

Lebanon Fire District

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December 1, 2025

TO:

Lisa Emerson
Department of Consumer and Business Services
lisa.emerson@dcbs.oregon.gov

Karen Winkel
Department of Consumer and Business Services
Karen.J.Winkel@dcbs.oregon.gov

FROM:

John Tacy
Lebanon Fire District

RE: HB 3243 (2025) Rules Advisory Committee – Public Comment

Dear Ms. Emerson and Ms. Winkel,

On behalf of the Lebanon Fire District, thank you for the opportunity to provide comments on the rulemaking efforts related to HB 3243 (2025 Session). As a public EMS provider serving our local community, we respectfully submit the following feedback:

Time-Specific Medicare Rates

Lebanon Fire District supports the proposed language presented at the most recent RAC meeting. We believe this approach maintains the legislative intent of HB 3243 while avoiding unnecessary rulemakings and preserving state resources.

During the meeting, there was discussion regarding the timing of annual adjustments. CMS typically publishes the ambulance inflation factor in late October or early November. These updates are annual, not quarterly, and the public use files include actual payment amounts by ZIP code. We've attached an example transmittal from last year to illustrate this.

Resident/Non-Resident Rates

There was also discussion about resident and non-resident rates. Where such rates exist, they are typically regulated at the local level. Therefore, we support including these rates in the database that DCBS is developing to ensure transparency and consistency.

Enforcement of Locally Established Rates

As a provider that operates near the Oregon-Washington border, we continue to experience challenges with insurers reimbursing only at the Medicare backup rate, even when a locally established rate is listed in the database. We recommend that DCBS include strong enforcement language in the rules and provide guidance—either in the rule itself or in an FAQ—on what EMS agencies can do if insurers fail to reimburse appropriately.

Additional Considerations

- **Clarification on Contracts:**

We request a clear statement that HB 3243 does not eliminate the ability for EMS agencies to enter into contracts with insurers. The protections in the bill and rules should apply when no contract exists, but the option to contract should remain. This aligns with the legislative intent, as reflected in the reporting requirement in Section 3 of HB 3243, which asks for data on contracts entered into after January 2026.

Thank you for your continued work on this important issue. Lebanon Fire District looks forward to supporting the implementation of HB 3243 in a way that ensures fair reimbursement and supports the sustainability of EMS services across Oregon.

Sincerely,

John Tacy

Lebanon Fire District

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 **LEBANON**
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FIRE DISTRICT John Tacy, Fire Chief

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