



May 28, 2025

Oregon State Legislature
Senate Committee on Rules
900 Court Street NE
Salem, OR 97301
Submitted electronically via OLIS

RE: SB 1060A, relating to standard charges established by a hospital

Chair Jama, Vice-Chair Bonham and Members of the Committee:

The Hospital Association of Oregon is a mission-driven nonprofit association representing Oregon's 61 community hospitals.

The Hospital Association of Oregon opposes SB 1060A, which would create hospital price transparency requirements that are different than the federal standards, adding low-value provisions with high administrative costs to hospitals at a time when they are facing potential reductions in Medicaid. Moreover, the federal requirements are not stable. On May 22, the Centers for Medicare and Medicaid Services (CMS) issued guidance that changes how hospitals must implement the federal price transparency rules, creating new requirements for hospitals. This is not the right time for this bill.

The cost for a patient to receive services at a hospital in Oregon—or any other state in the United States—depends on their insurer, their out-of-pocket cost obligations under their insurance plan, how much they have already paid towards those costs, whether they are eligible for financial assistance, and a variety of other factors. This is a confusing and costly system for patients, which SB 1060A does nothing to address. Instead, SB 1060A would create costly, ambiguous, and unnecessary requirements for Oregon's resource-constrained hospitals.

When this bill was introduced, the advocates were seeking new enforcement mechanisms, explaining that federal enforcement had not been sufficient. This is no longer the case. President Trump issued an executive order with plans to accelerate enforcement. We opposed adding new state enforcement



during a time when federal enforcement is also ramping up. Although SB 1060A has removed the enforcement provisions, the provisions that remain are still costly and inappropriate.

SB 1060A does not align with federal standards, and in any event, the federal standards are not stable. SB 1060A creates its own definitions rather than referencing federal definitions, and it does not directly reference or track the federal rules. As a result, there are differences between the federal standards and the proposed state standards, and those differences are expected to grow as the federal requirements evolve.

Just last week, CMS changed how hospitals must implement the price transparency requirement through CMS recent guidance.¹ We expect the requirements will continue to change, as President Trump has shared that enforcement of the price transparency standards is a priority for the administration. SB 1060A does not account for such changes.

One notable difference between federal standards and SB 1060A is that SB 1060A fails to preserve the option for hospitals to use a price estimator tool to satisfy the federal requirement to publish standard charges for shoppable services. Under the federal price transparency rules, hospitals can satisfy this requirement by maintaining an internet-based price estimator tool that meets the specifications outlined in 45 CFR 180.60. Some hospitals in Oregon have already established online price estimator tools to meet the federal requirements. SB 1060A does not allow that option, presenting a significant administrative burden for hospitals.

Because of its onerous requirements, SB 1060A will divert scarce health care dollars from patient care to administrative bureaucracy. Around half of Oregon's hospitals are operating at a loss and struggling to maintain services. This bill forces hospitals to spend more on administration, making fewer resources available for frontline workers and patients.

We appreciate that the sponsors of this bill are concerned with the cost of health care. Insurers, not hospitals, are best equipped to help patients understand their financial obligations, if they have them. Insurers have access to the information patients need, such as their deductible and co-pay and information about the insurer's network, to understand their out-of-pocket costs. A patient-centered solution to the concern about out-of-pocket costs would be to require insurers to fulfill their responsibilities to their health plan members.

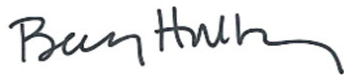
¹ CMS, Updated Hospital Price Transparency Guidance Implementing the President's Executive Order "Making America Healthy Again by Empowering Patients with Clear, Accurate, and Actionable Healthcare Pricing Information", May 22, 2025, available at: <https://www.cms.gov/files/document/updated-hpt-guidance-encoding-allowed-amounts.pdf>



The out-of-state special interests promoting this bill do not understand the Oregon health care system and its fragility compared to other states. More information on the fragility of Oregon hospitals is available in our report, [Oregon hospitals on the brink](#).²

This is the wrong time for this bill. This bill will divert resources from patient care, while failing to help Oregonians. We strongly urge you to reject this legislation.

Sincerely,



Becky Hultberg
President and CEO
Hospital Association of Oregon

About the Hospital Association of Oregon

Founded in 1934, the Hospital Association of Oregon (HAO) is a mission-driven, nonprofit trade association representing Oregon's 61 hospitals. Together, hospitals are the sixth largest private employer statewide, employing more than 70,000 employees. Committed to fostering a stronger, safer, more equitable Oregon where all people have access to the high-quality care they need, the hospital association supports Oregon's hospitals so they can support their communities; educates government officials and the public on the state's health landscape, and works collaboratively with policymakers, community based organizations and the health care community to build consensus on and advance health care policy benefiting the state's four million residents.

² Oregon hospitals on the brink, available at: https://oregonhospitals.org/wp-content/uploads/2025/04/2025.04.25_Report_Oregon-Hospitals-on-the-Brink_FINAL.pdf

