

April 6, 2021

Oregon State Legislature
House Committee on Health Care
900 Court Street NE
Salem, OR 97301

RE: HB 3159 Hospitals Support Data Justice Act: Support with Amendments

Chair Prusak and members of the House Committee on Health Care:

Thank you for hearing House Bill 3159 and your efforts ensure meaningful data regarding race, ethnicity, language, disability (REALD), sexual orientation, and gender identity (SOGI) is collected to improve health outcomes for individuals and communities. Oregon hospitals are committed and collaborative partners in the collection and reporting of this foundational information to support efforts to address racism and other forms of bias.

Since REALD collection requirements were established for all COVID-19 encounters, hospitals continue to find and adapt to best practices that enhance the patient and provider experience. Additionally, hospitals continue our efforts to refine workflows and address the administrative complexity of data collection and reporting requirements to the Oregon Health Authority.

OAHS appreciates the work that has gone into this bill and look forward to seeing a final amendment. To maximize meaningful use and limit complexity for patients and providers, we will look to ensure the following are considered in implementation:

- **Ensure that OHA infrastructure is established before data collection and reporting mandate.** Hospitals need to fully understand the mechanics of the reporting infrastructure before building systems to collect data. Before requiring compliance, OHA needs resources to establish a streamlined process for reporting. Providers must have input as to whether the infrastructure is functional before requiring providers to collect this data.
- **Allow for flexibility in the manner in which data is collected.** One lesson learned from collecting REALD data for COVID-19 encounters is that some data fields are best completed at intake and others are more appropriate to be answered with support of a medical assistant. Additionally, some systems already gather this data and would need flexibility to report existing data to avoid duplication for the patient. Hospitals look forward to discussing this during the rulemaking and workgroup process.
- **Align REALD and SOGI data requirements with national standards and enable data flow over CIEs and HIEs.** Hospitals will look to align REALD/SOGI questions and

responses with existing state and federal requirements and national best-practices to avoid duplication for patients and make data actionable

- **Ensure that implementation is collaborative.** The forthcoming amendment reflects that penalties will not be imposed until OHA has its process in place. Hospitals look forward to collaboration this collaborative approach in both data collection and reporting.

Collectively we can learn from operational experiences with the collection of REALD information from COVID-19 encounters. Hospitals can inform a meaningful data collection and reporting system that will help Oregon address the health issues disproportionately impacting BIPOC, LGBTQ+ people, people with disabilities and other underserved populations.

Thank you,

