Health Care Market Oversight

Public Comments 005 Amazon-One Medical

This document includes written public comments related to transaction 005 Amazon-One Medical. OHA held a public comment period from November 29 to December 14, 2022 and received 36 written public comments via email at hcmo.info@oha.oregon.gov. This document presents the comments as received and may include typos or misspellings. Personal contact information for individuals has been removed. Additional comments are posted to the HCMO website.

You can get this document in other languages, large print, braille or a format you prefer free of charge. Contact us by email at https://document.ncb/hcmo.info@oha.oregon.gov or by phone at 503-385-5948. We accept all relay calls.

Public Comments

► Subject: Comment on the Amazon business opportunity Received 12/6/22

To: the Oregon Health Authority

From: Roberta (Bobbi) Hall, member and former chair of the Mid-Valley Health Care Advocates' Legislative Committee

Oregon is on the cusp of a momentous decision: to enact a universal single-payer health care system. Our Mid-Valley Legislative Committee has followed the board assigned by the Oregon Legislative Assembly, in 2019, to develop the structure for a single-payer type of universal health care system. We have followed what the board has considered and what they have developed carefully through their meetings, which culminated with a report in late September, 2022. Their next step will be to develop a Governance Board in the next (2023) legislative session. This has our support.

To the point of considering whether Amazon could do the merger it has suggested. This would — rather than develop a community based support that is publicly funded — further entrench our health care practices in a private system run by a business with questionable ethics. Health care is not a 'business' that can be privatized without harm; it is a service to the community, one that has been shown by developments in many other countries around the world to be effectively managed by a publicly-based entity.

Therefore, I do not support the OHA or any other state-based entity that wishes to privatize health care further. I believe the proposal by Amazon would do just that. Rather, I would support Oregon to look to the future and continue to support its own universal single-payer health care plan. Oregon can and should point the way to a better future.

Thank you.



► Subject: Feedback on Amazon--(merger and acquisition) Received 12/6/22

Feedback on Amazon entering healthcare in Oregon:

As part of the group that proposed, and then worked for passage of HB 2362, I certainly didn't have the foresight to imagine AMAZON "taking over" healthcare in Oregon. I had much more modest concerns—the current, mostly non-profit Oregon healthcare providers would continue to merge/acquire each other and thereby contribute to more inequality and less access to reproductive care in more and more communities. As Catholic affiliated hospitals and clinics buy up smaller, rural hospitals and providers and then deny lawful reproductive care to residents of these remote communities, and necessitate expensive and time consuming travel to distant cities offering the necessary care.

Having private equity firms like Amazon, never entered may mind! I am appalled to think that our already "broken" overpriced, INEQUITABLE healthcare delivery system could become even worse! Please use this law to its greatest extent to keep Amazon OUT of Oregon Healthcare!

Our first priority in Oregon is HEALTH EQUITY—not PRIVATE equity!

Mary Lou Hennrich

Subject: re Amazon clinics

Received 12/6/22

I am writing to you as a concerned community member, retired nurse and military veteran to say that this is just another example of the for profit industry whose first priority is to make money for share holders. We cannot allow making money be the first priority. The first priority must be health equity not private equity. thanks,

judith lienhard, portland oregon,

► Subject: 005 Amazon-One Medical

Received 12/6/22

I am writing to voice my opposition to 005 Amazon-One Medical.

Amazon is a company solely concerned with profit. This effort is just another example of the for profit industry whose first priority is to make money for share holders. Let's not allow making money be the first priority. The first priority must be health equity not private equity."

Additionally, Amazon subjects many of its employees to unreasonable and harsh working conditions. Allowing them to operate in Oregon would be a stain on the efforts to provide healthy and safe working conditions to everyone in the state.

Thank you for listening to my concerns.

Franco Ortega (he/him)

Subject: No Amazon takeover of health care!

Received 12/7/22

Dear folks in OHA,

I had hoped that passage of HB2362 would help make healthcare more equitable and affordable for everyone in Oregon.

