

Public Comments: SCAN-CareOregon

This document was last updated on December 6, 2023.

This document includes written public comments related to Oregon Health Authority's Form A review of the transaction between SCAN Group and CareOregon. OHA received written public comments via email at FormACareOregon.CCO@oha.oregon.gov. This document presents the comments as 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.

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Public Comment

1. Opposed to new Care Oregon proposal

Received 11/9/23

170 million is a heck of a big pot of money to "join" if care if current benefits will remain same.

Schools need \$ and ODOT for winter roads could benefit for example. We've got good healthcare here already ! 170 million is ridiculous.

Also I don't care for managed Medicare. It looks good on surface but has alot of hidden non payments. Example: nursing home benefits like after a stroke or surgery. Lucky to get paid days or are given smaller amounts than regular medicares 20 day

benefit. Look for the loopholes. My IV drug every 8 wks wouldn't be covered same if had Advantage plan. Vote is NO.

Cindy Laird

2. Health care merger

Received 11/9/23

I say NO to the merger that would health care for 500,00 Oregonians and billions of dollars to California. Health care is hard enough to get and very expensive the way it is. when providers get bigger and more distant, it only gets worse. We need local health care, not mega businesses. Mega health care businesses don't care about individuals or communities.

I vote a strong NO on this merger.

Sincerely, Ann Snyder

3. merger Oregon and california care Oregon healthcare!

Received 11/9/23

no no no to this ! Oregon takes care of its own. Do not merge with Ca. This healthcare system is broken in Ca. I know first hand!

No to this better.

Sincerely Ann

Ann Watters RPE

4. Opposition to merger

Received 11/9/23

To whom it may concern,

I am writing in opposition to the Care Oregon merger with Scan Group. I do not like that Scan Group is not in Oregon and that these large mergers rarely equal better care for patients.

Thank you,
Lori Kunkel

5. I Oppose Allowing CareOregon to Give Oregon Resources to Profiteers

Received 11/9/23

Good afternoon,

I can see no way that sending \$120 million tax dollars allocated for the care of Oregon residents to an out of state for-profit company can be in the interest of any Oregonian other than those few who stand to pocket some of those tax payer dollars.

Please prevent this profiteering theft of Oregon Resources.

Sincerely,

Kirk Foster
Wapato Shores, Inc.

6. Opposing CareOregon

Received 11/9/23

I oppose the proposed merger of CareOregon and SCAN Group to manage health care for 500,000 Oregonians. I believe management of CareOregon should stay in-state, and a merger will only dilute the quality and cost of patient care.

I urge the Oregon Health Authority to deny the proposed merger. Do not make health care for Oregonians more complex or more costly.

Steve Poisson
Stayton, OR

7. CareOregon/Merger

Received 11/9/23

Hello, I just want to register my opposition to the merger between CO and Scan. Keep matters Oregon in Oregon. I don't want to see us become a Calif based conglomerate. Oregon is where my clients are and their medical care is best administered here.

Thanks, Anya Valsamakis, LCSW and Care Oregon behavioral health provider.

8. Don't approve CareOregon merger with SCAN Group

Received 11/9/23

To Whom This Concerns:

I strongly oppose the merger. Giving Oregon taxpayer dollars upfront to the California corporation is not in the best interest of Oregonians receiving care from CareOregon.

Profit over people is not in the best interest of recipients of care or Oregon taxpayers,

Respectfully,

Charlotte Maloney
Retired occupational therapist
Eugene, OR

9. I object to the CareOregon merger

Received 11/9/23

As a rural resident we are already under served in our health/medical care. My experience is that the larger an organization becomes, regardless of its intentions, the more difficult it is to manage.

This is in spite of supposedly having more resources available.

We would do better to invest in educating more doctors and other health care workers, so they can serve more individuals with more attention.

I feel this merger would only warehouse our healthcare into a more impersonal entity. It's already difficult to manage as it is.

Jackie Wolfe

Waldport, OR

10. Opposition to proposed Care Oregon SCAN merger

Received 11/10/23

Hello,

I oppose the proposed Care Oregon SCAN Merger.

