

SEIU 49 Testimony - Sept 30, 2024

SEIU Local 49 was a key advocate for the passage of HCMO's establishing legislation in 2022. We firmly believe that the program is critical to ensuring that any healthcare deals made in this state actually benefit consumers by reducing costs and expanding access to care. We believe the agency's updates to these rules maintain the intent of the original draft, with some important clarifications that strengthen the program further.

As such, we are generally in favor of the rules as drafted, though we do urge the agency to consider the extensive comments submitted by advocates. In particular, we agree that OHA should aim to resolve the ambiguity between the proposed rules and existing rules regarding confidentiality and to provide additional clarity about what information is considered confidential under the program.

However, we urge the agency not to weaken the program nor rules by adopting some of the proposals suggested by the industry. We are in support of OHA resolving actual ambiguities in the rules but disagree, for example, with narrowing the scope of the definition of "in-state" entity and "out of state" entity and limiting what information entities are required to provide as part of post-transaction reviews. In addition, we oppose the changes the industry suggests around tolling during the review period. We firmly believe the tolling provides a clear incentive for entities to respond to the Authority's requests as quickly as possible and a disincentive that will prevent them from simply waiting out the 180-day review period and never providing the requested information.

In closing, we remain disappointed that the Oregon Hospital Association has pushed forward with its legal case that seeks to undermine the HCMO program, which is more necessary than ever.

We appreciate OHA's tireless work since the passage of HB2362 to facilitate an inclusive process for developing this important program.