

Public Comments

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. This document presents public comments related to the HCMO review of 078 Spring Health-Alma. OHA accepted public comments during the preliminary review period. Public comments were received via email to hcmo.info@oha.oregon.gov, voicemail, or by filling out the [Public Comment Form](#). Comments are presented below in the order received and may include typos or misspellings. Personal contact information for individuals has been removed.

OHA expresses no views on the substance of these comments, and their publication does not constitute an endorsement by OHA of the views expressed.

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1. 04/08/2026

This transaction poses a number of important issues relating to quality, safety, ethics, and business model enforcement in the context of AI-chatbot tools for mental health services.

<https://www.brown.edu/news/2025-10-21/ai-mental-health-ethics>

Spring Health creates and markets AI-powered mental health chatbots that are used as components of its Continuing Care Model. The use of chatbots by vulnerable patients of all ages is highly controversial and is the subject of an ongoing FDA-led clinical evaluation of digital medical devices for safety—including suicidality-- and efficacy.

<https://www.fda.gov/media/190450/download>

HCMO is being asked to approve the acquisition of Alma and the AI-chatbot before the FDA device study has been completed, safety and efficacy standards have been adopted, pre- and post-marketing enforcement methods have been developed, and the Spring Health chatbot has secured marketing approval.

Quite apart from FDA digital mental health chatbot standards—in progress-- HCMO, itself, has not adopted concrete and measurable criteria for assessing the health and safety risks of this new technological (large language model) tool. Nor does it have the specialized resources needed to do so: clinical, technical, risk-assessment, ethical.

Finally, market experience (the Woebot example) demonstrates that AI-chatbot applications are constantly in flux. Thus any given application that HCMO might conceivably approve is likely to change thereby posing a virtually insoluble problem for effective HCMO enforcement.

<https://telehealth.org/news/ai-psychotherapy-shutdown-what-woebots-exit-signals-for-clinicians/#:~:text=The%20Real%20Reasons%20Behind%20Woebot's,environment%20for%20AI%20psychotherapy%20tools:>

For these reasons, I believe the proposed Spring Health-Alma transaction--particularly the AI-Powered Chatbot component—cannot be adequately evaluated and enforced by HCMO for quality, safety, and ethical concerns. Nor have pending FDA marketing standards for mental health chatbots been adopted. As a consequence, HCMO really has no acceptable option but to deny the application without prejudice.

Larry Kirsch

About HCMO

The Healthcare Market Oversight Program reviews proposed health 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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