

Dear Community Review Board members,

A review of public comments to date (see table below) indicates an **opposition to this transaction of 4:1**. The spread is even larger if you consider those who are asking the CRB to proceed with caution or require more detailed answers from OHSU on how they will address the lack of access and health equity. Upon further analysis, you will find the majority of those supporting this merger are individuals and leaders of entities that directly benefit from the two systems coming together. The support for OHSU's acquisition of Legacy Health, particularly from Labor Partners and OHSU leadership, deserves careful scrutiny. These groups stand to directly benefit from the acquisition, which calls into question whether their endorsement is rooted in a genuine concern for the well-being of patients and the community or whether it's driven by personal or organizational gain.

OHSU Leadership: The leadership of OHSU is advocating for the acquisition as a way to increase the institution's market share and expand its resources. The acquisition would consolidate OHSU's position in the region, giving it greater control over healthcare delivery, greater insurance contracting leverage and a larger pool of patients. While the leadership claims this will enhance the quality of care, the reality is such acquisitions often result in higher administrative costs, reduced competition, and less focus on patient-centered care. If OHSU was certain of its ability to deliver on improved performance they would use their integration with Adventist and Tuality as examples. Their failed integration with Salem Health likely shows a more accurate picture. The primary goal here seems to be positioning OHSU as the dominant healthcare provider in the region, not necessarily improving care for patients in Oregon.

Labor Partners: The Labor Partners as [outlined in the Letter of Agreement they signed with OHSU](#) include: AFSCME, ONA, OFNHP, SEIU Local 49, and PNWHMA. The Labor Partners also have a vested interest in the acquisition. The Labor Partners may argue that consolidating healthcare institutions leads to better opportunities for their members through increased bargaining power, larger pools of employees, and potentially more favorable contracts. However, this perspective overlooks the long-term risks to healthcare quality and patient care. If the acquisition leads to higher operational costs, cuts in services, and/or a more centralized and bureaucratic healthcare model, it could ultimately harm workers as well as patients. The concern here is that unions, while advocating for their members' immediate needs, may be creating broader, long-term consequences for the community at large. After going through a challenging negotiation with Providence which marred both groups' reputations, the Labor Partners may see an advantage that there is no way OHSU could withstand the state or community backlash to not accept the Labor Partners' demands.

The Labor Partners have written many letters in support of this acquisition reinforcing what a great partner OHSU is, and yet less than a year ago, they were [protesting during a public OHSU board meeting](#) because OHSU had not been transparent. What has really changed except for a new interim president?

Why the Opposition Should Carry More Weight: Comments opposing the acquisition, particularly from patients, [health care law and policy scholars](#), [other unions](#), healthcare employees and [public health advocates](#), are grounded in concerns that are not driven by personal or organizational self-interest but by the broader impact on the community. Patients worry about rising healthcare costs, reduced access to care, and the potential for monopolistic practices that could harm their ability to receive timely and affordable treatment. Public health advocates and health care scholars are cautioning that such acquisitions often lead to higher prices, reduced service options, and inefficiencies that harm the public. These concerns should be given more weight because they are based on evidence and focus on the well-being of the wider community, not specific institutional interests.

Labor Partners and OHSU leadership may see the acquisition as a win for their own interests. In contrast, the concerns raised by patients and experts reflect a more comprehensive understanding of the potential risks and negative consequences of such an acquisition. The voices of those directly impacted—patients and the broader community—should be given more consideration when evaluating the merits of the acquisition.

Rough count of comments below (a few repeat commenters) includes all standalone letters, comments prior to public comment period opening and running list of comments since October 2024. Comments are only attributed to patients if stated they were either an OHSU or Legacy patient. It should be noted that all community members are healthcare patients, but unknown if current Legacy or OHSU patient.

Commenters	Opposed	In Favor	Cautionary	Foundation Related
Patients	43	8		10
Employees	13	3		
Union Employees		21		
Community Members	158	7	29	
Community Organizations	4	8		
Union Leadership		3		
OHSU Executives		4		
Total	218	54	29	10
Primate Ctr. Conditional				
3,781				