



March 13, 2025,

Oregon Health Authority  
Health Care Market Oversight (HCMO Program)  
Barbara Roberts Human Services Building  
500 Summer Street NE, E-65  
Salem, OR 97301  
Submitted via email to [hcmo.info@oha.oregon.gov](mailto:hcmo.info@oha.oregon.gov)

Dear HCMO Program Staff and Community Review Board,

As providers and as advocates for reproductive health care access and health equity who supported legislative adoption of the HCMO program in 2021, we write in strong support of OHSU's proposed acquisition of Legacy Health. One of the reasons Planned Parenthood Advocates of Oregon (PPAO) supported creation of the HCMO law in 2021 was to ensure that access to essential healthcare services, including reproductive health care, was preserved during any healthcare acquisition, merger, or affiliation. The OHSU-Legacy integration not only preserves critical access but expands it, making it a significant opportunity for the state in alignment with the expectations of the HCMO law.

Planned Parenthood Columbia Willamette (PPCW) and Planned Parenthood Southwestern Oregon (PPSO) provide a comprehensive range of reproductive and preventative health care services at locations throughout Oregon including the Portland metro area as well as Bend, Eugene, Grants Pass, Ontario, Medford, Salem and Vancouver, WA and through telehealth throughout the state. PPCW is the largest nonprofit provider of sexual and reproductive health care and sex education in Oregon and Southwest Washington, serving more than 74,000 patient visits annually. PPSO is dedicated to building a strong, healthy community by providing essential health services, education, and advocacy, serving close to 20,000 patients each year.

As safety-net providers, approximately 69% of our patients rely on government programs, like Medicaid, for their health care coverage. Every day we witness how challenging it can be for our patients, especially those on Medicaid, to access high-quality health care they need and deserve. We support the proposed merger with Legacy Health because OHSU has committed to improving access and services for some of the most vulnerable people in our communities.

Legacy and OHSU already provide critical healthcare to underserved populations. The vast majority—72%—of Legacy and OHSU's patients do not have commercial insurance and are on Medicaid, Medicare, self-insured, or need financial assistance. The OHSU-Legacy integration and OHSU's \$1 billion capital investment will help maintain and strengthen the reproductive and other health care services provided by Legacy today, improving access and reducing wait times.



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This is especially important for our underserved patients, who have the least flexibility and resources to contend with difficult scheduling or other delays in needed care.

In addition, we support the proposed integration because integrating will benefit the provider and workforce pipeline by strengthening the training opportunities OHSU already provides. The integrated health system will offer a larger range of clinical practice settings and more opportunities to improve collaboration and better serve patients. Planned Parenthood hosts many OHSU students, residents, and fellows in our health centers as part of their professional training. Increasing clinical practice settings will help grow local capacity for health care services.

Some healthcare mergers, acquisitions, and affiliations have resulted in the denial or delay of essential reproductive and LGBTQ+ care. OHSU's commitment to protecting and improving access to this critical kind care is all the more salient particularly in a post *Dobbs* landscape where access to reproductive health care is under threat more than ever. Furthermore, as private-equity firms rapidly expand their reach into the healthcare market, OHSU is the best option for acquiring Legacy. OHSU is a public entity subject to public records laws and Governor-appointed leadership. OHSU's core mission to improve the health and well-being of Oregonians is codified into state law. Unlike some venture capitalist firms beholden to their shareholders for maximum profit, OHSU is accountable to the public to deliver on their commitment for reduced wait times and improved access to care.

Please approve the proposed merger so the new OHSU can begin work to deliver on the commitments to improve care for people in Oregon, especially people who are underserved by the current health care system.

Sincerely,

A handwritten signature in black ink that reads "Sara Kennedy, MD".

Sara Kennedy, MD, MPH (she/her)  
President and CEO  
Planned Parenthood Columbia Willamette

A handwritten signature in black ink that appears to read "Amy Handler".

Amy Handler, MPH (she/her)  
President and CEO  
Planned Parenthood of Southwestern Oregon