To learn that Amazon is planning to take over five One Medical clinics in Oregon is very distressing; that can't help make healthcare more affordable. It is the very presence of for-profit organizations like Amazon, private insurers, profit-driven hospitals and physicians, pharmacies, middle-men, etc. that is making US healthcare inefficient and costly. We need to get the profit-driven system OUT of healthcare and put it in government hands where it belongs--for the benefit of ALL people, not corporate capitalists.

--

June Forsyth Kenagy

Subject: No to Amazon!

Received 12/7/22

To the Oregon Health Authority:

I am writing to strongly express my opposition to Amazon expanding its health care business in Oregon.

Amazon is about making profits for its shareholders, not about caring for the health of individuals or communities.

Please do not authorize Amazon to proceed. We need health equity in our state, not more private equity for Amazon!

Thank you,

Carol Raphael

Portland, OR

Subject: Don't let Amazon in!

Received 12/7/22

Health care should be offered as a Service NOT a profit center of private enterprise.

► Subject: Amazon purchase of One Health

Received 12/7/22

There are many reasons to be concerned about Amazon's purchase of One Health. They include 1) A long history of abusive working conditions which have been documented extensively 2) a long history of anti-competitive practices 3) accusations of lying to Congress that have been referred to the DOJ 4) a history of abusing its access to confidential business information and 5) its ownership of a pharmacy service presents a potential conflict of interest that raises further concerns about

anticompetitive practice. Several of these issues are detailed further in letter to the FTC from Senator Klobuchar, chair of the Senate Subcommittee on Competition Policy, Antitrust, and Consumer Rights, the link to which is here and which is pasted below https://www.klobuchar.senate.gov/public/cache/files/5/7/5772ebea-6944-4f96-b690-f67424b33bee/8EDFFC4CCF61183B835019EFDCBB6642.letter-to-ftc-dated-july-212022.pdf

The repeated assurances in Amazon's application about what its intentions are should not reassure anyone, given its track record.

Thanks, Rick Staggenborg, MD Physicians for a National Health Program, Oregon chapter Chair, Health Care for All Oregon Linn County

► Subject: Amazon buy-in Received 12/8/22

Dear Sirs,

I am strongly opposed to any involvement by Amazon in the Oregon heatth care system. They are a company rightly criticized for their emphasis on profiteering over worker rights and working conditions. I do not believe that making money should be the primary goal of any health care enterprise. Accessibility and quality of care should be paramount, best reached by single payer health care. We are long past due in providing the quality of care at reasonable cost enjoyed by other developed nations.

Sincerely,

Rachel Jordan

► Subject: fAmazon Acquisition of 1Medical offices

Received 12/9/22

Hi

I am a retired Nurse Practitioner who worked for 10 years at La Clinica in Medford. Most of my patients had complicated medical conditions which required an ongoing relationship with a health care provider to diagnose and treat their health care issues. Amazon is not equipped to provide the personal care needed for patients. Mergers and acquisition of companies focuses on consolidation, efficiency and profit to address the needs of shareholders. Amazon can deliver products to people but care is a much more complicated entity. Please do not allow Amazon to acquire 1 Medical offices in Oregon. It will not improve care to patients.

Sincerely,

Lauri Hoagland FNP

► Subject: Amazon plan for medical clinic in Oregon Received 12/9/22

As a resident of Oregon, I oppose any attempt by Amazon to establish private clinics in Oregon

Subject: Amazon "health care"

Received 12/12/22

We do not want Amazon "health care" in Oregon. Please say NO to yet another organization trying to make money from sick Oregonians. Pay attention to the fact that Measure 111 passed. Pay attention to the report of the legislative Task Force. We want safe, secure, publicly funded Health Care for ALL Oregonians.

Jo Alexander

Corvallis

Subject: Re: Re Amazon

Received 12/12/22

Please do not allow Amazon to buy up healthcare organizations like 1Life Healthcare. This gobbling up by corporations that have so much money they don't know what to do with it has to be stopped.

Thank you.

