



July 14, 2026

To:

The Honorable Dr. Mehmet Oz

Administrator, Centers for Medicare & Medicaid Services
Department of Health and Human Services

From:

The Oregon Fire Chiefs Association
The Fire and EMS Chapter of SDAO
The Oregon Fire District Directors Association

RE: CONCERNS REGARDING PROPOSED RULE CMS-2449-P AND MEDICAID DIRECTED PAYMENT LIMITS

The Honorable Dr. Mehmet Oz,

On behalf of the Oregon Fire Chiefs Association (OFCA), Fire and EMS Chapter of SDAO, and the Oregon Fire District Directors Association (OFDDA), we are writing to express significant concern regarding proposed rule CMS-2449-P and its potential impact on critical ambulance services and the communities that rely on them.

The legislative language in H.R. 1 specifically identified four provider categories: inpatient hospital services, outpatient hospital services, nursing facility services, and physician services provided by academic medical centers. These providers are subject to payment caps of no more than 100% of Medicare rates in Medicaid expansion states and no more than 110% of Medicare rates in non-expansion states.

However, CMS-2449-P would have the practical effect of extending these payment limits to all providers participating in State Directed Payment (SDP) programs, including ambulance providers. Ambulance services were not among the provider types identified in H.R. 1 and should not be subject to additional restrictions beyond the scope authorized by Congress.

The Oregon Legislature has established multiple SDP programs to support emergency medical services providers throughout the state. The Oregon Health Authority has received CMS approval for these programs, which have operated effectively, transparently, and responsibly for many years. These programs are essential to maintaining access to emergency medical care for Oregonians and ensuring that EMS providers have the resources necessary to serve their communities.

By expanding the scope of H.R. 1 beyond the provider categories specifically identified by Congress, CMS-2449-P risks imposing significant payment reductions beyond the limits intended by Congress. Such reductions could threaten the stability of ambulance services, restrict access to timely emergency care, and negatively impact the patients and communities that depend on these critical services.

OFCA, the Fire and EMS Chapter of SDAO, and OFDDA respectfully urge CMS to revise the proposed rule to ensure it aligns with the language and intent of H.R. 1 and does not unintentionally undermine essential emergency medical services.

Thank you for your consideration of this important issue.

Respectfully,



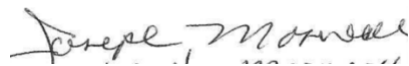
Chief Brian Stewart

Legislative Chair, OFCA
Assistant Chief, Clackamas Fire District



Chief Ben Stange

Chair, SDAO Fire and EMS Chapter
Fire Chief, Polk County Fire District 1



Joseph Morneau

President, Fire District Directors Association