

Public Comments

018 Optum & The Corvallis Clinic

This document includes written public comments related to the review of transaction 018 Optum & The Corvallis Clinic by Oregon Health Authority (OHA) under the [Health Care Market Oversight](#) program. OHA received written public comment via email to hcmo.info@oha.oregon.gov. 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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Public Comments

1. Subject: CORVALLIS CLINIC MERGER

Received 12/31/23

I am Bruce Thomson, MD retired from private medical practice, and I am opposed to the current proposed merger of the Corvallis Clinic with Optum Oregon MSO. I am an advocate for the state of Oregon living up to the recent amendment of Oregon constitution, as voted on by the voters in Oregon in 2022, regarding access to affordable equitable health care for all in Oregon.

Increasingly we are seeing mergers of medical groups in western Oregon to out-of-state national corporations that have been approved by OHA/HCMO. As OHA and HCMO continue to approve these mergers, the health care aspirations as stated in the Oregon Constitution of assuring all Oregonians access to affordable health care are jeopardized. Medical mergers and acquisitions are the leading cause of escalating health care costs as stated (ref slides 5) during presentations to the Oregon Senate Health Care Committee Testimony of November 6, 2023;

<https://olis.oregonlegislature.gov/liz/202311/Downloads/CommitteeMeetingDocument/277682>



Health care consolidation is the “No. 1 driver of health care spending inflation,”

- David Dranove

Distinguished Professor at Northwestern University's Kellogg School of Management

and as reaffirmed by OHA's David Baden in his presentation on mergers and acquisitions to the Nov 6, 2023 Senate Health Care Committee (slide 6, 7) ;

<https://olis.oregonlegislature.gov/liz/202311/Downloads/CommitteeMeetingDocument/277646>

Consolidation can result in...

Higher prices

Consolidation can lead to higher prices for products & services, higher insurance premiums¹

No improvements to quality or outcomes

Consolidation may reduce quality of care in some cases, e.g., by increasing use of low-value procedures²

Changes to services

Consolidation can impact the type, location, and staffing of services, particularly in rural areas³

Potential impacts for people in Oregon



- Higher personal spending on health care
 - Forgoing care & medications
 - Medical debt
- Higher costs for employers slows wage growth
- Fewer choices for obtaining care
- Fewer options for health care employment
- Some communities or populations experience impacts more than others, potentially exacerbating health inequities

While OHA claims to seek to reduce health care costs for Oregonians, they will not succeed in this goal as they continue to approve mergers with national organizations designed specifically to maximize corporate “earnings” based on ratcheting-up healthcare costs to Oregonians. While OHA claims to seek equity in access to health care for Oregonians, they will not succeed with a strategy which approves mergers that will outprice many Oregonians.

I am opposed to this merger for other reasons as well. Optum Oregon MSO is owned by Optum Inc., which is owned by UnitedHealth Group Inc. In the past 6 months, two large hospital systems in Oregon have notified UnitedHealth Group that they are no longer accepting patients that have Medicare Advantage insurance through UnitedHealth Group. This represents a serious breach in the medical insurance net that impacts all Oregon seniors. It also speaks loudly of the dissatisfaction that these two large health systems have experienced in dealing with UnitedHealth Group. I am not aware of any public statements or any actions that OHA may have taken regarding this breach in insurance to Oregon seniors. If in fact there were no actions that OHA or HCMO could have taken in these two situations then most Oregonians are truly at the mercy of the national health care corporate infrastructure.

Optum Oregon MSO proposes to acquire The Corvallis Clinic. To say that The Corvallis Clinic is the largest multi-specialty medical group in the mid-Willamette Valley is a misstatement. OPTUM Oregon MSO already owns the largest multi-specialty group in western Oregon. With ownership of Portland and Eugene OMG and a number of other medical practices in the Willamette Valley; OPTUM is well on its way to become a major factor in determining health care costs in the Willamette Valley for the foreseeable future. Optum’s goal is to maximize their earnings based on the costs of health care to Oregonians.

During the purchase/merger of Eugene OMG by Optum Oregon MSO in 2022, my disabled son and I were desperately in need of him being evaluated for an evolving medical condition. Our desperation was based in the fact that ALL clinics (PCP and Specialty) of the OMG Eugene medical group were closed to patient appointments every afternoon for up to 4 months as the medical staff and providers were learning the proper use of the Optum medical information system for ordering tests, sending referrals, requesting authorizations, etc. That left my disabled son to need to go the local Peace Health ER on several occasions and otherwise led us to seek

alternative locations in the Willamette Valley for him to be evaluated. With the purchase of the Corvallis Clinic, I am concerned for a similar situation evolving for patients served by The Corvallis Clinic wherever they are in the mid-Willamette Valley. If the Corvallis Clinic closes every afternoon for 3-4 months then there is likely to be increased visits to local ERs. For people who cannot afford a visit to the ER that will be a difficult choice.

It is disingenuous for the state to give such a short window of comment, especially during the holiday season, for input from the people of Oregon about this proposed merger. It feels more like this is a done deal, an open and close case of allowing a financially rich national corporation to continue to set in motion the wheels for a future healthcare system that does not contribute to the ethical goals of affordability and equity in the delivery of health care in Oregon. A pause on the approval of mergers of medical groups with out-of-state corporations, especially given the likely outcome of increasing medical costs and inequitable access and the other potential impacts listed by David Baden for the people of Oregon, seems appropriate. This would allow time for OHA and the state of Oregon to re-evaluate if we truly want to live by the Oregon constitution by assuring equitable access to affordable health care. The alternative is that national corporations will set the rate of increase in costs of health care for the foreseeable future.

Bruce Thomson, MD retired

County Health Officer, retired

2. Subject: Optum - Corvallis Clinic Merger Review

Received 1/1/24

Good day,

I write in opposition to the proposed sale of Corvallis Clinic to Optum/United Health. As a Medicare-age resident of Corvallis and frequent user of local health care providers, I am very concerned that local access to equitable, affordable health care will be negatively impacted by control from a large out-of-state national corporation which has been demonstrated to be an unethical player in the Medicare market. Additionally, mergers and acquisitions have been shown to result in net increases in healthcare costs, despite corporate claims to the contrary.

Please reject this merger, and support local ownership of our healthcare providers with all the means at your disposal.

Thanks for your consideration,

Alex Polikoff

Corvallis, OR

3. Subject: Sale of Corvallis Clinic

Received 1/2/24

I oppose the sale of the Corvallis Clinic to a large conglomerate which will negate our recently amended constitution here in Oregon to provide affordable healthcare to all Oregonians.

The Corvallis Clinic works well for its patients, many of whom are Medicare and disabled patients as well as young mothers. The loss of our pharmacy at the clinic because it was taken over by a bigger pharmacy, was a blow to our older patients especially, and now you want to screw with our affordable, accessible healthcare providers. Cease and desist from these acts of trying to sabotage Oregon's affordable healthcare options.

Susan C Sheythe

Native Oregonian

4. Subject: Optum

Received 1/2/24

I am writing in firm opposition to the sale of the Corvallis Clinic to Optum and UnitedHealth.

The Corvallis Clinic was created specifically so that there would be a multi-faceted clinic, run by, and responsible to, medical practitioners. If this sale is allowed to go through, it is the end of that practice. I for one want my health care to come from health care professionals, not profit-seeking out-of-state corporations.

May I remind you that the voters of Oregon amended the state constitution in 2022 to assure access to affordable equitable health care for all. Approval of this sale would run counter to our vote. We are not going to achieve affordable equitable health care by selling the Clinic to UnitedHealth; acquisitions and mergers of this kind are a leading cause of rising health care costs.

I urge you to reject this sale.