It is unclear to me how this merger will have any benefit to people in Oregon, either the people who receive Oregon Health Plan services, or Oregon Tax Payers.

There is no reason for Oregon Taxpayer dollars to go to a group based in California.

Care Oregon is a profitable non-profit. I would rather see them invest in their own communities rather than conglomerate with an unrelated company.

Thank you for your time.

--Colin Sanders
OHP Advocate

11. CareOregon merger

Received 11/10/23

Please don't undertake this proposed merger. It would be bad for Oregonians. In both my personal and professional lives, I have seen how much good CareOregon does for regular Oregonians. A merger would likely reduce access to care that the people of Oregon already decided we want our citizens to receive. We don't just have a right to health care. We have a right to easily accessible, high quality health care.

CareOregon has been providing that. Don't increase costs and let care suffer so that you can increase revenue for an out-of-state organization.

-- Emily Hudson-Evalt

12. CareOregon Merger

Received 11/10/23

I want to offer an opinion about the proposed CareOregon merger with Scan Group.

In a word? No. NO!

I work in Healthcare Informatics, and have worked in healthcare and hospitals in some capacity for the majority of my life. I've seen first hand what it's like when a healthcare organization gets taken over - and it's always wrong. Wrong for the workers, wrong for the patients, and wrong for the community. I have literally seen people die because of mergers and shutdowns. Is that really what we want to do to Oregonians?

I was a traveling consultant and ended up at Mission St. Joseph in Asheville, NC. MSJ (Mission St. Joseph) Healthcare is a premier healthcare system operating in Western North Carolina, and was taken over by an out-of-state organization, HCA. HCA stripped MSJ of their most valuable assets - firing people and increasing patient for those that stayed. It created a toxic environment that exists to this day. And if you read up on how it's going, you'll see that patient satisfaction is down, as is employee morale. What's gone up is the waits for beds and the number of diversions to other facilities, and problems with patient care. And you know what else is up? HCA profits. HCA uses hospitals like Mission St. Joseph to line their pockets and give outrageous bonuses and salaries to out-of-state executives who already have far more money than they could ever spend.

Is that what we want to happen in Oregon? I don't.

That's why I oppose CareOregon's merger with Scan Group.

Walter Hopgood, CPhT

13. Oh no Care Oregon

Received 11/10/23

I oppose this merger, not a good fit for Oregonians. I may need to change my son's plan as this won't help him, just cause more red tape and stress dealing with out of state folks. Please don't do this.

Marie Price

14. possible CareOregon merger

Received 11/11/23

To whom This Concerns:

I strongly oppose this merger. I do not support giving Oregon taxpayers millions to become the parent company of the "non-profit" ScanGroup. The proposed merger may be a gain for executives, but I don't see how that improves care provided by CareOregon. How will the leadership, control and governance improve with people out-of-state?

All companies offering Medicare Advantage plans can keep up to 20% of the federal dollars they receive as profit to keep their organization operating. I question what the salaries and bonuses the executives receive annually in this "non-profit." I question what the denial rate is for "prior authorizations."

Oregonians want fellow Oregonians to receive the care they need without spending funds operating a Medicare Advantage program over several states.

Thank you for this opportunity to comment,

Charlotte Maloney
Retired occupational therapist
Eugene, OR

15. Merger

Received 11/11/23

Why would Oregon allow California to manage our healthcare system with our dollars? Absolutely vote No to such a merger.

Rose Fusetti

16. Care Oregon

Received 11/11/23

I have been a supporter of Health Care for all for many years. I was encouraged by the passage of our first steps in bringing such to Oregon.

Since I have jury duty on the day the zoom meeting is being conducted, I am writing this email.

I am opposed to have the proposed merger more forward. I believe it will dilute/obstruct a formation of a true Healthcare for all system.

Oregonians have taken important steps forward to create Universal Health Care to have it undermined.

Greatly Concerned,

Jane Bilodeau

17. Care Oregon

Received 11/11/23

I am a retired physician, who spent half of my career in The Dalles.

