



February 27, 2025

RE: House Committee on Behavioral Health and Health Care Hearing on HB 3243

Dear Chair Nosse and Members of the Committee,

Thank you for the opportunity to provide testimony **in support of the concept of the amendment posted for [HB 3243](#)**, which seeks to protect Oregonians from balance billing and establish payment rates 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 health status, social need, or income.

Despite Congress taking action to protect people from surprise medical bills through the [No Surprises Act \(NSA\)](#) to try and protect people from surprise bills, Oregonians still face surprise bills from ground ambulance services. This is consistent with what we hear across the country, as most state laws and the NSA do not comprehensively address ground ambulance service rates and billing practices. When experiencing an emergency that requires immediate medical attention, people don't have the option or time to make sure the responding ambulance is in-network with their health insurance company. For many, this means using an ambulance that is out-of-network, often without even knowing. Approximately [half](#) of emergency ambulance rides result in a surprise medical bill, the [highest](#) out-of-network billing rate of any specialty. Concerns over the cost of these services threaten to exacerbate existing health disparities as surprise bills often add to the [disproportionately high](#) levels of medical debt held by people of color compared to their white counterparts.

In the absence of federal action, [18 states](#) have passed ground ambulance billing reforms to protect people from these surprise charges. HB 3243, in line with other state's efforts, represents a meaningful change in policy to address the very real challenges consumers face in accessing and affording ground ambulance services by standardizing the payment rates, making them transparent, and ensuring consumers aren't stuck in the middle of billing disputes between providers and carriers. **We support the posted amendment concept's lowering of the out-of-network rate to 325% of what Medicare pays, mirroring the rate set by nearly every other state that has adopted these protections.** This is a necessary improvement from the originally proposed rate of 400%, significantly higher than the current average rate. Higher reimbursement rates paid by insurance companies for ground ambulance services are then passed on to consumers as insurers increase premiums and out-of-pocket costs as they attempt to recoup these higher ambulance payments, exacerbating the [affordability crisis](#) Oregonians already face.

While we believe the concept of the amendment put forward is a good starting place to bring Oregon's surprising billing protections in line with other states, we would encourage the

committee to consider the inclusion of out-of-pocket price caps and setting guardrails on using locally set ambulance rates in order to keep care affordable.

Using Locally Set Ambulance Rates

HB 3243 requires health insurers to reimburse ground ambulance services at the rate established by local municipalities, placing no guardrails on these rates to ensure they do not drive up costs, contrary to the [recommendations](#) made by the federal Ground Ambulance and Patient Billing (GAPB) Advisory Committee. [Experts agree](#) that local governments may set overly generous ambulance reimbursement rates to help fill gaps in their budgets, allowing ambulance providers to charge insurance companies higher rates. Additionally, the bill lacks language to disincentivize these local rates from creeping even higher. **To address this, the committee should add language to ensure reimbursement is the lesser of the locally established rate or the rate set in statute.**

Capping Consumer Out-of-Pocket Costs

As introduced, HB 3243 would have capped the out-of-pocket costs consumers are required to pay for ground ambulance services at \$100. This innovative idea, in line with the GAPB Advisory Committee [recommendations](#), would help Oregonians better plan for their health care costs. Given that [10%](#) of working-age people hold medical debt from ground-ambulance related charges, it's clear that action is needed to protect people—including Oregonians.

We thank the committee for your commitment to ensuring Oregon residents are protected from expensive, unexpected health care costs. **United States of Care is supportive of the concept of the proposed amendment to HB 3243, a necessary change to slow rising health care costs.** We thank the committee for its work on this issue and urge the committee to consider United States of Care a resource moving forward. Please do not hesitate to reach out if you have any questions.

Sincerely,

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