Jo Alexander

Corvallis

5. Subject: Optum and Corvallis Clinic

Received 1/3/24

To whom it may concern,

I strongly oppose the proposed acquisition of Corvallis Clinic by Optum/United Health Care. The Corvallis Clinic has provided excellent care for many years. Its sale to a huge insurance company will surely result in higher costs and poorer, more impersonal service for patients.

In addition, this acquisition is a thinly disguised end-around of SB 2089 and Measure 111, which were voted into law by the people of Oregon.

Please do NOT let this deal proceed. It has nothing to do with affordable health care, and everything to do with corporate profiteering.

Sincerely,

Tim Hardin, Ph.D.

Corvallis OR

6. Subject: Oppose Proposed Optum Acquisition of Corvallis Clinic

Received 1/3/24

Please deny the acquisition of the Corvallis Clinic by Optum, a subsidiary of United Health Care. This acquisition is not in the interest of residents of Oregon.

We must not allow the largest health insurance company on earth to acquire a locally-owned and operated health care facility. This simply puts too much power over our local residents' health care needs in the hands of a single corporate entity based 2000 miles away in Minnesota.

Allowing this enormous profit-seeking corporation to monopolize our residents' health care from both the provider and the insurance side can do nothing but further jeopardize affordable health care.

This merger will defeat the purpose of SB 2089 and Measure 111 and the will of the people of Oregon.

Sincerely,

Marge Popp

Corvallis, OR

7. Subject: RE merger with Corvallis Clinic and United

Received 1/3/24

Dear OHA,

Please deny the merger of Corvallis Clinic to United. It is not in our interests.

We have to stop these mergers by corporate entities that make our costs go up, not down, as so often promised.

Thank you.

Cheryl Stevenson

Corvallis OR

8. Subject: Optum purchase of Corvallis Clinic

Received 1/3/24

We are opposed to the purchase of the Corvallis Clinic, Corvallis OR, by Optum Oregon MSO. The Corvallis Clinic was started by local practitioners and provides great quality care for patients. We do not support the purchase by a national company as it does not agree with the principles upon which the Clinic was founded. United Health Care has a very poor reputation for providing service and is more interested in making profits than providing patient care.

Consolidation of health care into a few national companies is not in the best interest of providing service to local communities.

Tony and Sandi Olsen

9. Subject: Sale of The Corvallis Clinic to Optum, Inc.

Received 1/3/24

We are longtime residents of Corvallis and longtime patients of doctors within The Corvallis Clinic. We have watched as the clinic has struggled to survive financially but we feel VERY STRONGLY that this sale would further jeopardize Oregonians' access to affordable healthcare. United Healthcare has enriched themselves by offering "Medicare Advantage" which is weakening Medicare and ripping off consumers. We support measures that move towards universal healthcare not the continuation of for-profit business that enriches a few and allows so many to struggle to receive adequate, affordable healthcare!!!

Dianne and Pete Kozak

Corvallis, OR

10. Subject: Corvallis Clinic sale to Optum

Received 1/3/24

I won't claim to be smart enough to know all the ins and outs of the insurance and hospital fields, but it seems to me that the proposed sale of the Corvallis Clinic to Optum is a loss for Corvallis and Oregon. A few examples: recent lawsuit over UHC's use AI (!) to determine healthcare needs for seniors and wrongfully denying coverage (an alleged 90% denial rate!). Optum in NJ was fined just a few weeks ago for HIPAA violations. An Iowa pharmacy is currently suing Optum/UHC over their predatory fee structure. There have also been antitrust suits (and likely more to come) regarding their acquisitions. This is the opposite of what Oregon voters have said they want the future of healthcare in Oregon to be. Not private, for-profit, but accessible, publicly-funded care. Please deny this sale and find ways to support independent medical facilities as Oregon (hopefully) pushes towards universal healthcare.

Kimberly Callahan

Corvallis, OR

11. Subject: Optum

Received 1/3/24

Hi, I saw the article about Optum purchasing the Corvallis clinic. This concerns me as a patient of the Corvallis clinic and a behavioral health provider in private practice. Optum reimburses providers at one of the lowest rates in the industry. This is why many providers are opting out of the Optum network. I believe Optum wants to purchase the Corvallis clinic so they can continue to pay low rates to providers. I also believe it's a conflict of interest for an insurance company to own a medical facility. Insurance companies are already trying to dictate medical care, which is not ethical. Medical providers should be the ones deciding what is medically necessary, not insurance companies.

Sincerely,

Colleen Webb, LPC

2/6/2024

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12. Subject: Re: Optum purchasing the Corvallis Clinic

Received 1/3/24

I am writing to strongly oppose the purchase of the Corvallis Clinic, an 11 clinic group of independent physicians that serves the Linn, Benton, and Lincoln counties. To lose this precious medical resource to the largest for profit medical corporation in the nation is a travesty and a betrayal of both the will of the Oregon voters and our local consumers, of whom I am one.

United Health Care has been buying up independent medical clinics all over the nation. This will only result in increased costs and decreased services for the consumer and lowered pay for the providers, and offers no overall benefit to medical care.

Oregonians have elected to ensure affordable and equitable healthcare throughout our state. This purchase will stand in the way of that goal and must be voided.

I speak as a retired ER RN. I don't want to see increased emergency burdens due to a failure of access. We cannot allow this purchase to go through.

Thank you

Shelley Ries RN

13. Subject: Optum

Received 1/3/24

I want to express my grave concerns about Optum purchasing the Corvallis Clinic. As a doctor in Eugene who has witnessed firsthand what happened when Optum took over a local multispecialty clinic (Oregon Medical Group), it saddens me to see how destructive Optum is to patient care and access. OMG has lost a substantial fraction of their providers since the merger (30-40%). Physician morale plummeted. Patients have lost access to primary care. As a subspecialist, I have to provide more primary care services to my patients who no longer have PCP's.

The stories I have heard from doctors within OMG are absolutely terrible. I wrote a tweet string about one of them: https://x.com/jeff_sharman/status/1689129046486261762?s=20

I hope that if the merger goes through, Optum is held to certain quality metrics or face penalties. Patients will suffer if this merger goes through.

Jeff Sharman M.D.

Medical Director of Hematology Research

US Oncology Network

Willamette Valley Cancer Institute

Eugene, OR

14. Subject: Oppose Proposed Optum Acquisition of Corvallis Clinic

Received 1/3/24

Part of a recent letter to the editor regarding practices of United Health Care stated:

“UnitedHealth Group, the largest Medicare Advantage provider with 7.6 million people in its plans, generated \$257 billion in premium revenues in 2022, some 13% over the previous year. A significant driver of that growth was its Medicare Advantage plans, the company's financial filings said”.

This is just premium revenues – what you and I pay – and does not include the bulk of advantage plans income. That income comes directly from Medicare and the sum per patient depends on two factors – local health care practices and the health of each beneficiary – also known as risk adjustment. In other words – the more they find wrong with you the more money they receive. Their goal is not to maximize care – it is to maximize profit.

This is another case of redistribution of wealth – taking health care tax dollars and health care premium dollars – profiting and rewarding share holders. Is this how we want our health dollars distributed? Profit and health care should not reside in the same sentence!

And this is why I strongly oppose the proposed acquisition.

Sincerely,

Joanna Nuccio-Stockslager

15. Subject: Optum and the Corvallis Clinic - YES

Received 1/3/24

The Corvallis Clinic is bleeding money every month, and has reduced physician salaries, abandoned one of their sites, and stopped paying rent on their main location. The financial situation is dire.

I understand that many patients want Universal Healthcare, and see this as a step in the wrong direction. What they don't see is that a NO SALE verdict will not grant this. Instead, the Corvallis Clinic will fold. More than 500 people will be out of a job. Physicians will leave the area. Patients will have fewer and worse options for their healthcare needs.

Please vote YES for Optum to purchase the Corvallis Clinic.