I oppose selling our obligation to care for one another to a for profit corporation. If I have learned anything from 40 years of medical practice it is that the profit motive is toxic to care. This is not a vague statement, it is a lived fact.

Don't fall for the efficiency argument, adding systems of management is how we became the most expensive health care system in the world. This again is not a vague statement, it is a lived fact.

Just don't do it. Fight the problems here with local resources. We won't be perfect, but we will be delivering the goods to our patients, not to an out of state entity.

Rolf A Nesse MD

18. CareOregon

Received 11/11/23

It is a bad idea to allow CareOregon and SCAN Group to merge.

OHA is already under-funded to provide sufficient oversight of CCOs. There is no way that Oregon regulators will be able to adequately supervise the care being provided to Oregonians by SCAN Group.

"\$25 million to start a charitable foundation to serve Oregonians" is a drop in the bucket. The Northwest Health Foundation started with a LOT more resources and has done some great work but, in exchange for the \$25M, letting Blue Cross go private as Regency (in 1997) was a terrible deal for many Oregon residents. (Remember that CareOregon began as the free PUBLIC health clinics of the Multnomah County Health Department. Many of their patients were not eligible for Medicaid/Oregon Health Plan and now they will be profit-generating widgets in the business plan of a California corporation.)

Kenneth D. Rosenberg, M.D., M.P.H.

19. CareOregon

Received 11/13/23

I am sharing my concerns about the CareOregon SCAN merger:

- One of the major elements of the move to Coordinated Care Organizations was that the local community would oversee Medicaid/Oregon Health Plan insurance plans. If CareOregon members are managed from California, what happens the local management of Medicaid/Oregon Health Plan insurers and most importantly, with patient care?
- There are there are three CCOs that oversee care in areas that CareOregon offers membership. But, I assume at least for HealthShare, CareOregon is the largest health plan in the most populated area of Oregon. This is the Oregon Health Plan, which was created for Oregonians. Why have control switch to a California entity?
- Medicare Advantage is certainly more lucrative than Medicaid and if my past knowledge is correct, CareOregon offers a Medicare Advantage plan with most of its members eligible for the Oregon Health Plan. Assuming HealthRight will offer a Medicare Advantage plan that might appeal to a larger segment of Medicare recipients, how will it actually compete with the plans already available? From personal experience, I know there are 58 Medicare Advantage plans available in Multnomah County. I doubt HealthRight will offer anything much different from what is currently available.

Lastly, why send tax monies from Oregon citizens to an entity based in California? (i do know that federal tax monies also fund Medicaid.)

I oppose this merger.

Diana Wolford

Retired healthcare quality and process and improvement professional (former CareOregon employee, 2005-2013)

20. I am opposed to the Scan/CareOregon merger

Received 11/13/23

To whom it may concern-

I am opposed to the merger of Care Oregon and SCAN:

I have never seen a benefit in the health care industry where bigger is better: longer wait times, inefficient and vague customer service, lack of consistency and organization. Incorrect billing and higher copays, etc.

The citizens of Oregon have pride in our uniqueness and have more often than not have creative ways of dealing with our needs. I don't want to see citizen involvement diluted for the sake of efficiency.

We have different political structure, different climate, different geography.

Again, I am opposed to this very ill-advised merger.

Tony Williamson

21. No deal with Scan Group with Oregon Care

Received 11/14/23

No Deal!

Bonnie Waterston

22. Care Oregon Merger

Received 11/14/23

I do not want the Care Oregon/SCAN Group merger. As an Oregonian, I will see and experience reduced benefits and services. The health of Oregonians is personal; it should not be treated as if it's just business.

Sincerely,
jan rose
Estacada, OR

23. Care Oregon Merger Proposal

Received 11/14/23

Dear Dr. Sejal Hathi:

As an Oregon resident, voter and healthcare recipient, I am registering my concern about this proposed merger.

The proposal comes at a time when our healthcare system is suffering from funding inefficiencies caused by the very type of merger being proposed...a continual "race to the bottom" that squeezes out profits for corporate executives to the detriment of both healthcare workers and patients.

