



January 28, 2025

The Honorable Rob Nosse
Chair, House Committee on Health Care
State Capitol
Salem, Oregon 97301

RE: House Bill 3221– Urgent Care Centers

Dear Chair Nosse and members of the committee:

Providence is committed to ensuring that Oregonians have access to high-quality, comprehensive, affordable health care. To achieve this goal, Providence believes patients must have clear and consistent information to empower their health care decision making – including where to receive care. Providence supports efforts to ensure patients know where to access care, but we are concerned HB 3221 as drafted will unintentionally increase costs and/or limit access to care.

While we understand and support the intent of the legislation to help patients understand where to go for care and what services will be available to them, we recommend a simplified approach.

Many urgent care centers, as well as immediate care or express care, are registered with the Oregon Health Authority (OHA) under a hospital or health care facility license. Rather than create an additional registration for facilities that are already registered with the OHA, we recommend requiring only urgent care centers not operating under an existing license to register.

One other area of concern, HB 3221 would define the services provided by an urgent care center to include entities that currently operate as an express care clinic or immediate care center. These facilities, by operating as an extension of primary care, provide flexible care options for services like diagnosing strep throat, evaluating common childhood conditions like pinkeye, flu-testing, easy stitches for scrapes, and important access on the weekend for UTI's or other services – all at the same co-pay structure as a primary care visit. Urgent care centers often have different cost-sharing obligations than these other modalities. By defining types of walk-in care as urgent care we are creating two potential problems:

1. Increased cost to access care as everything will be at urgent care cost sharing; and
2. Decreased access to care as many facilities will be unable to upgrade to include always having x-ray available. The cost structure of the new requirements would likely reduce the number of facilities capable of providing access to care for low-level, but immediate, care needs.

To ensure patients understand what services are available at an urgent care, immediate care, or express care (among other names for these services) we would urge that each facility provide a clear description of services available at that site on their website. This would enable consumers to be able to make decisions about where to seek care services while avoiding the unintended consequence of asking every facility to meet a costly universal standard that may limit access and increase cost of care.

Thank you for the opportunity to provide comment. We look forward to working with the bill sponsor to improve consumer information on this topic.

Sincerely,

A handwritten signature in black ink, appearing to read "B. LeBlanc".

Benjamin LeBlanc, MD
Chief Executive
Providence Medical Group – Oregon
Providence Health & Services