Marganne Huang

16. Subject: Optum/Corvallis Clinic

Received 1/4/24

To: Oregon Health Authority

CC: Rep. Shelly Boshart-Davis

Sen. Sara Gelser-Blouin

Subj: Corvallis Clinic-Optum sale-purchase

2/6/2024

I have recently become aware of an intended sale of Corvallis Clinic to Optum MSO- Oregon, a subsidiary of United Health care.

I am asking you to reject this sale/merger.

Generally I am a 'free market' kind of guy, but I am also aware the consolidation of economic or political power is not good for the consumer. Whether the power is lodged in a large corporation that can control a large section or any portion of an economy or a government bureaucracy that exerts undo power on the electorate...both are wrong and unhealthy for the citizens and consumers.

With Optum being a subsidiary of United Health Care it is unclear whether the United Health care business model will be used by Optum. My wife and I have had United Health Care insurance in the past and our experience was disastrous. It limited needed medical procedures and didn't cooperate with medical professional recommendations in order to save them money. Other health insurance companies covered the recommendations of the provider. United Health was slow in paying and our providers were calling asking us to pressure United Health Care to pay the provider. With Optum being a subsidiary, it could be believed they will follow the United Health Care business model.

While Optum says it will retain all providers and departments, with the United Health care business model, there is no long term guarantee they will continue offering those services to their patients. Most purchases of this type result in consolidation of services and elimination of less profitable departments of the newly purchased company.

There have been rumors about Corvallis Clinic's financial stability for a while now and while this sale may fix the financial crises for Corvallis Clinic, I have little confidence in the continuation of the quality and level of service provided by Optum. If approved, strict conditions regarding Optum's quality and level of service must be installed and monitored by the Oregon Health Authority.

Further, United Health Care has recently demonstrated unfortunate behavior in dealing with Samaritan Health Services and there is no guarantee that same behavior won't continue with the purchase of Corvallis Clinic by their subsidiary.

I would support the sale of Corvallis Clinic to another entity unrelated to United Health care.

Dave Perry

Albany, Ore

17. Subject: optum

Received 1/4/24

I oppose the attempted takeover of the Corvallis Clinic by Optum Oregon MSO.

I was a physician at the clinic between 1984 and 2002.

During my time there, an attempt was made to "merge" three clinics into a group. One of the groups was the Metropolitan Clinic in Portland and the other was the Willamette Clinic in Eugene, if I remember correctly. The merger was sold to the Clinic physicians as "instantly" tripling our investment in the clinic because of "efficiencies of scale." To join the Corvallis Clinic cost ~\$65,000

back then. Only myself and two other physicians objected to the plan as it was not going to do anything for patients. We felt it was just designed to introduce another middleman to skim profits.

Needless to say, greed won the day and the Clinic physicians voted to join.

Within a year or two, the "super clinic" was untenable and folded. The CEO of the deal landed softly with a huge golden parachute and the clinic shareholders lost all of their buy in.

It is shameful to consider making the same mistake twice even if there was no risk to patient care.

However, the only way to squeeze profit from health care is to refuse/delay care and to replace excellent physicians with cheaper resources.

This will certainly lower the quality of care.

<https://www.ncbi.nlm.nih.gov/books/NBK217902/>

<https://www.ncbi.nlm.nih.gov/books/NBK217912/>

<https://news.harvard.edu/gazette/story/2024/01/healthcare-riskier-for-patients-at-private-equity-hospitals/>

Lloyd H Wiggins, MD FACP
Senior Aviation Medical Examiner
Corvallis, OR

18. Subject: Corvallis Clinic acquisition by Optum

Received 1/4/24

I am retired patient who receives his care at the North Albany Corvallis Clinic. I was unsure how to respond to this situation until I read Dr. Bruce Thomson's response. I agree with him completely. While I'm mostly satisfied with the care I receive, I would be very frustrated with chaos that would occur should my care be compromised. Dave Knowlton

19. Subject: Optum

Received 1/4/24

I am a resident in Benton County, Oregon. I've been using The Corvallis Clinic for medical service for the last 10 years, after moving to the area from Eugene. When I became eligible for Medicare, I chose United Healthcare Medicare advantage insurance mainly because of the cost of the policy. The quality of care from the Corvallis Clinic has been good overall. The quality of customer service from United Healthcare has not been great overall. But I kept using them because of limited other options. With the renewal period in the fall of 2023, I was informed that Samaritan Hospital / Samaritan Medical was not signing a contract with United Healthcare for 2024. It makes sense now that I know that United Healthcare wants to buy The Corvallis Clinic! At the start of this year I changed insurance plans to Samaritan Medical. I had read and heard about the payment issues that United Healthcare was doing to the clinic, pharmacy, and other doctors. That, and the fact that going to Samaritan Hospital would be out of network was the reason for dropping United Healthcare insurance.

I personally think that United Healthcare / Optum should not be allowed to purchase The Corvallis Clinic and grow its tentacles in Oregon any more than it already has. If anything, The Corvallis Clinic and Samaritan Health should merge into one entity which would allow better sharing of services in the area.

The quality of medical care has decreased since the Covid outbreak and has shown how delicate overall the medical system is in this state and country. Putting care into one large for profit medical corporation would not be the way to go for the future.

Bill Kremer

20. Subject: Optum

Received 1/4/24

Hello,

I am concerned what the impact of the merger between the Corvallis Clinic and United Health Care will have on my access to health care in Corvallis. I'm following news on the various lawsuits UHC is facing, particularly with regards to pharmacies. My pharmacy of choice is a small independent one that I can walk to from my home. What will UHC do to my small pharmacy?

I ended up having to change my Medicare Advantage plan this year, as Samaritan Health Services dropped UHC plans due to poor communication and lack of payment.

What is going to happen next?

Sincerely,

Diana Allen

21. Subject: OPTUM buyout of Corvallis Clinic

Received 1/4/24

As a retired resident of Lincoln County, this proposed buyout needs careful evaluation. Both MODA and REGENCE left Lincoln County with little or no fanfare on December 31, 2023 making Samaritan Health the ONLY provider for Medicare residents of Lincoln County. Samaritan Health is a HMO, which provides certain limitations, but with the Corvallis Clinic many of those limitations are minimized.

With the issues surrounding United Health Care, it is unclear what the ramifications will be in a relationship with Samaritan Health and subsequently with seniors living in Lincoln County, and other counties. A clear path understanding of how OPTUM would operate and cooperate with Samaritan Health is necessary to be communicated to stakeholders, i.e. those who would use the services, and how the relationship with Samaritan Health would be impacted.

Thank you for listening and I hope that those questions cited above will be answered in a clear, concise manner publicly - no matter what the final decision is.

Glen Morris

Waldport, OR

22. Subject: Optum MCO -Corvallis Clinic proposed takeover

Received 1/4/24

Dear OHA,

I am writing to oppose allowing the CorvallisClinic to be managed by Optum MSO.

Optum and United Healthcare are horrible companies. They are ruining healthcare, all for the pockets of their investors.

Our healthcare office (physical therapy) chose to discontinue doing business with United Healthcare and Optum Health about a year ago because of their unfair practices, poor reimbursement and high patient co-pays. Their for profit business model shows no regard for human life nor the well being of their covered lives, despite the promises made in their expensive commercials, paid for by health care premiums. Premiums which should go to caring for people. Oregon would be a better place without this takeover of management services.

The local hospital system in Corvallis, Albany and Lebanon, Samaritan Health Systems, recently dropped their contracts with United Healthcare as well. This is a trend all over the country. I stand by their decisions.

For the community of Corvallis, Optum managing the Corvallis Clinic would create an odd void of care for patients who might be led to stay with UHC coverage because they think their doctor will be dropping out of Medicare, which THE Corvallis Clinic said was their plan for 2024. Imagine people having a PCP in Corvallis but having to transfer out of the community to a different hospital system.