The model is broken and is ill-timed especially when you consider that it comes at a time when voters have supported a universal health plan and Governor Kotek has signed Senate Bill 1089 creating a Universal Health Plan Governance Board to flesh out a publicly funded, single-payer universal health plan for all Oregonians.

Frankly, I suspect this proposed merger is just another attempt to sabotage the will of the people and I believe Oregonians will see it as such.

Congratulations on your appointment and thank you for your consideration.

Andrew Seles
Ashland, Oregon

24. CareOregon Merger

Received 11/14/23

I oppose the merger. This seems to be taking public funds and redirecting them to private corporations instead of to health care providers.

We need a public run health care system that focuses on prevention and community and not disease and profits.

Andra Hollenbeck
Ashland, OR

25. CareOregon Merger

Received 11/14/23

To whom it may concern:

I have just read this commitment on your website under “About OHA”: “The Oregon Health Authority is at the forefront of lowering and containing costs, improving quality and increasing access to health care in order to improve the lifelong health of Oregonians.”

History provides great education and wisdom should we be willing to listen. Giant mergers do not contain costs or improve quality for the greater public. Giant mergers provide a few individuals with financial gain for which the greater public pays an unacceptable premium. Giving over authority of Oregonians healthcare to a California giant is neither wise nor equitable.

It is my most sincere desire and hope that your committee revisit your commitment to the lifelong health of Oregonians and sends this merger idea into the shredder where it belongs.

Thank you for your consideration.

Sincerely, Gracie Campbell

26. Merger

Received 11/14/23

It sounds like money leaving Oregon. I would be much happier if the money didnt end up going to California.

Paulie

27. Merger

Received 11/14/23

NO! NO! NO! No merger of Care Oregon with SCAN!

Judith Beck

28. careoregon

Received 11/15/23

I have read the pro's and cons of this proposed merger and oppose the deal. Sending Oregon money out of state and into a larger organization that will have oversight of health care is a bad idea. Keep careoregon in Oregon.

Joe Highfill
Tigard, OR

29. Care Oregan Merger

Received 11/15/23

To whom it may concern,

As a PNP, I object to the proposed merger. I believe it will make it more difficult to get approvals, appeals, prior auths for meds and other services. I agree with studies that show mergers of this type don't improve services or cost savings.

I am a parent of an adult child who will be relying on Medicaid in the coming year because we (my spouse and I) can't afford private insurance for her any longer. I object to this merger because I don't want to have her health insurance managed by an outside group. As noted above, big mergers don't usually improve services or costs. There are also studies that show that privatizing programs such as welfare return to work programs do nothing for the client and just make money for the private company.

As a tax payer, it seems ridiculous to send Oregon money to California when there is no guaranteed benefit to Oregonians.

Sincerely
Deborah A. Welte CPNP

30. CareOregon Merger

Received 11/15/23

Hello,

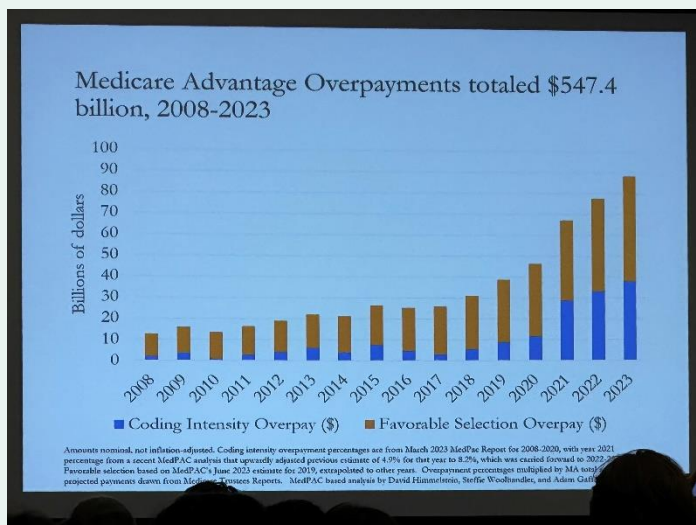
My name is Hayley Palmer and I'm a parent to a child with many disabilities and is considered medically fragile. Our family has a unique situation where we co-parent between two different states: OR and WA. This has been a new transition for us and we've already run into a scenario where I needed to take my child to urgent care but because I couldn't take her to the nearest WA location, we took her to the Emergency Department at Doernbechers instead. This stay in the ED probably cost CareOR much more money than an Urgent Care visit. Not being able to access to closest to me medical care is a disruption in care and a costly one at that. My fear is that one day I may have to call 911 and the first responders would have to drive her 30 minutes over the bridge because that's the closest Oregon location, rather than taking her to the nearest medical facility for prompt and emergent treatment. Having the ability to take my medically fragile child to a WA health system would be monumental for us.

