

DATE: August 28, 2025

TO: Hearing Attendees and Commenters –
Oregon Administrative Rules chapter 333, divisions 250 and 255 –
“Ambulance Service and Ambulance Vehicle Licensing Requirements”

FROM: Brittany Hall, Hearing Officer and Administrative Rules Coordinator

cc: Dana Selover, Section Manager
Health Care Regulation and Quality Improvement

SUBJECT: Presiding Hearing Officer’s Report on Rulemaking Hearing and Public
Comment Period

Hearing Officer Report

Date of Hearing: July 21, 2025, via Microsoft Teams

Purpose of Hearing: The purpose of this hearing was to receive testimony regarding the Oregon Health Authority (OHA), Public Health Division, Health Care Regulation and Quality Improvement section’s proposed permanent adoption and amendment of administrative rules relating to the licensing requirements for ambulance service agencies and ambulance vehicles including the license application process, qualifications for licensure, operations, policies and procedures, personnel, EMS medical direction, required notifications, ambulance vehicle construction requirements, ambulance vehicle equipment requirements, infection control practices, and violations.

Administrative rules are being adopted and amended to improve the accuracy, structure and clarity of the rules; align language with current processes including simplifying procedures; clarify licensing requirements; address concerns regarding ambulance service agencies responding to calls in accordance with an ambulance service plan; address enforcement issues for violation of ambulance service vehicle regulations; address confusion around ambulance vehicle construction requirements; and ensure that ambulance vehicles are properly cleaned and decontaminated or disinfected to ensure compliance with federal standards.

Hearing Officer: Brittany Hall

Testimony Received: Two individuals provided testimony at the hearing.

Other Comments: Three individuals or organizations submitted written comments to OHA within the period allotted for public comment, which closed at 5:00 PM on July 22, 2025. Written comments are attached to this report as **EXHIBIT 1**.

Summary of Comments and Agency Responses:

In oral testimony and written comments, OHA heard concern about the change of date of November 1, 1994 to June 1, 2002, before which an ambulance box construction or remount will not be issued a license without an exception process. It was noted that the date is “arbitrary” because the new date “has no justification in published literature or Commission on Accreditation of Ambulance Service (CAAS) or [National Fire Protection Association] NFPA published standards,” nor has there been “any documented patient or EMT safety rationale for this date change.” Removing ambulance modules from service with construction dates prior to June 1, 2002 and replacing them with new ambulances would be cost prohibitive to agencies, and would remove ambulance modules from service that perform essential lifesaving work around the state.

Oral testimony also questioned “what are the major gains in the industry in terms of safety to our patient that we transport” if the timeline is changed from 1994 to 2002.

It was requested that the November 1, 1994 date remain in the rules and not be changed to June 1, 2002.

Agency response: The Oregon Health Authority (OHA) thanks respondents for their comments. After consideration of the information provided including the data on the number of remounted vehicles operated by Metro West Ambulance and its subsidiary agencies, the OHA has revised the rule to continue to allow an ambulance box constructed on or after November 1, 1994 for a remount. Despite the legacy clause added by the OHA in the rule for currently licensed new and remounted vehicles, the OHA acknowledges the potential impact to the communities served by these ambulance agencies should another remounted chassis be necessary.

The following changes have been made to OAR 333-255-0060:

OAR 333-255-0060

...

(8)(a) The Authority shall only approve an application for a remounted ground ambulance vehicle if ~~the patient care compartment was originally manufactured on or after June 1, 2002; there is documentation that supports that the patient compartment was manufactured on or after June 1, 2002; and~~ the remounted ground ambulance vehicle complies with:

(A) CAAS, GVS, v.2.0 Edition, Section F, dated July 1, 2019, incorporated by reference;

(B) CAAS, GVS, v.3.0 Edition, Section F, dated July 1, 2022, incorporated by reference;

(C) NFPA 1917, 2019 Edition, Chapter 10, incorporated by reference; or

(D) NFPA 1900, 2024 Edition, Chapter 34, incorporated by reference.

