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*Sent via email December 1, 2025*

Re: HB 3243 (2025) Rules Advisory Committee Comments

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The Association of Oregon Counties (AOC) offers the following feedback on the most recent draft rule to implement HB 3243 (2025).

### ***Reimbursement Rates***

AOC is supportive of the draft language DCBS presented at the November RAC meeting in draft OAR 836-053-0454(1)(b) and (2)(b), to ensure that this backup rate is not eroded by a peg to a single point in time. We believe that this meets with the legislative intent of the bill and is a reasonable backstop for ground ambulance service organizations (GASO) and a known number that the insurers may input into their payment systems.

### ***Locally Established Rates***

At the November RAC meeting there was some discussion about the ability of DCBS to set up the rate database by the January 1 implementation date in statute and what rates insurers would pay should the database not be available. While AOC sympathizes with the difficulty the insurer would have in determining the locally established rate absent a centralized database, our position is that the statutory language requires payment of that local rate, rather than the 325% of Medicare or the insurer's preferred allowed amount for services rendered and billed by the GASOs.<sup>1</sup> While we hope that DCBS is able to establish

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<sup>1</sup> HB 3243 (2025) Section 2(2) - A health benefit plan must reimburse the ground ambulance services organization at the established local rate or if an established local rate does not exist, in an amount no less than 325 percent of the Medicare rate.

the database by January 1, we would request the department include information to insurers about this in an FAQ document to accompany the temporary rule should the database not be available when the statute becomes effective.

AOC appreciates the work of DCBS in this rulemaking on a very tight timeline, and thanks you for taking these comments into consideration for the rulemaking process.