The Corvallis Clinic already overworks their providers, and in general, mismanages their day to day operations. Patients have a difficult time getting in to their providers as well. There is a serious lack of primary care in Corvallis, and the likely attrition that will occur will be devastating to the already delicate balance of healthcare in this area. Where people new to the community can't get a primary care doctor for 6-8 months, and the expectation is to use urgent care since your pcp has no openings for weeks to months.

Please do not allow this horrible company to take over management of our local physician owned clinic for 50 years. There must be other better options for them.

Respectfully,

Dana Hughes

23. Subject: Optum Acquisition of The Corvallis Clinic

Received 1/4/24

To Oregon Health Authority,

My wife and I live on the Oregon Coast just north of Yachats. She is presently seeing an endocrinologist at the Clinic and my life was saved by a neurologist there in 2007. I would like to

ask that this acquisition be denied and that the Clinic be purchased and run as a non-profit and an example of how to provide medical care without sending all the money to a Corporation profiting from people being sick. You have allowed these Corporations to close perfectly good hospitals and maternity wards, etc. and increase their monopoly to squeeze ever more profit and bankrupt families seeking to survive. The US government response to Covid Pandemic was done to weaken the Health Care System and make billions of dollars for the already super rich. All Oregonians will continue to suffer if the powers that be allow for profit Corporations to control medical care in our state. The State of California is trying to make it so these Corporations can get even MORE MONEY from Medicare, Medicaid, and any other government funds available and continue to grind our system into the ground! Universal Single Payer is the ONLY way to provide equitable, inexpensive and timely medical care which is a human right despite what any politician or CEO says. It will be the ONLY way to attract and retain qualified caring providers. The savings would allow us to pay them very well rather than strikes and burn out with the present system. The longer we wait to stand up to the greedy capitalists, the people will needlessly suffer and die. I hope you do not let their plan succeed. Shame on you if you do.

Waverly Hayner

YACHATS, OR

24. Subject: regarding Optum acquiring Corvallis Clinic

Received 1/5/24

To Whom It May Concern –

How often does United Health/Optum need to get sued by states or class actions before being called out as inherently unethical and uninterested in public well-being? Do you know their record of lawsuits? For-profit medicine with inadequate government regulation – what could go wrong?

Google lawsuits against UnitedHealth, and you'll get over a million results! This has been true as long as they have been around.

How many of their executives make over \$10,000,000 per year in salary and benefits:

<https://www.beckerspayer.com/payer/unitedhealth-groups-5-highest-paid-executives.html>

I don't know how anyone at UnitedHealth sleeps at night. In my opinion, \$10,000,000 per year in salaries for executives is not a good use of subscriber premiums.

Some Oregon healthcare systems that are trying to operate ethically in the public interest cannot work with them at all and terminated contracts with them: <https://www.samhealth.org/about-samaritan/news-search/2023/09/13/samaritan-terminates-contract-with-united-healthcare>

Oregon does not need an unethical for-profit mega-company. It will not ultimately lead to an improvement in the health of Oregonians. It will siphon money away from health care and into the pockets of the ultra-wealthy and their shareholders.

How about a successful nonprofit company such as Kaiser buying out Corvallis Clinic instead?

David A Hart MD

25. Subject: Optum and Corvallis Clinic

Received 1/5/24

I oppose this buyout of Corvallis Clinic by Optum which I think is United Health Care. Our health care system is already broken partly due to the insurance companies and the public is not being served while the insurance companies are becoming dangerously richer.

Please keep me informed as to how I can help to keep this from happening.

ksgetz

26. Subject: Optum Corvallis - oppose

Received 1/5/24

I am a recent former employee of the Corvallis Clinic (financial analyst) and have worked in similar roles for Samaritan Health Services of Corvallis, and also Eisenhower Healthcare (CA), and Providence (OR).

As a consumer I think competition in our local market will be dramatically reduced by the merger, and responsiveness to local needs likely non-existent.

Optum (thinly veiled UHC) brings nothing positive to the market and only operates as an extractive force in wringing profits from the community. Their only contribution to TCC is to make management decisions that the clinic's executive team and ownership were too timid to make.

If Corvallis Clinic's future depends on a different leadership and ownership structure, it would be better served by a smaller, locally oriented deal.

Michael Smith

27. Subject: Optum, Corvallis Clinic

Received 1/5/24

I understand that United Healthcare is trying to purchase The Corvallis Clinic locations. This would be a great disservice for the people of Oregon. Samaritan Hospital has already terminated their affiliation with United Healthcare due to the difficulty of receiving payments from them. My wife and I are seniors who live in Corvallis and rely on Samaritan Hospital and Corvallis Clinic for accessible healthcare. There are many, many people that have had to leave the United Healthcare Insurance program and find new health insurance that covers them in the Corvallis area (my wife and I included).

Please stop this buyout! It hurts Corvallis, and all of Oregon.

Thanks for listening.

Marvin and Melissa Jackson, Corvallis

28. Subject: Optum proposed acquisition of Corvallis Clinic

Received 1/5/24

As someone who has been a patient at the Corvallis Clinic since I was 2 years old, please I beg you not to allow United Healthcare (one of the largest companies in the world) to take over the Corvallis Clinic. Oregon already has too many out of state mega-corps controlling services in our communities. It's anti-competitive. UHC is quashing competition around the country. It should not be allowed to control our health care in Corvallis.

Thank you for considering this comment.

Sincerely,

Lisanne Pearcy

Dallas, OR

29. Subject: Optum

Received 1/5/24

We are a democratic state. We are not pro Corporation in the state of Oregon. It would be far better to either expropriate and fund Corvallis Clinic directly from taxpayer money if it is beginning to fail then to let a private sector entity come in and drive up the cost of care for patients so that a CEO can earn millions of dollars each year. Deny this merger and help Corvallis Clinic out directly like government should. Knock of the NEO-Liberal Regeanite nonsense. Optum will harm citizens worse than an increased tax burden.

-Thomas Prislac

MEDC Senior Auditor, Oregon Department of Revenue.

30. Subject: proposed Optum/UnitedHealthcare buyout of The Corvallis Clinic

Received 1/5/24

I urge OHA to block this buyout. United/Optum is known throughout the US for terrible actions that continually put profit above healthcare, and I am shocked and saddened to see that they are proposing to buy TCC. My family and I have been receiving the majority of our healthcare through TCC since we moved to Corvallis in 2016. We have received excellent care throughout that time, whether through pregnancy, raising our son, getting Lasik eye surgery, and trying to keep ourselves healthy. We have had wonderful experiences with solid primary care for all three family members, vision, ENT, diagnostic imaging, vaccines, accessible immediate care, and on and on. I have never been in a place where we had such consistently great experiences with a clinic system that provides nearly all of our healthcare needs. If the clinic system is bought out by Optum, we will almost certainly choose elsewhere for our healthcare. TCC is an invaluable pillar in the healthcare system for the Willamette Valley and I am loathe to see it ruined by a greedy company that repeatedly puts profits over people.

Please protect the people of Oregon.

Thank you,

Erin Crozier
Philomath, OR

31. Subject: Optum takeover of Corvallis Clinic

Received 1/6/24

Dear OHA, I have been a patient of the Corvallis Clinic for decades. Both of my parents still live in Corvallis and get care from the Corvallis Clinic as well as from the nonprofit Samaritan hospital and doctors. As you may know, in 2024 Samaritan stopped taking UHC insurance due to slow-to-no payment and difficulty getting procedures approved. I was with my mother in the ER in 2023 when she was made to sign a paper saying she was only going to a hospital bed for "observation" and was not being "admitted" to the hospital -- even though they wanted her to stay there for a couple of nights! I learned later that this is because her Medicare Advantage plan, with UHC, would provide better coverage or get quicker approval if she were not technically "admitted." Craziness. Now my parents have Samaritan insurance for 2024, which is better for the local economy and for their ability to get hospital care when needed. Samaritan insurance covers services at the Corvallis Clinic.