Hayley Palmer, LPN
Procedures Nurse

31. CareOregon merger

Received 11/15/23

Hello, Here is a graph I would like to share as part of my public testimony below.



- Speaking in favor of the merger
- Medicare Advantage (MA) for-profit companies are some of the most egregious profiteers in the country, and privatized Medicare has not once yielded savings for the program. The Medicare Payment Advisory Commission (MedPAC) could not say conclusively whether care outcomes fared better under MA. In addition, beneficiaries of MA must contend with heavily limited networks, whereas traditional Medicare has a wide array of coverage options.
 - MedPAC analysis from 2008-2023 (see graph above) shows Medicare Advantage overcharges taxpayers by \$547 B (\$88 B this year alone), which is more than enough surplus money to provide critically needed benefits to all Medicare and Medicaid beneficiaries, but this money was not returned to the federal government or taxpayers but was used solely for profit,
 - This is "a game of delay, deny, and not pay", for example the Stillwater Medical Center in OK has a "22% prior authorization denial rate for MA plans, compared to a 1% denial rate for traditional Medicare."
- Aggressive recruitment: MA Advertisements: 640k TV commercials (90% of TV ads), brokers are paid \$50-762 per sign up, and many employers require their retirees to enroll in MA.
- I would support the formation of a regional non-profit competitor to help provide coverage of care that is not profit motivated and is based on the well-established community-based missions of these regional organizations.
- I've spoken with many SCAN and CareOregon employees who support this merger as it would allow them to cover more people, provide greater services, and improve operational and quality performance.

Yours,

Bruno

Richard Bruno, MD, MPH, FAAFP, FACPM, AAHIVS
Family & Preventive Medicine physician
Portland, OR

32. SCAN Merger

Received 11/15/23

My name is Dustin Contreras from Multnomah County and I am on OHP. I recently began volunteering for Be A Hero and Healthcare for ALL Oregon but am not speaking on behalf of either today. I've heard a lot of bad things about the healthcare outcomes of Medicare Advantage so the idea of a group that provides Medicare Advantage taking part in providing my healthcare is concerning to me. I have seen no proof that SCAN is somehow better than the rest of the Medicare Advantage system as of yet. It also appears strange to me that Care Oregon will send so much money to this new organization but will only definitively receive a fraction of that money back to pursue healthcare in Oregon. Finally, I have seen many financial entities promise to maintain or improve service, but when provided the choice between maintaining the service or increasing profit, they break their promise in favor of profit. As such I would like some legal obligation to prevent this new organization from reducing healthcare outcomes or customer service availability. To be very clear however, at this time I am firmly against the merger as I have seen no proof that it will improve care.

33. Opposed to SCAN Care Oregon Merger

Received 11/16/23

As a nurse practitioner at a local Federally Qualified Health Center taking care of Jackson Care Connect patients since 2012, I have personally experienced the role of Coordinated Care Organizations in Oregon from their beginning. The most important question for this merger is how will this merger impact care of OHP patients in Oregon? My experience with primary care is that successful care depends on local connections. The day-to-day care provided to patients depends on the success of PCPs, specialists, therapists, pharmacies, and nonprofits to work together. These care providers must be able to shift and adapt as changes occur locally. Time is critical in providing effective care. Bureaucracy creates extra obstacles to overcome on a daily basis. These obstacles create delays in care, cost money and complicate local care delivery.

