



February 23, 2026

**Via Email [Elizabeth.Ross@omb.oregon.gov](mailto:Elizabeth.Ross@omb.oregon.gov)**

Elizabeth Ross, Rules Coordinator  
Oregon Medical Board  
1500 SW 1st Ave, Suite 620  
Portland, OR 97201

**Re: Public Comment on Proposed Rule OAR 847-005-0005**

Dear Ms. Ross,

The Oregon Medical Association (OMA) is a nonprofit organization that represents physician and physician associate members in the State of Oregon. We are offering public comment on the proposal to amend OAR 847-005-0005 to increase registration and workforce survey fees.

We value that as a semi-independent agency in Oregon, the Oregon Medical Board (OMB) serves as a self-funded agency and steward of licensure fees paid for initial and renewal registrations. We also understand that similar to the medical practices many of our members are affiliated with that costs of providing services are ever-increasing and at higher rates than anticipated. We are mindful of a prior increase in licensure fees in 2024 after not having needed to raise fees since 2013. Our consistent comment and request then and now is that OMB continue its transparent work to ensure that all license fees and any future increase in fees are used in the most efficient manner possible.

We also note the doubling of a fee from \$2 to \$4 per year that is re-directed to the Oregon Health Authority (OHA) to conduct a workforce survey and report on the data. We urge the OMB to request that OHA also be good stewards of those resources and provide timely and accurate data that policy makers are able to use to make informed decisions about Oregon's health care workforce.

Thank you for the opportunity to provide public comment, and we are glad to respond to questions from the OMB if needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Bonanno". The signature is fluid and cursive, written over a light blue horizontal line.

Mark A. Bonanno, JD, MPH  
General Counsel and Vice President of Health Policy