(b) The remounted ground ambulance vehicle shall show evidence of the CAAS GVS remount standard compliance sticker, or the NFPA 1917 or NFPA 1900 certification and payload. Documentation showing that the NFPA 1917 or NFPA 1900 remount standards have been met may be substituted for the NFPA 1917 or NFPA 1900 certification and payload.

(c) The licensed ambulance service shall maintain appropriate documentation confirming compliance with the applicable remount standard specified in this rule.

(9) The Authority may approve an application for a remounted ambulance vehicle that does not meet the requirements under subsection (8)(a) of this rule if:

(a) The vehicle was remounted between June 1, 2002 and June 30, 2022;

(b) The patient care compartment was originally manufactured on or after ~~November 1, 1994 June 1, 2002~~, and there is documentation that supports that the patient compartment was manufactured on or after ~~November 1, 1994 June 1, 2002~~; and

(c) The vehicle is inspected by a certified EVT who provides the ambulance service agency with documentation that the ambulance is in good operating condition and meets minimum safety requirements.

(d) The licensed ambulance service that obtains a license for an ambulance vehicle under this rule shall maintain appropriate documentation confirming compliance with this rule.

In written comments, OHA heard concern about the proposed change that requires use of the 2020 edition of the US Department of Transportation Emergency Response Guide. It was noted that the guidebook is released every four years and that the 2024 edition is already being used by some agencies. It was requested that rule text be amended to allow use of the “current edition.”

Agency response: The OHA thanks respondents for information on the latest version of the US Department of Transportation's, Emergency Response Guidebook. The OHA is required to provide a dated version and will update the Emergency Response Guidebook to reflect the 2024 version. OAR 333-255-0072 and OAR 333-255-0082 have been revised as follows:

OAR 333-255-0072

(3) Required equipment for a ground ambulance vehicle that is used by an ambulance service to provide basic life support includes but is not limited to:
(w) The U.S. Department of Transportation, 2024 "Emergency Response Guidebook, (A guidebook for first responders during the initial phase of a transportation incident involving hazardous materials/dangerous goods)."

OAR 333-255-0082

(2) The following prehospital scene patient care equipment is required on all prehospital scene responses:
(m) Miscellaneous equipment:
(A) The U.S. Department of Transportation, 2024 "Emergency Response Guidebook, (A guidebook for first responders during the initial phase of a transportation incident involving hazardous materials/dangerous goods)."

Shawn Baird
[REDACTED]
Hillsboro, Oregon 97124
[REDACTED]
[REDACTED]

Attn: Mellony Bernal
Oregon Health Authority
Public Health Division
800 NE Oregon Street Suite 465
Portland, Oregon 97232
publichealth.rules@odhsoha.oregon.gov

Filing Caption: Ambulance Service and Ambulance Vehicle Licensing Requirements

July 18, 2025

Dear Ms. Bernal,

Please accept this comment on behalf of Metro West Ambulance, Medix Ambulance, Pacific West Ambulance, Woodburn Ambulance, Pioneer Ambulance, Mid-Valley Ambulance, Umpqua Valley Ambulance, and Bay Cities Ambulance.

These eight companies provide 911 response and transport as well as essential interfacility transport across Oregon. They include exclusive 911 ASA franchise holders as well as exclusive statewide health system ambulance transport contracts. In many cases they are the ONLY access to healthcare for many miles for patients in the worst moments of their lives.

As subsidiaries of Commission on Accreditation of Ambulance Service (CAAS) accredited Metro West Ambulance they all endeavor to the highest industry standard for operations.

Proposed rule changes to OAR 333-250-0060 (8)(a) through 9(d) which implement a date of June 1, 2002 as an arbitrary date before which a ambulance box construction or remount will not be issued a license without an exception process. This is a new date that has no justification in published literature or CAAS or NFPA published standards.

The ambulance services listed here currently utilize thirty five ambulance modules with construction dates prior to June 1, 2002 and remounted on new, chassis across Oregon. These ambulances perform essential lifesaving work around our state. All have been remanufactured and remounted in accordance with current CAAS and OHA standards. None of them have presented any safety concern or hazard to our patients or employees due to a construction date between November 1, 2019 (current standard) and June 1, 2002. We are not aware of any documented issues for any ambulance service in Oregon related to module construction during this window of time.