Bigger has not been shown to be better with patients. A Harvard study of hospital mergers conducted in 2020 showed the opposite. Data was collected by the Centers for Medicare and Medicaid Services between 2009 and 2013. They analyzed the success of these mergers using variables such as 30-day readmission and mortality rates, as well as clinical measures such as timely antibiotics treatment of patients with

bacterial pneumonia. The researchers also factored in patient experiences, such as whether those who received care at a given hospital would recommend it to others. For their analysis, the team compared trends in these indicators between 246 hospitals acquired in merger transactions and unaffected hospitals. The verdict was that these efforts did not improve hospital outcomes or patient experience.

We are lucky we have a process in Oregon that allows Oregonians to weigh in on mergers within our medical system rather than allowing businesses to make these decisions independently. Care Oregon is doing a good job, it has solid financial resources to provide the care that Oregon residents need. Why fix something that is not broken? As an advocate for my OHP patients, please do not allow this merger to take place.

Thank you,

Lauri Hoagland, Family Nurse Practitioner

34. SCAN GROUP POTENTIAL MERGER

Received 11/16/23

In favor = I believe that it will nurture non-profit option in health care management to counter balance the for profit Medicare options in the marketplace. It appears that OHA retains opportunity & right to review & judge policies, impact and transparency of the operation.

Luke Groser (retired educator - age 81)
Portland

35. careoregon merger with scan group

Received 11/17/23

I for one do not want careoregon to merger with an out of state corporation. I have been helped a lot through careoregon and this kind of change would change the type of service careoregon provides for the worse. Why fix something that runs very well and serves the people of Oregon very well.

Please DO NOT go through with this merger!

Susan Irving

May you have peace throughout the year.

36. Scan Health Merger Feedback

Received 11/18/23

Hello,

I am a seasoned, educated administrator in the healthcare community - so much that I was a previous employee of Care Oregon in the Quality Improvement department. Aside from this, I have a degree in health policy and I've also worked with the Oregon Medicaid community as part of my work with Legacy Health's Care Management department, which services an extremely high Medicaid population as part of their payor mix, and whose department is responsible for dealing with Oregonians suffering the most. Currently, I serve as a consultant for improving value based care in rural communities.

There are many things wrong about the merger between Care Oregon and SCAN; health equity, corporate social responsibility, business ethics, and

From a health equity perspective, Care Oregon has an extremely small Medicare population, which is the primary membership of SCAN. Given this extremely small overlap, any touting of economies of scale in this merger is an attack on Care Oregon employees - those who not only contribute to the social well-being of members in our communities but also rely on careers at Care Oregon to fulfill their livelihood.

Those same people whose wages contribute not only to local economies, but to fund the very Medicaid system they service, an asset created by Oregonians starting with the formation of the Affordable Care Act (ACA), which is heavily based on the public healthcare system created by Oregonians and Governor Kitzhaber when the ACA started and Cover Oregon was created. From learning experiences, the Coordinated Care Organizational system was founded - the very system we use today, which Care Oregon is a structural part of.

From a financial perspective, Care Oregon is a tax exempt 501c3, defined as:

"religious, educational, charitable, scientific, literary, testing for public safety, fostering national or international amateur sports competition (as long as it doesn't provide athletic facilities or equipment), or the prevention of cruelty to children or animals."

With an operating profit revenue margin of over 4%, Care Oregon is an industry leader in profitability. This type of profitability directly goes against anything constituting a 501c3 and a stockpiled value of over \$1,000,000,000 (that's a billion - with a B) is value that has been swindled from taxpayers over the pandemic where utilization dropped to record lows and value-based programs continued to provide value payments when providers didn't have staff around and patients were staying home, staying safe. This created value has no business going to an organization whose CEO alone will receive more than 2% of the annual payment given.

