

Submitter: Patricia Piazza  
On Behalf Of:  
Committee: Senate Committee On Health Care  
Measure, Appointment or Topic: SB1598

## TESTIMONY IN OPPOSITION TO SB 1598

To: Members of the Oregon Senate [Committee Name]

From: Patricia Piazza

Date: 02/11/26

Re: Opposition to SB 1598

Dear Chair and Members of the Committee:

I write to express my strong opposition to SB 1598, which would grant unprecedented authority to Oregon's Public Health Officer to mandate insurance coverage for vaccines and issue statewide standing orders for prescription drugs and medical devices.

My primary concerns with this legislation are:

### 1. EXCESSIVE CONCENTRATION OF POWER IN A SINGLE UNELECTED OFFICIAL

SB 1598 grants the Public Health Officer — a single appointed, un-elected official—the authority to effectively mandate medical interventions by requiring insurance coverage within 15 business days of a recommendation. This bypasses the normal legislative process, removes checks and balances, and eliminates meaningful public input on decisions that affect every Oregonian's healthcare.

### 2. UNDERMINES THE PATIENT-PHYSICIAN RELATIONSHIP

The standing order provisions in Section 2 allow the Public Health Officer to prescribe drugs and devices for entire classes of people without individual medical evaluation. This fundamentally undermines the patient-physician relationship and the principle that medical care should be individualized based on each person's unique health circumstances, medical history, and risk factors.

### 3. INADEQUATE TRANSPARENCY AND ACCOUNTABILITY

While the bill requires publishing recommendations on a website, it provides no meaningful opportunity for public comment, legislative review, or appeal. The 15-business-day implementation timeline is far too short for proper evaluation of safety,

efficacy, cost implications, or unintended consequences.

#### 4. FINANCIAL IMPLICATIONS NOT ADDRESSED

Mandating insurance coverage for any immunization recommended by the Public Health Officer will inevitably increase insurance premiums for all Oregonians. The bill contains no fiscal analysis, cost controls, or consideration of the financial burden on families and small businesses already struggling with healthcare costs.

#### 5. OVERLY BROAD AUTHORITY FOR STANDING ORDERS

Section 2 grants authority to issue standing orders for "any infectious or noninfectious disease or other significant public health concern"—language so broad it could encompass virtually any medical condition. This could include controversial treatments, off-label uses, or interventions lacking long-term safety data.

#### 6. EMERGENCY CLAUSE CIRCUMVENTS REFERENDUM PROCESS

The emergency clause means this bill would take effect immediately upon the Governor's signature, preventing Oregonians from exercising their constitutional right to referendum. There is no genuine emergency justifying this circumvention of democratic processes.

#### 7. FREEZES FEDERAL STANDARDS AT AN ARBITRARY DATE

Section 1 locks in federal preventive health service rules as of June 30, 2025, then adds an open-ended mandate for any future immunizations recommended by the Public Health Officer. This creates a confusing dual standard and removes Oregon's ability to respond to changes in federal policy or emerging evidence.

#### 8. INSUFFICIENT SAFEGUARDS

While the bill mentions "evidence-based" recommendations and consideration of guidance from medical organizations, these are merely suggestions, not requirements. There are no specific standards, no requirement for peer review, and no mechanism for challenging recommendations that may be premature or inappropriate.

### CONCLUSION

Healthcare decisions should be made by patients in consultation with their physicians, not mandated by government officials. Insurance coverage decisions should be made through transparent processes with legislative oversight and public input. SB 1598 concentrates too much power in too few hands with too little

accountability.

I urge you to oppose SB 1598 and instead pursue healthcare policies that respect individual medical decision-making, maintain appropriate checks and balances