Cheryl Stevenson

Subject: Proposed Amazon purchase of One Medical

Received 12/12/22

I write to object to allowing a corporate behemoth like Amazon to turbocharge the takeover of health care facilities and administration in our state. Profit-based companies such as Amazon have shown no ability to increase access, affordability, and quality of health care in Oregon or anywhere else, let alone a company whose very existence is based on milking the last dollar out of both customers and providers. Health care is not a commodity, but it will be treated as such by Amazon. I urge you to deny their application.

Thank you.

Alex Polikoff

Subject: AMAZON?!

Received 12/12/22

Dear OHA

This application runs contrary to DO NO HARM......

Medicine for profit is ok but not if it's done with callous disregard for health vs the almighty dollar. This is only a first step. Don't let the camel get his nose under the tent.

Please turn down the bean counters at AMAZON. They are not in health care for a damned good reason.

John Watson MD

Subject: No to Amazon acquisition

Received 12/12/22

AMAZON has applied to the Oregon Health Authority for approval of its acquisition of 1Life Healthcare and its subsidiary, One Medical, which includes five offices in Portland affiliated with Providence Health and Services

This is just another example of the for profit industry whose first priority is to make money for the shareholders. Let's not allow making money be the first priority. The first priority must be health equity, not private equity.

To the point of considering whether Amazon should be allowed to proceed with the acquisition it has suggested. This would — rather than develop a community based support that is publicly funded — further entrench our health care practices in a private system run by a business with questionable ethics. Health care is not a 'business' that can be privatized without harm; it is a service to the community, one that has been shown by developments in many other countries around the world to be effectively managed by a publicly-based entity.

Therefore, I do not support the OHA or any other state-based entity that wishes to privatize health care further. I believe the proposal by Amazon would do just that. Rather, I would support Oregon to look to the future and continue to support its own universal single-payer health care plan. Oregon can and should point the way to a better future.

► Subject: People before profit

Received 12/12/22

Dear Policymakers,

Who knows how much Amazon is pressuring you all at OHA to let them scalp Medicaid and Medicare through their sham "health care" services.

There is no way that Amazon is in it for the philanthropy nor for the egalitarianism of meeting health care needs.

Amazon is only concerned about increasing the bottom line for Bezos.

Not satisfied with being the richest person ever in recorded history, Bezos and his minions have put health care in their cross hairs for exploitation, abuse and racketeering.

It isn't bad enough that we do not have universal health care and pay extreme amounts of money for less than admirable outcomes. Now we are expected to go along with letting this greed machine called Amazon take over our access to effective, affordable health care.

Our so called health care system is a "disease-for-profit" system which needs to stop...now!

If you go through with this Amazon scam, the people of Oregon will rise up and protest this new phase of capitalistic exploitation.

JUST SAY "NO" to Amazon!

Catherine Stearns

► Subject: Amazon Acquisition/Merger Application Received 12/12/22

I would like to register my opposition to the application by Amazon for its acquisition of 1Life Healthcare and its subsidiary One Medical. Amazon is a profit centered mega corporation that is doing nothing but seeking to profit from health care. The first priority of any corporation is to make money for shareholders. Our healthcare, even the data and records part of it should not be a profit center for private industry. The application filed by Amazon gives assurances of compliance with the statutory criteria but does not in any way back up these assertions. Please reject this merger and acquisition.

Karen Christianson

Corvallis

► Subject: Amazon attempt to get into Healthcare business *Received 12/12/22**

Amazon attempt to invade Health Care as a business.

Amazon must not be allowed to enter the health care ownership. There is only one priority for Amazon and that is make a billion bucks on the healthcare backs of unsuspecting citizens. If they claim they are interested in health care for all, get on the bandwagon for healthcare for all.

They can back Healthcare for All Oregon and for the country as a whole. We need healthcare at the medicare level at least for all citizens - Free and secure and no exceptions..

► Subject: Amazon purchase

Received 12/12/22

I am a resident of Oregon. I feel strongly that Amazon should not be allowed to purchase this medical business. In America corporations are getting way too big. It's part of the cause that most Americans are getting poorer. We really need good management. Not corporate greed. Please do not let this transaction go through. Thank You, J Hudgens.

