



TO: Oregon HMCO RAC  
FROM: Basic Rights Oregon  
DATE: 7/25/22  
RE: Proposed rule changes

Basic Rights Oregon's mission is to ensure the legal and lived equality of all LGBTQ2SIA+ Oregonians, with a focus on transgender people and people of color. We are supportive of the four categories of services essential to achieving health equity included in the sub-regulatory documents being enshrined in rule as written. We believe these additions will ensure greater health equity for communities we serve.

In particular, Basic Rights Oregon supports the inclusion of pregnancy-related services, as our communities often face unique hurdles in accessing this care. We also are also happy to see OHA further define health care system navigation and care coordination, as these services are necessary to ensure equitable care access—particularly for Oregon's underserved communities.

The only addition we urge the agency to reconsider is shortening the timeline outlined in section 409-070-0022(8) related to when the OHA will publish the entity names and type of emergency transactions that the Authority exempts from review. While the agency has proposed no sooner than 24 months after the transaction has consummated or closed, we believe 12 months would be more appropriate. We understand that some previous RAC members were concerned that disclosing these transactions as they happen could potentially create a destabilizing effect in our healthcare market; however, 24 months before the public learns that a transaction did not require review seems excessive.

Thank you for your work to make HCMO more accessible and equitable.