My biggest fear would be that the Clinic, under Optum/UHC, would not accept Samaritan insurance. They might not accept any insurance but their own! This would cripple Corvallis medically. Patients like my parents, with Samaritan insurance, would not be able to keep their primary care docs and other providers at the Clinic because they would be "out-of-network." There are simply not enough other primary care docs in Corvallis or the surrounding area. Most are at Corvallis Clinic. If my parents changed back to UHC Medicare Advantage plans so they could see Clinic docs, then they would not be able to go to the only hospital in Corvallis! This mutual exclusivity clearly would harm Corvallis residents and their access to care.

I'm opposed to this deal because I believe the Clinic could find another buyer or investors (more local) besides UHC. But if you approve it, I feel you must REQUIRE Optum to continue accepting Samaritan's insurance plans as "in-network" at the Corvallis Clinic. Samaritan has their own financial problems, and integrating their own insurance coverage with their hospital was beneficial for them and thus for the local economy. I was glad they stood up to UHC and their crummy, long-delayed reimbursements. If you make this requirement, and it ever expires, I fear that Optum will then take over (buy out) Samaritan hospital, too. Putting accountability for medical decisions into the hands of mega for-profit corporations is the wrong direction to be moving.

Thank you, Lisanne Pearcy

32. Subject: Please don't allow this Optum tragedy

Received 1/6/24

For the sake of Oregon health finances and the health care of Oregonians, please do as much investigation into this company as needed to verify my warning based on my years of experience with them.

After spending enough hours to amount to days of my life on the telephone with UHC and Optum patiently trying repeatedly to obtain compensation owed to me by them for around 20 patients I spent much time with, I never succeeded before I retired. Then when I tried after retirement they

said because I didn't have a license I could not be compensated. I pointed out the fact that indeed I did have a license when I treated the patients, and 1-3 years after seeing those patients I retired and of course now do not have a license. I also pointed out the fact that only days preceding each of my calls I in fact HAD been compensated by other branches of UHC for other patients I had seen. In short, I learned of many schemes they use to not pay what they owe and also to deny some patients from clearly necessary treatment and imaging. I have had no such negative experiences with any other health insurance companies. I believe firmly that UHC is a profit mongering danger to the public good and not an entity whose interest is health.

Can the state of Oregon purchase Corvallis Clinic?

Sincerely,

Renee E.

33. Subject: Optum

Received 1/6/24

Hi,

I am writing to oppose the sale of the Corvallis Clinic to Optum/ United Healthcare. I have been a behavioral health provider in Oregon for over 20 years and I refuse to work with any entity related to United Health Care. I have found them to be unethical in incompetent with providing the very basic of services to providers.

Warmly,

Kevin Riley

--

Kevin Y. Riley LCSW, CADC III

(he/him)

Corvallis, OR

cedartreewellness.com

34. Subject: Optum& Corvallis Clinic

Received 1/6/24

I am writing to state my opposition to the acquisition of The Corvallis Clinic by Optum.

The takeover of a local, physician-owned clinic by a subsidiary of United Health Care, the largest health insurance company on earth would be a loss for Corvallis as well as a move in the opposite direction for fair and affordable health care run by those in their own community. I am in favor of SB 2089, Health Care for All in Oregon, and not Health Care for Corporate Profits.

Please do not approve this takeover!!!

- Mary Geary, Corvallis, OR

35. Subject: Optum merger with Corvallis Clinic (against)

Received 1/6/24

Hello,

In my opinion the quality and accessibility of health care in the Willamette valley have degraded in spite of expanded facilities. I don't see a scenario where United Healthcare would improve this in any way. Under United Healthcare, business drivers would ultimately be based on insurance profits rather than healthcare services profits. While neither are to the benefit of the patient's health and well-being, having the insurance business owning the healthcare providers seems like it would only distance the customers' needs further from the drivers that direct business decisions.

Regards,

Steve Kimura

36. Subject: OPTUM

Received 1/6/24

NO, do not allow Optum buyout of the Corvallis Clinic. This will only increase unavailability of physicians and healthcare for Oregon.

Lisa Katz

37. Subject: OPTUM and United Health Care are HORRIBLE PROFIT MAKING _SERVICE DENYING MEGACORPORATION

Received 1/6/24

UHC IS A ROTTEN CORPORATION INTENT ON MAKING HUGE PROFITS AT THE EXPENSE OF PATIENT CARE

ROTTEN UHC HAS AN EVIL SUBSIDIARY CALLED optum

OPTUM IS ROTTEN COMPANY

OPTUM DENIES TREATMENT AND MEDICATIONS TO SUBSCRIBERS

DO NOT ALLOW THE PURCHASE OF CORVALLIS CLINIC BY THE ROTTEN EVIL CORTPORATION UNITED HEALTH CARE

ROTTEN UHC AND OPTUM - MAKING HUGE PROFITS OFF OF DEATH AND ILLNESS

ROTTENUHC AND OPTUM GRREDY EVIL CORPORATE MURDERERES

**** Dennis Sheldrick *****

38. Subject: Re: OPTUM and United Health Care are HORRIBLE PROFIT MAKING _SERVICE DENYING MEGACORPORATION

Received 1/6/24

STOP THE PROFIT HUNGRY ROTTEN UHC

DO NOT ALLOW THE ROTTEN UHC TO DESTROY THE CORVALLIS CLINIC

OPTUM IS THERE TO DENY SERVICE AND TAKE MONEY

PROFIT = UHC

PROFIT = UHC

**** Dennis Sheldrick *****

UHC IS A ROTTEN CORPORATION INTENT ON MAKING HUGE PROFITS
AT THE EXPENSE OF PATIENT CARE

ROTTEN UHC HAS AN EVIL SUBSIDIARY CALLED optum

OPTUM IS ROTTEN COMPANY
OPTUM DENIES TREATMENT AND MEDICATIONS TO SUBSCRIBERS

DO NOT ALLOW THE PURCHASE OF CORVALLIS CLINIC BY THE
ROTTEN EVIL CORPORATION UNITED HEALTH CARE

ROTTEN UHC AND OPTUM - MAKING HUGE PROFITS OFF OF DEATH
AND ILLNESS

ROTTENUHC AND OPTUM GRREDY EVIL CORPORATE MURDERERES

**** Dennis Sheldrick *****

39. Subject: Optum proposed buyout

Received 1/6/24

I don't believe that Oregon Health Authority should allow the merger with Optum.

United Health Care has disrupted so many of our advantage members in the Willamette

Valley with Samaritan no longer accepting United Health Care Advantage plan. I

understand that around the country, United Health Care has a bad reputation of
not paying hospitals in a timely manner.

Hopefully, you will have fully vetted their business practices before allowing this
merger to go forward.

It is not ok for Corvallis Clinic to remain a tax exempt nonprofit corporation if it's
bought out by a publicly traded for profit insurance giant.

Thank you for your consideration,

Deb Scobie

40. Subject: Optum

Received 1/6/24

I'm not sure. It sounds good but how accessible is this amazing new clinic to us seniors. A lot of us seniors don't have the ability to drive even though it would be rather centrally located.

If it would raise my AARP United Healthcare premium, which I am struggling to pay the \$308.00 a month. Then NO.

Thanks for the chance to give my input

Marilyn Henderson

41. Subject: Optum

Received 1/6/24

I strongly object to selling the Corvallis Clinic to Optum. United Healthcare has a very bad track record, as witnessed locally by Good Sam's cutting them as an insurance provider, due to problems with payments. This is not new; in California my sister had to pay for her own breast cancer surgery because none of the local physicians would take her UHC insurance. The health care in Corvallis and the Benton County region is excellent due to the high quality of healthcare at both the Corvallis Clinic and Good Sam. Please, please do not degrade our healthcare system by allowing this huge for profit corporation to take over our healthcare!