I am very happy to see my former Care Oregon coworkers signing this petition, given the timestamps from after I encouraged staff to speak up about this given our below-inflation "raises" after we received a \$2,000 bonus the morning the acquisition was suddenly announced without Directors even having knowledge.

Care Oregon states that it's mission is

"to inspire and partner to create quality and equity in individual and community health. Our vision is healthy communities for all individuals, regardless of income or social factors."

Absolutely nothing good will come of this merger for our communities. So much so that the NIH has been sounding the alarm about the profit seeking behaviors of being associated with an MA plan who have the highest denial rates and highest profitability of **any type of plan in the history of managed care.**

Respectfully,

The guy they fired for talking about this and trying to blame it on racism instead of owning up to incompetency in management and not doing the right thing

37. CareOregon

Received 11/19/23

I am writing in opposition to the proposed merger of CareOregon, a CCO serving approximately 500,000 Oregon Medicaid patients, with California's SCAN Group.

There is no evidence that such corporate health care mergers improve access to care, quality of care, or savings of health care dollars - and those are the arguments which are being made in support of this proposed merger. In fact, I am concerned that such large scale corporate mergers will create a focus on profits (whether technically labeled as "reserves") over patients.

The increasing layers of corporate control in health care are concerning to me as an individual, as a retired clinician, and as an advocate for universal health care. It will be more difficult for OHA and for the public to retain accountability over OHP funds and access to health care if this merger goes through, creating yet another layer of confusing corporate bureaucracy.

I am concerned that the locus of decision-making about Oregon Medicaid dollars will no longer remain fully in our state. Oregon has a long history of effective innovations in health care policy and delivery, and more are in the works as this merger is being proposed. There is no good reason to further entangle CareOregon in a merger which will add an additional layer of bureaucracy between patient and provider.

Betsy L Zucker, MSN
Portland, OR

38. Written Testimony CareOregon Merger

Received 11/21/23

To Whom it May Concern,

My name is Taylor Ward and I have been on Oregon Medicaid (CareOregon) for several years now. Recently, my husband, an immigrant, also became eligible for Oregon Medicaid. I do not support the merger. I have lived in NH, FL, CA, and OR as a low income individual and unpaid caregiver for a disabled parent. In some states I was uninsured, and in other states I was underinsured (due to cost or eligibility). By far, the best health care I have received has been recently in Oregon, where I have needed several surgeries and specialist care as a Medicaid recipient. I do not want a merger to take place because I don't want the quality of care to go down for our most vulnerable Oregonians. History has shown that mergers tend to drop value and increase profits. That is why this merger is not in the best interest of Oregonians and my husband, Brett Anthony, and I do not support it.

Thank you for your time.

Regards,
Taylor Ward

39. Proposed merger of CareOregon into SCAN group

Received 11/23/23

It's very hard for me to see how this is going to help Oregonians currently subscribed to CareOregon plans. Generally, mergers dilute the power of existing stakeholders, and in this case, it would involve insuring two different populations, under different State laws. Selling insurance across state lines has typically, and in my opinion justifiably, viewed as a formula for a "race to the bottom" for insurance customers. I think the Legislature should require a public discussion of the merger and its presumed benefits; and this discussion period should be well-publicized so that it is not necessary to be an insurance or medical "wonk" to be aware that this is happening.

Loren Northrup

40. No Merger

Received 11/23/23

Hello,

Please do not create a bigger system with a potential merger of 2 systems.

Thank you for reading my comment of concern.

Carolyn Hinds
Oregon resident

41. DO NOT MERGE CARE OREGON with CA program SCAN

Received 11/25/23

YOU ARE SELLING OUT OUR OREGON CITIZENS.

I'm a Psychiatric Nurse Practitioner that has practiced in Oregon for 40 years. When OHA was initiated the inclusion of citizens and accountability was revolutionary in the health care system. Do not merge with Scan, California based health system. We will lose our control, and receive decreased quality of care. As studies show, bigger is not better, in fact the patient care declines.

If you want to decrease costs, check with your providers. We can help the OHA find ways to decrease costs without damaging patients.

