

Public Comments

The [Health Care Market Oversight](#) (HCMO) program reviews proposed health care business deals to make sure they do not harm people and communities in Oregon. This document presents public comments related to the HCMO review of 039 OHSU-Legacy. OHA accepted public comments before the preliminary review period. Public comments were received via email to hcmo.info@oha.oregon.gov, voicemail, or by filling out the [Public Comment Form](#). Comments are presented below in the order received and may include typos or misspellings. Personal contact information for individuals has been removed.

OHA expresses no views on the substance of these comments, and their publication does not constitute an endorsement by OHA of the views expressed.

You can get this document in other languages, large print, braille or a format you prefer free of charge. Contact us by email at hcmo.info@oha.oregon.gov or by phone at 503-945-6161. We accept all relay calls.

Comments received before the notice was filed (08/21/23-10/04/2024).

1. Subject: Comment on proposed OHSU/Legacy Health Merger, 08/21/23

I am a resident of Portland, OR. I am writing to express my opposition about the recently announced merger between Oregon Health and Science University (OHSU) and Legacy Health. If and when there comes a time for public comment on this transaction, I ask that this letter be included and considered as a public comment.

The health care market in Portland is already exceedingly constrained. Excluding the VA, there are four major hospital administrators in Portland: OHSU, Legacy Health, Providence, and Kaiser Permanente. The merging of Legacy with OHSU would reduce that number to three. Last December, all hospitals in Portland implemented crisis standards of care because the “number of patients presenting for care exceeds

capacity”¹. Hospitals in Portland as it is are unable to meet residents’ medical needs, with wait times for hospital admission from the ER higher than the national average².

I believe that this merger would lead to an increased squeeze on Portland’s health care market and worsen patient access to care. Of the hospitals in Portland, OHSU experiences the highest wait time for hospital admission from the ER *and* the highest wait time to receive a bed once admitted³. It is notable that these times are substantially faster for Legacy Good Samaritan Hospital and Legacy Emanuel.

I can speak to this on a personal level. I am a trans woman and need to receive gender-affirming surgeries. The wait for these surgeries at OHSU is anywhere from 2-5 years depending on the procedures. I switched to Legacy and have surgery consultations scheduled within the next month. This would not be possible for me if I didn’t have the *choice* to seek care from a different hospital. The fact that I had a choice given my insurance plan is already a privilege.

Perhaps this merger would allow OHSU to better handle their client load. But I think the merger would have a negative effect on the entire healthcare market, reducing patient choices for care and increasing wait times for patients at Legacy, Providence and Kaiser.

For capitalism to work, there needs to be competition. OHSU is already a dominant player in the Portland healthcare market, having made an affiliation agreement with Adventist Health in 2017⁴. The answer to crisis-level demand for care is not consolidation.

The answer is making healthcare training for future doctors, nurses, PAs, MAs, and technicians affordable (if not *free*) and accessible. The answer is allowing new healthcare players to enter the market to create competition – the most recently established hospital in Portland was in 1941. The answer is millionaire hospital directors divesting their salaries back into patient care. The answer is moving away from an insurance model and making healthcare *affordable without insurance*.

This merger will only exacerbate the conditions that led to our current healthcare crisis in the first place. It is for this reason that I oppose this merger and oppose the growing trend of health care consolidation in Oregon.

Thank you for your time in hearing my concerns. If and when public engagement on this transaction is solicited by your Health Care Market Oversight team, I will continue to be vocal in my opposition.

2. Subject: Hurting Oregonians, 07/09/2024

The healthcare merger for OHSU and Legacy health is a monopoly which will hurt Oregonians. Do not allow this merger. This merger would take away Oregonians choices and will lead to more health disparities and only look to profit margins.

This will hurt doctors, nurses and ultimately Oregonians.

Did this happen due to a law change? Stop the merger, this is big corporate greed. The leaders of legacy have been giving themselves bonuses of quarter a million dollars (who knows exactly how much has been wasted on self indulgence). Then they start cutting essential services like housekeeping, social workers and other staff. Taking away the competitive nature of healthcare will lead to more deterioration, as a nurse who just wants to help people, its heartbreaking.

The decision to change to Lab Corp. has caused death at Legacy. Has it been We are appalled at the lack of oversight and this healthcare decision. We have frequently not had extra platelets which means if a bleeding mom, surgical or medical patient in need will die. This deterioration is in a long list of poor decisions.

3. Subject: OHSU Legacy Merger, 07/24/2024

I am writing to protest the merger of OHSU and Legacy. I am a patient of both systems and an employee of OHSU. I specifically chose the Legacy Kidney Transplant program because they participate in the National Kidney Registry. If I had to use the OHSU transplant program, I would still be on dialysis instead of living a full life after transplant. Being able to utilize the national matching system allowed me to get a perfect match quickly, rather than having to do a direct donation.

Also, I object to consolidating healthcare into large conglomerates. Capitalism works when there is healthy competition. Merging these two large systems will reduce choice for patients as there will only be Providence health systems as an alternative since Adventist is now in the OHSU fold. There will be less choice for workers who object to OHSU's personnel and pay policies. It is unsound economic policy to allow this merger.

I am willing to testify in person with my patient story and my thoughts as a healthcare worker.

4. Ohsu merger, 09/18/2024

Please say no to yet another OHSU merger. Hospitals should not be monopolized!

The Rev. Fr. JUAN DIEGO (Edgar) Cedeno Luevano n/OSB

5. No subject, 9/30/2024

I am deeply concerned about this merger, especially as a patient at OHSU Richmond. As a patient with the Oregon Health Plan (OHP), I have faced months of wait times to see a primary care physician. The entire OHSU system is understaffed and fails to timely provide appointments to patients within the timeframes set by the federal government for Medicaid programs. Additionally, the President of OHSU recently made significant layoffs and gave himself and other leaders raises. I believe this merger will further reduce the quality of care and is not in the best interest of Oregonians. OHSU needs to step up its game and ensure patients aren't waiting months to see a doctor. Also it needs to increase staffing so that doctors caseloads are not so high they cut corners in patient care.

6. No Subject, 10/2/2024

I do not find the new proposed name appealing. OHSU Health seems duplicative, when you say the acronym in its full version, Oregon Health Science University Health. Please reconsider the name to be OHSU Legacy.

About HCMO

The Healthcare Market Oversight Program reviews proposed health care business deals to make sure they support statewide goals related to cost, equity, access, and quality. For more info, you can connect with HCMO staff:

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