Thank you for this consideration!

Catolyn

42. Subject: Optum

Received 1/6/24

To Oregon Health Authority,

Please say no to Optum in its attempt to acquire the Corvallis Clinic. It is doubtful a national corporation will understand the needs of our community. In addition, United Health is known for providing poor health care; they prioritize their bottom line over everything else. Increasing their presence in our community would not be good for us.

Bonnie Esbensen

Corvallis, OR

43. Subject: Acquisition of the Corvallis Clinic by Optum

Received 1/6/24

To Whom it May Concern:

I oppose the acquisition of the Corvallis Clinic by Optum which is controlled by United Healthcare. I am a patient of the Corvallis Clinic and have received excellent care over the many years in which I have been a patient. This acquisition would represent a loss of local control of my

healthcare and place decisions about my healthcare in the hands of a large, for profit health insurance company instead of in the hands of my providers.

This idea is exactly the opposite of what we are striving for here in Oregon. The Oregon constitution now has a mandate to provide universal healthcare to all of its inhabitants. This is best accomplished through an Oregon government run program and not a large for profit national health insurance company that is more beholden to its stockholders than to its patients.

Thank you for your consideration.

Sincerely,

Susan Aronson

Corvallis, OR

44. Subject: Optum & Corvallis Clinic

Received 1/6/24

Dear Sirs:

I'm writing to you because I have concerns about the direction Oregon and the rest of the country in regards to Optum taking over. Right now in Corvallis, OR, they are in talks of taking over Corvallis Clinic. It only go to drive up costs and reduce care! Here is a link from Katie Gudiksen for your reference. <https://sourceonhealthcare.org/profile/oregons-work-in-reviewing-hospital-mergers-sets-example-for-other-states-as-consolidation-drives-cost-increases-mergers/>

I hope you will considered this matter and stop this from moving forward.

Thank you for your time.

Sincerely,

Moira O'Sullivan

--

Moira O'Sullivan
Artist of Everyday Life

45. Subject: FW: Re: Proposed sale of The Corvallis Clinic to United Health/Optum

Received 1/6/24

Hello,

My family and I have been patients at the Corvallis Clinic for almost 30 years and have had great doctors, nurses, and service from them through that time.

We just heard about the pending sale of The Corvallis Clinic to United Health/Optum and have grave concerns about this sale. I used to work in the health insurance industry and United Healthcare has a well-deserved reputation as a bully and absolutely ruthless competitor who only cares about profits, not people/patients.

Locally owned Samaritan Healthcare just dropped accepting United Health/Optum insurance due to United Health bullying Samaritan and lack of payments (late reimbursements, refusing reimbursements, obfuscation, etc.). This proposed buyout of The Corvallis Clinic by United Health is likely a retaliatory step being taken by United Health to take over a local clinic that is in direct competition with Samaritan so that they can use their corporate power and money to allow The Corvallis Clinic to out-compete against Samaritan.

Also, we understand that United Health/Optum is currently buying up as many local clinics in Oregon (e.g. in Eugene, Portland, etc.) as one step in their strategy to defeat universal health care in Oregon. Despicable!

Thus, we are asking OHA to block this purchase and the purchase by United Health of any other health care provider in Oregon. Otherwise, United Health will build upon their existing monopoly to block universal healthcare throughout Oregon and the country, reduce service levels, and make healthcare more costly to all citizens.

Thank you for your support!

Paul Schlegelmann

Corvallis, OR

P.S. I am resending this email to include the word "Optum" as recommended by OHA.

46. Subject: Optum

Received 1/6/24

From the bit of research I've done quickly via Google, this company seems to have a bit of a reputation. My gut instinct based on this quick Google would be not to support a sale to them. Or, if there is a sale, some very strict oversight based on what I've read.

For instance, this website:

<https://www.klcc.org/health-medicine/2024-01-05/health-care-giant-wants-to-buy-locally-owned-corvallis-clinic-chain>

47. Subject: Optum - Commentary

Received 1/6/24

Greetings,

I have been a patient at the Corvallis Clinic for 41 years now. I have also been impacted by the recent Samaritan Health Services vs. United Health Care conflict and apparent litigation. These experiences have resulted in a very negative view towards the business practices of United Health Care (aka Optum). They consistently place their investor interests over quality patient care and services.

The proposed purchase of the Corvallis Clinic by United Health Care/Optum is a very bad idea, and will likely result in a degradation of health services in the Mid-Willamette valley region. On behalf of better patient care and local health care services, please reject this proposed purchase.

Sincerely,

2/6/2024

23

Dan Kearn

Philomath, OR

48. Subject: Optum United Health Group Purchase of Corvallis Clinic

Received 1/6/24

Please accept this as my objection to the purchase of The Corvallis Clinic by UnitedHealth Optum. I do not believe it's in the best interest of the patients in the service area.

Thank you

Deb Comini

49. Subject: Stop the Optum/United Healthcare takeover of Corvallis Clinic.....

Received 1/6/24

To Oregon Health Authority,

PLEASE.....stop the Optum/United Healthcare takeover of Corvallis Clinic! I'm referring to the article in the 1/6/24 Corvallis Gazette Times

The double-speak of this company is mind-boggling. On the one hand it is a private equity company that says it's going to make things better, more efficient etc. but keep it as a non-profit company. Later in the article it makes it clear they hope to sell the clinic in a few years for a profit! So...how stupid do they think we are? What would motivate any company to "buy" a non-profit, make "investments" for improvement, and then expect to sell it for a profit?!

Nonsense – it will just gouge everyone and make healthcare more expensive and less responsive.

What Oregon should spend its energy and time on is to establish a true non-profit formal "healthcare for all" system!

Regards,

Casey and Susan

Casey and Susan Hoekstra

Corvallis, Oregon

50. Subject: Proposed Optum acquisition of Corvallis Clinic

Received 1/6/24

Dear Oregon Health Authority:

It seems that the Corvallis Clinic wants to sell itself to Optum, a subsidiary of UnitedHealth Group. Several of my medical providers are at the Corvallis Clinic.

My question is, who will benefit most, the gigantic corporation or ordinary people who need health care that is accessible, affordable, and effective? If the former, I firmly oppose this sale and hope you will too.

Sincerely,

Lorraine Anderson

Corvallis, OR

51. Subject: Optum purchase of Corvallis Clinic

Received 1/6/24

I am writing to express my opposition to the purchase of the Corvallis Clinic by Optum Health and its parent company United Health Care. This huge national corporation has a long history of sacrificing the needs of patients and subscribers in order to increase its profits. Most recently we have seen this in Samaritan Health System's decision to stop accepting United Health Care's insurance products because of United's pattern of withholding payments and reducing payments for legitimate services which have been rendered. For years United has been locked in legal struggles with mental health providers because of United's concerted efforts to circumvent or ignore the mandates of federal mental health parity laws, impeding access to needed mental health care for thousands of people insured by United. We can not let this unscrupulous company into our community to disrupt the provision of health care to our citizens.

Michael DeLollis, MD

Corvallis, OR

52. Subject: Optum - Comment on UnitedHealth buying Corvallis Clinic

Received 1/6/24

Dear Oregon Health Authority,

I am submitting my comment per this article discovered online: <https://www.klcc.org/health-medicine/2024-01-05/health-care-giant-wants-to-buy-locally-owned-corvallis-clinic-chain>

I am an Albany Oregon resident with family members that utilize Corvallis Clinic and I would rather see Corvallis Clinic completely fold, close, go away than witness them sell to UnitedHealth.