► Subject: Amazon and health care

Received 12/12/22

Gentlepeople:

I have recently discovered that Amazon has applied to acquire 1Life Healthcare and its subsidiary, One Medical. As an activist working toward publicly funded health care for all Oregonians, I am opposed to any action taking us in the opposite direction of privatizing our health care system. I'm happy to order medical equipment or even OTC meds on Amazon but I would not want a huge profit-oriented business to control my physical and mental health care.

I do not support the OHA or any other state-based entity considering privatization of health care, which I believe the proposal by Amazon represents. Oregon needs to look to the future and continue to support its commitment to universal single-payer health care. Voters spoke to this in November and Oregon should honor this vote and lead the way to a better future of health care for all.

Thank you,

Laurie Labbitt Perry

► Subject: Stand Against the Taking by Amazon Received 12/12/22

Don't let Oregon healthcare be Amazonized.

If Amazon, 1Life and One Medical and shareholders were a success, as the corporations and shareholders would define it, their success would be at the expense of employees, providers and patients. That is the track record we know.

From Amazon's words, it "expects" to retain employees and contractors. But at what cost to the employees and contractors? Amazon "does not intend" to restrict or otherwise reduce the scope of professional medical services and Amazon has no "intention" of limiting any patient's treatment of choice. Here there is no certainty.

Stand For Health Equity.

Thank you.

Carol Scherer

Oregon Resident and Voter

Subject: Amazon Received 12/13/22

I am concerned about the incursion of Amazon into Oregon's health care system, with the recently proposed purchase of clinics. The last thing we need in Oregon is private equity moving into the ownership of more health care institutions.

Please use whatever mechanisms are available with the legislation to review mergers and consolidations to block this purchase.

Betsy Zucker, MSN

Nurse Practitioner (retired)

Portland, Oregon

► Subject: Stop Amazon from buying into One Medical in Oregon Received 12/13/22

To Whom it May Concern,

Please REJECT Amazon's purchase of One Medical in Oregon. Amazon has a dismal labor and human rights record and a private corporation has no place in Oregon's health care. Please do all you can to block Amazon from encroaching into Oregon.

Sincerely,

Rachel Levy

► Subject: Opposed to Amazon purchase

Received 12/13/22

I am opposed to any purchases of medical businesses in the state of Oregon. Amazon is the business of profit as opposed to taking care of patients.

Thank you,

Jacquie Keller

► Subject: Amazon acquisition application

Received 12/13/22

Should Amazon acquire 1Life Healthcare and its subsidiary, One Medical?

NO

This will further entrench our health care practices in a private system.

Health care is not a 'business' that can be privatized without harm; it is a service to the community, one that has been shown by developments in many other countries around the world to be effectively managed by a publicly-based entity.

Therefore, I do not support the OHA or any other state-based entity that wishes to privatize health care further.

I believe the proposal by Amazon would do just that.

Rather, I would support Oregon to look to the future and continue to support its own universal single-payer health care plan.

Oregon can and should point the way to a better future.

Thank you,

Cheryl Lohman

Corvallis, OR

► Subject: Amazon's involvement in Oregon Healthcare Received 12/13/22

Oregon Health Authority:

I am opposed to allowing Amazon to proceed with the acquisition it has suggested. This would — rather than develop a community based support that is publicly funded — further entrench our health care practices in a private system run by a business with questionable ethics. Health care is not a 'business' that can be privatized without harm; it is a service to the community, one that has been shown by developments in many other countries around the world to be effectively managed by a publicly-based entity.

Therefore, I do not support the OHA or any other state-based entity that wishes to privatize health care further. I believe the proposal by Amazon would do just that. Rather, I would support Oregon to look to the future and continue to support its own universal single-payer health care plan. Oregon can and should point the way to a better future.

Thank you for your consideration.

Sincerely,

Susan Aronson

► Subject: Amazon purchase of Health clinics Received 12/14/22

I am opposed to Amazon's involvement in healthcare.

As Registered Nurse of 49 years I have seen how much damage, heartache, and poor health outcomes can occur when care is determined by profit motives instead of improved health.