Who is pushing this merger. Who will make more \$. The health care system is dying, because the private health insurance companies refuse care and put their greed over human lives.. Do not be deceived. You will be harming the most vulnerable people of Oregon. Further you will prevent accountability for the taxpayers of Oregonians.

BIG MISTAKE

Gretchen Randolph, Ph.D., PMNHP
Psychiatric Mental Health Practitioner.

42. Care Oregon Merger

Received 11/26/23

If CARE Oregon is merged it should only happen if low-income recipients can be assured the same or better access to care. Also, I am concerned that SCAN may enable discriminatory practices such as using the QALY criteria.

QALY violates both the Rehabilitation Act and the Americans with Disabilities Act. These types of scores have no place influencing what conditions and treatments the Oregon Health Plan will cover. QALY has to go to go!

Kim McCarty

43. Re proposed CareOregon merger

Received 11/26/23

I receive managed care through CareOregon and I oppose the proposed merger with Scan Group. History shows that big mergers in health care usually increase costs while harming the quality of patient care. This would be the first CCO merger of this

scale, but large mergers of Managed Care Organizations (MCOs) have increased costs without improving care, and large hospital system mergers usually result in worse quality of care and higher costs. This is backed up by evidence, as show in a well-known Harvard Study (<https://hms.harvard.edu/news/hospital-mergers-quality-care>).

I think moving the management and billions of dollars out of state is too risky. It will reduce accountability and increase complexity, and could make it harder for me and 500,000 Oregonians to get medical care. And as a person with complex care needs I can confidently say, it's already way too hard.

Please deny this proposal and help those of us reliant on spend more time living and less time fighting for access to health care.

Thank you,
Christoph "Nico" Serra

44. Comments on CareOregon/Scan merger

Received 11/30/23

Hello,

I am writing to express my concern about the upcoming merger between CareOregon and SCAN Group.

I am a mental health counselor in private practice, and the majority of my clients are covered by OHP with their benefits assigned to CareOregon. CareOregon is an organization I interact with directly, and with which I have extensive firsthand experience navigating prior authorizations, coordination services, referrals, and billing. I am also a former patient advocate and healthcare navigator, spending the first several years of my career coordinating patient needs with hospital, health plan, and provider office resources, and assisting patients in communicating with these entities.

In my experience, the bigger and further away from care delivery a payer or management organization is, the greater likelihood of vulnerable clients falling through the cracks. While this may look like dropped calls, extended times to authorize services, or added paperwork, a downstream effect is increased likelihood of crisis, missed preventive services, and greater need for expensive, traumatic intervention. This serves no one, and saves no money.

I can offer an example to illustrate my concern. I have a client who, at the time of initiating services with me, was under 21. I made an appropriate diagnosis that was listed "below the line" on OHA's list of prioritized health services. However, because the client was under 21 at the time of diagnosis, an exception could be made per OHA rules. I asked for CareOregon to make this exception. But, because CareOregon at the time contracted with PHTech to manage authorizations and claims, the process of actually authorizing and paying claims for this client took months. PHTech created miscommunication and delayed payment, something that I accepted as part of the risk of working with OHP as a provider, but many providers would not have accepted this risk.

While I understand the distinction between a third party subcontractor and a parent company, my concern about adding administrative layers to care delivery stands. I do not believe that greater efficiencies will be created in merging CareOregon with SCAN. Rather, I fear that delays, miscommunications, and, ultimately, worse outcomes for clients and providers.

Adding layers does not add efficiency. Outsourcing administration does not improve it. Please reconsider this merger.

Regards,
Isabel McCune

45. Stop the merger

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I cannot stress enough what a BAD IDEA the merger between SCAN Group (it should be called SCAM Group) and CareOregon.

The needs of the two states are completely different and the likely mismanagement of SCAN in California will only end up hurting Oregonians.

When I hear of potential mergers like this, there is only ONE question to ask: Who benefits? And by that I do not mean patients, because our for-profit healthcare system always costs patients and rewards insurance companies, pharma companies and hospitals.

So, NO, this merger is NOT a good idea.

Tracy Thompson