The well documented, unscrupulous and shady practices of UnitedHealth proves they ARE NOT PATIENT CENTERED. They are PURELY PROFIT MOTIVATED and Oregon needs to step up and NIX THIS DEAL.

This UnitedHealth and Corvallis Clinic situation is a test for Oregon and the public is watching. If Oregon allows the deal, there better be conditions and consequences that actually have bite.

What a truly horrifying and sad situation. I'd rather see my tax dollars help Corvallis Clinic recover financially and get back on track.

All of healthcare seems so broken these days and only getting worse. Please don't encourage monopolies in healthcare. NOTHING GOOD will come of that.

Sincerely,

Merrisa Knox

Albany Oregon

2/6/2024

53. Subject: Optum buying Corvallis Clinic

Received 1/6/24

Hello, I am a resident of Corvallis, writing to ask for you to reject the sale of Corvallis Clinic to Optum, which is a part of United Healthcare. We know that United Healthcare has been involved in scams and is profit driven. We know that our only local hospital has not renewed their contract with United Healthcare because they were not negotiating fairly with hospital reimbursements. So patients in this area will suffer because of United Healthcare owning the largest clinic and the only hospital not taking United Healthcare insurance. It will disrupt the two systems from working together as they have been.

I also am opposed to large for profit companies coming in here and controlling our healthcare. We will suffer because they are making their profits off of us and taking it out of our community.

It is not for our best good. Corvallis clinic should try to find another buyer and keep it local.

Thank you, - Berthe Palmrose

Corvallis Or.

54. Subject: Optum

Received 1/6/24

I am no specialist, economic or medical, but have strong reservations about this proposed acquisition. I have heard too many stories of folks I know who have quit their jobs after such changes because the larger the organization becomes the less employee friendly (and patient friendly) the work atmosphere becomes. Something humanly important seems to get lost when institutions become too large.

My inclination is to say I do not support the acquisition and, at the very least, to consider the cost benefit analysis very carefully.

Thank you for the opportunity to comment.

Sarah Deumling

55. Subject: Corvallis Clinic buy-out

Received 1/6/24

I join those who are very concerned about the proposed sale of Corvallis Clinic. While medical care delivery in the U.S. needs a major reorganization, the current proposal deserves a very high level of scrutiny.

Thank you,

Diana Blakney

56. Subject: Optum

Received 1/6/24

I would vote to NOT allow the sale of the Corvallis Clinic to Optum.

Thank you,
Tonia Benham
Corvallis, Oregon

57. Subject: Optum

Received 1/6/24

Hello,

After reading the article in "The Lund Report," I understand that the Corvallis Clinic is in a difficult financial situation, but I do not think it's a good idea for UnitedHealth Group to purchase the clinic. UnitedHealth Group is too big, too corporate, and has a poor reputation.

As a current patient of the Corvallis Clinic, I am concerned that patient services would suffer. As a resident of the mid-valley, I am concerned about the loss of a locally owned, independent healthcare clinic.

Personally, I have a hard time understanding how a non-profit healthcare clinic (like Corvallis Clinic) can not be financially viable. If it's just the effects of the pandemic, is there no way to infuse the clinic with state or federal funds to help it bridge the gap?

I understand that this situation exists within the framework of the greater, increasingly capitalistic national healthcare system, but I hope that there is something that can be done to stop UnitedHealth from swooping in and gobbling up what has been, up until now, an important resource for many patients in the mid-valley.

Thank you,
Heather Krimsly, LCSW

58. Subject: [Untitled]

Received 1/6/24

Please let the Corvallis clinic group stay out of the hands of a giant corporation. The staff, patients and community will suffer if this by out happens.

59. Subject: Corvallis Clinic Optum merger

Received 1/6/24

Hello,

I am a Physician Assistant, working for a small private practice in Corvallis.

I am strongly against the purchase of the Corvallis Clinic by Optum.

Optum's parent company United Healthcare has clearly demonstrated they put profits before patients. This will only continue with their further expansion into Oregon.

Optum has become the largest employers of medical providers in the US. This is only going to further drive up costs and worsen patient care.

I understand and empathize with the plight of The Corvallis Clinic. It is only becoming more difficult for small to medium sized physician owned private practices to survive economically in the current healthcare environment.

However, this merger will negatively impact health care in the Willamette Valley.

Respectfully,

Dean Crowell

Corvallis, OR

60. Subject: Optum

Received 1/6/24

To my knowledge, there is one hospital between Eugene and Salem, Samaritan in Corvallis. Because United Health Care declined to negotiate a decent contract with Samaritan, one where the hospital was not losing money on emergencies covered by UHC, many of us on Medicare were left to find another insurance for coverage. While I understand that it is probably a monetarily favorable move for The Corvallis Clinic, to allow UHC/Optum to purchase them does not seem in the best interest of the many individuals in the community.

Perhaps UHC could negotiate a better contract with the Samaritan Hospital which might make it a reasonable purchase. If I'm left with no hospital in network, I may need to look into relocating.

Jo Ann Hasbach

61. Subject: Optum

Received 1/6/24

I am very concerned about the proposed business deal of Optum, Inc., the largest employer of physicians in the country, taking over The Corvallis Clinic, the largest multi-specialty medical group in the mid-Willamette Valley.

The consolidation of health care systems tends to increase prices and decrease quality. Any trend toward monopolization is harmful to patients.

Please consider how this business deal could affect our local health care.

Thank you,

Rebecca Clark

62. Subject: Oppose merger

Received 1/6/24

Attention OHA,

My name is Deidre Greene I live in Albany, OR and am a semi retired Adult Nurse Practitioner. I want to express my strong opposition to the merger of United Health and the Corvallis Clinic. The merger would interrupt access to healthcare in this area. Oregon Health Authority should consider bringing litigation against United Health for attempting to create a monopoly and their history of bad

practice towards patients and local health care systems. Oregon is most likely being targeted because of the universal health care movement and it is also a punitive move against Samaritan Health Care that recently severed ties with United Healthcare because of their slow pay and reimbursement practices. We must protect the healthcare rights of Oregonians not support these mega private companies that only want to profit off of patients.

Please protect the healthcare of Oregonians and prevent this merger from going through. Also if it does go through I think it is a joke that Corvallis Clinic would maintain a nonprofit status after merging with a for profit monopoly like United Healthcare

Thank you,

Deidre Greene

63. Subject: Optum Oregon MSO & the Corvallis Clinic

Received 1/7/24

Please do not approve the merger between Optum Oregon MSO & The Corvallis Clinic. Optum Oregon MSO is part of The United Health Group. United Health Care is a health insurance company that is part of the United Health Group, UHG. My dentist and Samaritan Health Services will no long accept United Health Care insurance because the insurance does not pay their bills. There was a class action lawsuit filed against UHG over algorithmic care denials in Medicare Advantage plans. Bigger is not better. Please stop this merger. More time is needed on how to solve the financial problems of the Corvallis Clinic.

Karen Nelles, RDN

Concerned Oregon Resident

Corvallis, OR

64. Subject: Fwd: Corvallis Clinic

Received 1/7/24

The Corvallis Clinic has been a locally owned institution and part of the community for years. United Health care has bullied many clinics by not paying for services causing a shortfall for the clinics. Seems to me they should be looked into as a hostile take over.

The question remains, what else will they do. Seems to me our health care has gotten worse instead of better. Doctors and nurses are quitting because of practice restrictions and over burdening.

It is time to think about the communities & not the conglomerates!

Thank you

Sally

65. Subject: Corvallis Clinic

Received 1/7/24

I oppose the merger/ takeover of Corvallis Clinic entities by an out-of-state corporation with a bad reputation for profit over people.

Please, buck the tide and find another way to keep Corvallis Clinic under local control.

Just say "NO" to Optum/ United Healthcare.

