

EXECUTIVE SUMMARY

039 OHSU-Legacy Preliminary Review

The [Health Care Market Oversight](#) (HCMO) program reviews proposed health care business deals to make sure they support Oregon's goals of health equity, lower costs, increased access, and better care. After completing a review, the Oregon Health Authority (OHA) issues a decision about whether a business deal, or transaction, involving a health care company should proceed.

Proposed Transaction

On October 4, 2024, OHA accepted a complete [notice of material change transaction](#) ("notice") from Oregon Health & Science University ("OHSU"), detailing plans to buy Legacy Health ("Legacy") and fully integrate Legacy into the OHSU health system. OHSU states that the transaction will not decrease the level of services provided by either entity, and the transaction will expand both the type and level of health care services both OHSU and Legacy currently provide.

OHA's Review

OHA completed a 30-day preliminary review of the proposed transaction. During the review, OHA began to assess the potential impacts of the proposed transaction. OHA's preliminary analysis focused on assessing the scale and scope of the entities' operations and services in Oregon, how the transaction could affect consolidation and competition in Oregon's health care markets, and implications for access to services, health care costs, health equity and quality. OHA held a public comment period and received more than 120 [public comments](#).

Based on the information obtained during preliminary review, OHA determined that the proposed transaction requires a comprehensive review.

Next Steps

OHA will complete the comprehensive review within 180 days of when it accepted a completed notice unless the review period is tolled or extended in accordance with Oregon law. During the comprehensive review, OHA will analyze the likely impact of the transaction on access, cost, quality, and equity and determine whether the transaction meets the criteria for approval under Oregon Administrative Rule (OAR) 409-070-0060(6).

Upon completion of the comprehensive review, OHA will issue a proposed order to approve, approve with conditions, or disapprove the transaction.

OHA plans to convene a community review board for the comprehensive review of the proposed transaction. Community review boards provide input about transactions and make a recommendation to OHA about whether or not the transaction should be approved. Members can include people who live and work in affected communities, consumer advocates, health care experts, and health care providers.

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If you would like to participate in the community review board for this transaction, email hcmo.info@oha.oregon.gov. OHA staff will provide more information about the timeline, member requirements, and application process.

OHA will accept and post public comments throughout the comprehensive review period. Public comments can be submitted via email to hcmo.info@oha.oregon.gov, voicemail at 503-945-6161, or online [public comment form](#). Please mention "OHSU" in your comment.

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.