



March 23, 2021

The Honorable Rachel Prusak
Chair, House Health Care Committee
900 Court St. NE
Salem, OR 97301

RE: House Bill 2076 – Emergency Medical Services modernization

Dear Chair Prusak and members of the committee:

As the largest health care provider in Oregon, with eight hospitals and emergency departments across the state, Providence Health & Services understands the importance of developing systems of care conducive to serving each community's individual needs. House Bill 2076 would have a significant impact on Emergency Management Services statewide, and we respectfully request the necessary flexibility to ensure the process and system works for everyone.

Through initial conversations with the Oregon Health Authority regarding House Bill 2076, we understand there will be opportunities for additional discussions this session and appreciate their continued partnership. Providence's focus for these discussions will be in three primary areas:

Maximize existing systems and structures

House Bill 2076 gives OHA broad authority to establish a comprehensive Emergency Health Care System. It is Providence's preference to keep the best of our current system and simply augment or revise aspects as necessary, rather than overhauling the entire local and statewide structure. This includes alignment with established CMS guidelines, nationally recognized best practices and existing regulations – to avoid creating unnecessary complexity and duplication.

Opportunities for collaboration and engagement

This bill has significant implications on providers, facilities, patient outcomes and the total cost of care but there has been limited opportunity to provide input. Including primarily clinical and EMS specialists and not more diverse statewide perspectives on the established Emergency Health Care Systems Advisory Board means that the state will not fully understand the potential implications of these changes, especially on small and rural communities. Providence would request that language is added to encourage broader engagement in discussions that will have implications on the broader health system.

Practical implications of these changes deserve more attention

Understanding the down-stream impact House Bill 2076 will have on hospitals and access to care is critical. This bill has the potential to direct ambulance traffic towards/away from one hospital to another. These hospitals need to be involved when these very granular decisions are being made.

Considerations for mental and behavioral health are not explicitly called out in this plan, when it represents a significant volume for EMS and for the EDs. These patients are more complex, have longer length of stay and reimburse at a lower rate. Any EMS system of care should explicitly incorporate strategies for serving these patients.

We appreciate the ability to express our concerns with House Bill 2076 as drafted and look forward to continued conversations with the Oregon Health Authority.

Sincerely,

A handwritten signature in black ink, appearing to read "William Olson". The signature is fluid and cursive, with the first name "William" being more prominent than the last name "Olson".

William Olson
Chief Operating Officer
Providence Health & Services - Oregon