I request that you work to prevent Amazon from its quest for more profit.

Sincerely,

Mary Ann Thomas RN BSN

► Subject: Input on One Medical / Amazon Merger Received 12/14/22

PUBLIC COMMENT ON ONE MEDICAL / AMAZON MERGER APPLICATION

Warren George 12/14/22

As a member of the Joint Task Force on Universal Health Care I have a specific interest in the evaluation of the One Medical / Amazon merger application.

First, I believe that the objections based on "for-profit" entities are misplaced since the merger will not have any effect on the existence or absence of for-profit medical entities in Oregon, and because the task force actuarial studies showed that profit in health care delivery is a small part of the cost of health care and is not a significant factor in the rise of health care cost.

What the task force did find is that the major savings of a single payer system would come from elimination of the complex and expensive arbitrage gamesmanship of tiered pricing and multiple risk pools.

Based on the actuarial analysis for Oregon, Medicare pays about 81% of the cost of services provided, Medicaid 69%, and private insurance (non-Medicare age) 137%. Even though the reimbursement rates are far different, it all works out to a fair reimbursement rate as long as providers serve all three types of patients in proportion to their share of the Oregon Market. The proposed Oregon single payer plan is based on this average aggregate payment such that providers who see an average mix of patients will see no change in net income once reimbursement rates are unified at one fair rate. Of course, providers who currently have been seeing only Medicaid patients should see an increase in income in the transition to a single payer system while those seeing only private insurance payments could logically expect a reduction in income.

With reimbursement rates are so wide, total reimbursement rates are extremely sensitive to patient mix. Even a small percentage reduction in the number of Medicaid patients, combined with an increase in the percentage of private insurance patients could double or triple the net operating margin for a particular clinic, but this would be accomplished by leaving other clinics to pick up the extra load of Medicaid patients, or leave those patients without care.

For the sake of fairness between providers, and for a smooth transition to universal care without winners or loser to fight the process, OHA should look at the aspect of ensuring that all providers, regardless of their ownership or business model should accept the full range of patients and patient reimbursement levels. One way to ensure that provider groups such as One Medical / Amazon serve all customers adequately is to propose that any provider who does not meet the quota for serving Medicaid and Medicare patients must pay the differential cost into the state Medicaid fund, to help others provide that care. OHA should investigate placing such a stipulation on the One Medical / Amazon merger.

► Subject: Public Comment: Amazon's purchase of OneMedical Received 12/14/22

To the point of considering whether Amazon should be allowed to proceed with the acquisition it has suggested. This would — rather than develop a community based support that is publicly funded — further entrench our health care practices in a private system run by a business with questionable ethics. Health care is not a 'business' that can be privatized without harm; it is a service to the community, one that has been shown by developments in many other countries around the world to be effectively managed by a publicly-based entity.

Therefore, I do not support the OHA or any other state-based entity that wishes to privatize health care further. I believe the proposal by Amazon would do just that. Rather, I would support Oregon to look to the future and continue to support its own universal single-payer health care plan. Oregon can and should point the way to a better future.

Thank You,

Fritz Stephens-Tiley, CHFP

Subject: 005 Amazon-One Medical Received 12/14/22

I oppose the Amazon and One Medical business deal. The proposed merger/acquisition of One Medical by Amazon should not be allowed to proceed, because it will harm Oregonians. The proposal is another example of consolidation of for-profit health care services that drive up costs to the consumers for the benefit of share holders and executives. The parties proposing this deal claim it will reduce costs, but those reductions will go to share holders and executives, not the people in need of care. Amazon does not care about providing quality health care; its only priority is profit. Providing health care should not be about creating profit. Health care services should be focused on patients' welfare. Please do not approve this deal.

Jennifer Sprague

➤ Subject: Public Comment on Amazon/OneMedical Transaction Received 12/14/22

Subject: Public Comment on Proposed Transaction Between Amazon and OneMedical

To: Oregon Health Care Market Oversight Program, Oregon Health Authority

From: Service Employees International Union Local 49

Date: December 14, 2022

SEIU Local 49 is a labor union representing 15,000 workers in Oregon and Southwest Washington, many of whom work in hospitals and healthcare clinics. We would like to express concern about Amazon's proposal to acquire OneMedical. While national groups have raised important matters that could be impacted should the deal proceed, such as market competition and consumer data privacy, we would like to highlight one main area of concern: labor issues and their potential impacts on patient care.

