



December 13, 2022

TO: Oregon's Health Care Mergers Oversight Program  
FR: Maribeth Guarino, Oregon State Public Interest Research Group (OSPIRG)  
RE: Amazon purchase of OneMedical

OSPIRG is a consumer advocacy organization with members across the state. We stand up for lower health care costs and thank the oversight program for the opportunity to provide comments on the potential impact of the Amazon/OneMedical acquisition.

From our experience and the stories we've heard from Oregonians and members of our network across the country, OneMedical provides a good, consumer-friendly experience for primary care services. Access to primary care is vital to ensuring Oregonians can maintain their wellbeing and prevent or address medical issues before they become more severe. Amazon prides itself on the consumer experience, aiming to be "[Earth's Most Customer-Centric Company](#)", and that should include patients seen at Amazon-controlled facilities and organizations.

Though the filing for this transaction indicates that there is no expected change in health care services and that the transaction is an opportunity "to make quality care more affordable, accessible, and enjoyable," evidence shows that [consolidation leads to increased prices](#). Vertical consolidation, where large companies buy up smaller ones, are particularly concerning due to the potential anticompetitive effects of having fewer and more powerful players controlling the market. Though Amazon is not strictly a health care provider, it is a large conglomerate with a lot of money and influence. Having such a big player in the Oregon health care market is not necessarily a bad thing, but the state should conduct this review with care. During the preliminary review, the state must consider whether the transaction will raise the cost of care or reduce access to essential services. As previously stated, the primary care services provided by OneMedical are important to keeping Oregonians safe and healthy. If this transaction could put those services and the ability of consumers to get care without excessive costs at risk, then the state should put the transaction under further scrutiny and take advantage of the mechanisms like a community review board and comprehensive review in order to ensure this acquisition does not harm Oregonians.

Amazon is an international company, and so this transaction has implications beyond Oregon. Across the country, health care consolidation poses huge risks to consumers' access to care. Approving this transaction without further scrutiny could have serious ramifications in setting a precedent not only for Oregon's oversight program, but also for health care markets across the nation. As one of the strongest review programs for health care consolidation in the country, HCMO must take this review seriously, as the decision for this transaction may have ripple effects beyond the state borders. The HCMO is a good program that provides necessary transparency, accountability, and consumer-first attitudes towards health care. OHA should ensure that consumers are the first consideration in whether to approve this transaction.

We would also remind the reviewers that the program requires continued monitoring of transactions post-review, and regardless of the outcome of the review, the concerns noted here should merit vigilance over the effects of the transaction in the future. Continued monitoring will show any undue effects on cost, quality of care, or health outcomes that contradict the filing. In addition, it will also inform the program as to how to conduct future reviews, including what to look for and probable outcomes of transactions involving huge corporations. We urge your careful review of this transaction and that HCMO prioritizes the overall consumer experience in terms of real cost, access, and outcomes.