. In Oregon, we submitted [comments](#) to the House Committee on Behavioral Health and Health Care last year during consideration of HB 3243.

The proposed rules will help ensure Oregonians aren't stuck with a more expensive bill just because the emergency ambulance they took to the hospital was out-of-network. Unfortunately, there may be times when a patient is mistakenly sent and pays a now-prohibited surprise bill. **Should this happen, we believe a ground ambulance provider should refund any "erroneous overpayments" back to the patient no later than 30 business days after receipt and, ideally, no later than 30 calendar days. We strongly encourage the agency to update the proposed rules to reflect this.** We believe the 45 business day reimbursement turnaround in the proposed rule is too long, especially for people with low incomes who may be forced to delay necessary expenses, like rent or medicines, while waiting to be reimbursed. Many people just don't have the means to wait more than two months to have, on average, [more than a thousand dollars](#) returned without significant impacts to their family budgets.

HB 3243 also requires ground ambulance providers to share their local payment rates, where applicable, with the Department of Consumer and Business Services (DCBS) to include in a publicly accessible database. **We support the robust enforcement of these requirements included in the proposed rules to avoid any incomplete or inconsistent reporting and allow DCBS and others to compare rates across providers.** Doing so will provide a more complete picture of ground ambulance billing rates,

help identify any billing outliers or sudden changes in rates, and inform future legislative or regulatory efforts to protect people and lower costs.

We strongly support Oregon's efforts to protect people from ground ambulance surprise billing as one element of a larger effort to lower costs for Oregonians generally. Thank you for the opportunity to comment on the proposed rule. We sincerely appreciate DCBS's work to implement HB 3243. Please do not hesitate to reach out with any questions.

Sincerely,

Kelsey Wulfkuhle
Senior Advocacy Manager
United States of Care

Eric Waskowicz
Senior Policy Manager
United States of Care