Removing those thirty five ambulances from service and replacing them with new ambulances, using the estimated cost provided by OHA in this proposed rule, would cost the company between \$9,800,000 and \$10,500,000

That would be ten million dollars in an economic environment where ambulance services are struggling to hire a workforce and make regular operational expenses. It would simply not be possible.

We do not believe that there has been any documented patient or EMT safety rationale for this date change. Any required upgrades due to changing CAAS 4.0 standards, which will remain the OHA standard, may be accomplished during the rigorous remount process regardless of original construction between November 1, 1994 and June 1, 2002.

Our remount process involves a thorough selection and inspection prior to any decision to remount. An appropriate chassis mayst be ordered as well as assuring that the original module has the necessary KKK and Star of Life Certificate. An examination of the structure to ensure uncompromising integrity is then undertaken.

The inspection reveals any underlying problems that will need to be addresses or if the unit is unsuitable for refurbishing. This includes the welds, fasteners, hinges and latches, any rust or weakness and many more items.

Internally systems are upgraded as necessary such as seat belts, wiring, oxygen and suction systems, flooring, lighting, centralized locking, anti theft, upholstery and surveillance to name a few. There is a complete detail and paint of the module.

In summary, the module undergoes exhaustive inspection, upgrade, and remanufacture prior to being professionally mounted on a new chassis by our FMVSS registered fleet department.

We urge you to protect access to EMS and ambulance services across Oregon and delete any proposed change from November 1, 1994 to June 1, 2002 in these rules.

Sincerely,

Shawn Baird

From: [Jan Acebo](#)
To: [Public Health Rules](#)
Subject: Proposed Changed to 333.250 and 333.255
Date: Friday, July 11, 2025 8:32:22 AM

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Good morning.

Thank you for disseminating the notice of proposed changes.

My concern is the change to the US Department of Transportation Emergency Response Guide requirement. The proposed change requires a 2020 Guidebook.

Please note that this guidebook is released every four (4) years. The 2024 ERG was released last year. Therefore, we are already four-years outdated if the "new" requirement will be 2020.

[Emergency Response Guidebook 2024 Edition | U.S. Government Bookstore](#)

AMEND: 333-255-0072

RULE SUMMARY: Amend 333-255-0072

Revises equipment requirements for an ambulance vehicle replacing neonate sized oxygen nasal cannula with tubing

with infant size; clarifies the number of soft restraints needed; **updates the version of the Department of**

Transportation, Emergency Response Guidebook from 2016 to 2020. Removes requirement for a short backboard or equivalent and commercially packaged or sterile burn sheets. Removes outdated rule reference.

Thank you
Jan

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Jan Acebo, EMT-P
EMS Coordinator
MULTNOMAH COUNTY HEALTH DEPT.
Emergency Medical Services

WEB SITE: <http://web.multco.us/health/emergency-medical-services>

This email was encrypted for your privacy and security

From: [David Lapof](#)
To: [Public Health Rules](#)
Subject: Rule Making Comments OAR 333-250-and 255
Date: Wednesday, July 2, 2025 11:39:20 AM

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COMMENTS

AMEND: 333-255-0072

RULE SUMMARY: Amend 333-255-0072

(w) The U.S. Department of Transportation, 201620 "Emergency Response Guidebook, (A Guidebook for First Responders During the Initial Phase of a Dangerous Goods/Hazardous Materials Transportation Incident)";¶

I would removed the date of the DOT Guidebook and make “**Current Edition**” as the 2024 Guidebook is current in use and the guidebook is updated frequently

I would also like to know who the representatives and the agencies that were on the rule advisory committee (RAC).

Thank you

Dave Lapof, Fire Chief

for Siletz Fire District & Toledo Fire Department

[REDACTED]

[REDACTED]

Siletz, OR 97380

[REDACTED]

[REDACTED]

[REDACTED]