



OREGON ACADEMY OF  
FAMILY PHYSICIANS  
**MAKING HEALTH PRIMARY**

March 4, 2025

Members of the Community Review Board  
Oregon Health of Authority  
VIA EMAIL

Dear Committee Members,

On behalf of our more than 1,800 members of the Oregon Academy of Family Physicians (OAFP), we are pleased to offer these brief comments on the proposed merger of OHSU and Legacy Health.

We appreciate the extensive and careful comments submitted by other stakeholders as to the potential economic implications for the Portland metro area, and we urge careful consideration of those comments and the evidence those comments draw on.

The leaders of the OAFP feel it is essential to consider that the situation of the primary care system in the state, and by extension of the proposed service area of the merged resulting entity, is precarious. A 2022 survey showed that wait times for family medicine appointments for 15 major metropolitan areas in the US found the average wait for a new-patient visit was highest in Portland, at 44 days.<sup>1</sup> Our primary care workforce is aging at the same time that the population is aging and requiring additional care.

Meanwhile, a recent study found that across the country, prices for primary care services delivered by hospital systems were higher than services delivered by PCPs in independent practice.<sup>2</sup> The potential impacts on consumer costs as a result of consolidation have been amply demonstrated by other public comments.

What we would urge the Community Review Board and members of the HCMO to ask of the requestors is a detailed plan for how they will **expand** primary care access in the service area the merged entity would cover. To our knowledge, no such plan currently exists. Advanced

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<sup>1</sup> 2022 Survey of Physician Appointment Wait Times and Medicare and Medicaid Acceptance Rates, AMN Healthcare and Merritt Hawkins. <https://www.amnhealthcare.com/amn-insights/physician/whitepapers/survey-of-physician-appointment-wait-times/>. Accessed 1/29/25.

<sup>2</sup> Singh Y, Radhakrishnan N, Adler L, Whaley C. Growth of Private Equity and Hospital Consolidation in Primary Care and Price Implications. *JAMA Health Forum*. 2025;6(1):e244935. doi:10.1001/jamahealthforum.2024.4935 Accessed 1/29/25.



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primary care is the only part of health care that has demonstrated an improvement in health outcomes.<sup>3</sup>

Oregon has made a commitment to support the Patient-Centered Primary Care Home model, and the HCMO has an opportunity to require of these requestors that they demonstrate that they are dedicating enough infrastructure and support to that vital component of the system.

Additionally, OAFP and our sister organization, the Oregon Residency Collaborative Alliance for Family Medicine, have a responsibility to work to support and ensure a strong family medicine workforce. Given OHSU's role in educating medical students and family physician residents, we believe it is fair to require the parties to the merger to describe clearly how the new institution will support the institutional and community faculty who are training family physicians, and safeguard the regional capacity to do so.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Besty Boyd-Flynn".

Besty Boyd-Flynn  
Executive Director and CEO  
Oregon Academy of Family Physicians

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<sup>3</sup> Hiding in Plain Sight: Investing in Primary Care can Heal our Dysfunctional Health Care System. June 2024. [https://theppcc.org/issue\\_briefs/hiding-in-plain-sight-investing-in-primary-care-can-heal-our-dysfunctional-health-care-system/](https://theppcc.org/issue_briefs/hiding-in-plain-sight-investing-in-primary-care-can-heal-our-dysfunctional-health-care-system/). Accessed 2/7/25.