Amazon has been repeatedly accused of exploiting workers in multiple parts of its enterprise – from <u>corporate offices</u> to fulfillment warehouses to delivery vehicles – in the pursuit of greater profits. For example:

- Amazon's warehouse workers have reported long hours, timed bathroom breaks, intensive surveillance, physically grueling quotas, and other difficult working conditions – even leading <u>hundreds of public health experts to implore the company to make changes</u>. In fact, last year *The Washington Post* conducted an independent analysis of OHSA data and found that <u>Amazon warehouse workers suffer serious injury at rates that are nearly double</u> those at warehouses run by other companies.
- The company has also been widely criticized for its treatment of delivery drivers, and was fined \$62 million by the Federal Trade Commission to settle charges that it withheld tips over two-and-a-half years: Missing wages, grueling shifts, and bottles of urine: The disturbing accounts of Amazon delivery drivers may reveal the true human cost of 'free' shipping" | Business Insider.
- Amazon's commitment to prioritizing worker safety over operational efficiency was called
 into question earlier this year when the <u>House Oversight Committee launched an</u>
 investigation into Amazon's role in the collapse of an Illinois warehouse that killed six

- workers. Employees alleged that they did not seek shelter during a deadly tornado because they feared retaliation from their employer.
- Amazon also has a history of complaints for <u>delaying and denying disability</u>
 <u>accommodations</u>—including lighter duty for pregnant warehouse workers. Last fall, <u>The</u>
 <u>New York Times published the results of an in-depth investigation that found</u>, "For at least a
 year and a half—including during periods of record profit—Amazon had been shortchanging
 new parents, patients dealing with medical crises and other vulnerable workers on leave."

What's more, Amazon has a well-documented history of interfering with workers' rights to form a union. For example, the NLRB ruled that Amazon violated the National Labor Relations Act in two recent union organizing drives in Staten Island, New <u>York</u> and Bessemer, Alabama. Unions can provide a path to improve working conditions and prevent or resolve the problems described above.

Troublingly, One Medical appears to have its own track record of putting revenue maximization before the well-being of employees—and potentially over the health of patients. In 2021, NPR spoke to 10 current and 3 former One Medical employees and found that, "employees point[ed] to several changes in company policies that, they say, place profits over patients, including requirements for shorter doctor visits, less time to respond to patient concerns at the company call center and rushed schedules for laboratory employees."

The employees alleged that the company fundamentally changed after its initial public stock offering in January 2020. "The minute we went IPO, we pivoted away from patient care to membership volume," said one administrative staffer at One Medical quoted in the NPR investigation. "It's about membership numbers and showing the investors our membership numbers have gone up."

With patient care concerns already alleged by staff at OneMedical, when combined with Amazon's focus on profits, we are concerned this trend may worsen and ultimately impact the care received by the residents of our state.

For these reasons, and those raised by national and state consumer advocacy groups, we urge the Oregon Health Authority to carefully examine the track records of each entity when considering whether to approve this transaction. If the deal is to move forward, we believe the Authority should explore imposing strict conditions to safeguard Oregon workers and patients.

► Subject: Amazon Health Proposal Received 12/14/22

Dear Reviewers.

Under absolutely NO CIRCUMSTANCES accept, approve or even consider the 005 Amazon-One Medical proposal. I have relatives who work for this evil entity, and the only thing they care about is profit. Their employees are treated as disposable assets, not human beings. Health must be the the priority of health care, NOT profit. Oregon citizens deserve better!

► Subject: Reject Amazon for One Medical for Oregon Received 12/14/22

Dear OHA,

Please reject Amazon's buying into One Medical in Oregon.

Thank you, Liz Adams (97213)

About HCMO

The Health Care Market Oversight program reviews proposed heath 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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