Catherine Stearns

Benton County resident

66. Subject: Optum

Received 1/7/24

I oppose the buyout by Optum, part of the UnitedHealth Group, with The Corvallis Clinic.

67. Subject: health care in Oregon....

Received 1/7/24

I am writing to express my concern regarding health care and proposed take overs by big companies like United Health Care. I hope the politicians in this state are paying attention to the attempts to cut costs by big companies and deny care, delay accessibility, and create longer wait times for care.

As it is now, I have to wait an average of 2-3 months for an appointment with a doctor, tests and a diagnosis. If our state allows companies to dictate our needs instead of the doctors that are the experts, we will all suffer extreme consequences of increased chronic diseases, surgeries and deaths. The goal should not be profit over health.

Please support HEALTH CARE FOR ALL OREGON - HCAO, a solution to keep big business out of our health care decisions.

Thank you.

Alicia Van Driel

Lebanon OR

68. Subject: Optum - Corvallis Clinic buyout

Received 1/7/24

Hello,

Medical provider buyouts by large corporations are not in the customer interest. They are about \$\$\$ for private equity firms and investors. The buyer makes big claims that the customer will be better served. In reality, within a few years, customer service gets worse since the private equity firms squeeze money for their investors out of the health care provider. This can already be seen

in Corvallis - the only local hospital - Samaritan is no longer in-network with United Healthcare due to cost-cutting.

Please do not approve this merger.

Tom Bucht

Corvallis, OR

69. Subject: Proposed acquisition of The Corvallis Clinic

Received 1/7/24

My perspective via service for many years as an acute care hospital chaplain, still employed here in Oregon yet now semi-retired:

The proposed Optum Oregon MSO acquisition of The Corvallis Clinic appears to be yet another “do or die” local decision for short-term benefit while increasing long-term harm. Regionally and nationally, this action further pushes out-of-reach the existence of needed universal healthcare reform. Globally, while universal healthcare is demonstrated to produce strong and affordable healthcare outside of the U.S., it is the insurance industry within the U.S. that keeps universal healthcare from taking hold. Optum Inc. is owned by an insurance company, United Health. Short-term local gain for long-term regional and national harm.

The executives of United Health and other large insurers would have us think that their corporate plan for American healthcare reform is the only plan that can work. Reality says, yes, that is true of medical resources for wealthy Americans, yet most other Americans, the large majority of Americans, will have to settle for what is left – indeed, today, we already do.

Respectfully,

Rev. David Watson, MDiv, former BCC

Spiritual Care Hospital Chaplain, semi-retired

Salem OR

70. Subject: Corvallis Clinic buyout

Received 1/7/24

As a patient of the clinic I do not see how the goals of UnitedHealth align well with the local needs of the clinic. We are already struggling with rising costs of living and healthcare and this move seems to shift more power to the corporations that have objectives not in the best interest of local patients.

I urge you to find out their long term goals, to get their commitments in writing to put patient needs first and to ensure that they collocate with all insurance providers in a way to provide all members of the local area access to reasonable and affordable healthcare.

The bureaucracies of insurance and billing are already impacting the level and quality of healthcare. Please don't let Oregon spiral out of control by handing over control of vital and basic human needs.

Aaron Moore

71. Subject: Corvallis Clinic acquisition by United Health; Optum Health

Received 1/7/24

To Whom It May Concern:

As a previous nurse and a patient of the Corvallis Clinic, I am concerned about United Health purchasing the Corvallis Clinic. For one thing, United Health has a bad reputation. They are way too big and are becoming a monopoly, which has never been good for the general public. I realize that the healthcare "business" is a struggle, but there has to be a way to help and protect these vital services without turning them over to a company that has no local connection to our communities and a business practice that is more interested in the dollar than the people. Bigger is not always better. Please put a stop to this and work on how to assist these struggling practices.

Thank you for your consideration.

Charlene Hayden

72. Subject: Optum takeover of Corvallis Clinic

Received 1/7/24

Hello,

I am a long-term patient of Corvallis Clinic and am opposed to the acquisition by Optum Oregon, subsidiary of UnitedHealth Group. Large mergers of health organizations are not in the best interests of patients, doctors, nurses, other employees, or the state. Corvallis Clinic is a physician-owned non-profit organization, which has served the needs in the mid-Willamette Valley quite well.

UnitedHealth is a private insurance company. It is in no way shape or form a non-profit. If the takeover is approved, Corvallis Clinic should lose its non-profit status and Optum should pay full tax rate on its money-making scheme.

Andrew Gray

Corvallis, OR

73. Subject: Optum

Received 1/8/24

Just another concerned patient of Corvallis Clinic that doesn't want the buyout to happen.

Heidi Sterling

74. Subject: United Healthcare (and others) have defrauded the government to enrich themselves at the expense of consumers

Received 1/8/24

<https://www.nytimes.com/2022/10/08/upshot/medicare-advantage-fraud-allegations.html?searchResultPosition=25>

['The Cash Monster Was Insatiable': How Insurers Exploited Medicare for Billions \(Published 2022\)](#)

By next year, half of Medicare beneficiaries will have a private Medicare Advantage plan. Most large insurers in the program have been accused in court of fraud.

www.nytimes.com

As traditional Medicare recipients with a gap plan who do not want to sign up for a private insurance "Advantage" plan we are certain that if Optum (United Healthcare) buys The Corvallis Clinic we will be forced to use United Healthcare's "Advantage" plan as our preferred provider. After 30+ years with The Clinic we will look elsewhere for our healthcare if Optum takes over.

Dianne and Pete Kozak

Corvallis

75. Subject: Against the proposal

Received 1/8/24

I have recently been crossed off the patient list because of my oregon medical group physician as I've not been to see them for 3 years because Covid so I'm now considered a new patient. I call bull shit on this practice!

Dexter Dewey

76. Subject: Optum

Received 1/8/24

Hello-

My husband, Fred, and I are concerned about the buyout of the Corvallis Clinic by United Health. We both have medical coverage through Original Medicare, and we do not know what affect this buyout will have on our ability to continue our health care with our current doctors at the Corvallis Clinic (many of whom we've been with for more than 20 years). Will the Oregon Health Authority be taking this into consideration? Will United Health be required to accept patients and continue serving those of us who are on Original Medicare? We do not want to be forced to move to a United Health Medicare Advantage plan in order to stay with our current doctors. We really need to be able to stay with Original Medicare.

Thank you,

Dianne & Fred Taft

77. Subject: Optum Corvallis Clinic public comment

Received 1/8/24

Hello,

Please do not allow the merger for Optum's proposed buyout of Corvallis Clinic. This merger will jeopardize healthcare coverage and healthcare in our community.

I am a current Corvallis Clinic patient. There are next to no providers other than Corvallis Clinic in the mid-Willamette area, and the increased prices and poor care that comes with this private investment firm, which is fraught with complaints, taking control of the clinic will jeopardize care of mid-Willamette residents.

Please do not allow the merger.

Thanks,

Holly

78. Subject: Optum buyout of corvallis clinic

Received 1/8/24

I am writing to express my opposition to this buyout. If allowed, prices for health care will likely increase. More importantly it will further reduce the likelihood of ever having universal health care in this country. These multinational corporations are gaining more and more control over all aspects of our health care system. This inevitably makes them more powerful and therefore makes it harder to legislate reforms.

Eugene J Braun

Corvallis, OR

79. Subject: Oppose Takeover

Received 1/8/24

As someone who has been involved in healthcare for all of Oregon, I am opposed to the takeover/merger by United Healthcare's Optum Oregon with the Corvallis Clinic for several reasons:

First, last year Oregon voters approved Measure 111, making Oregon the first state to adopt a constitutional right to affordable health care. The passage of senate Bill 1089 established the Universal Health Plan Governance Board to develop proposals to implement a health plan that will ensure that all Oregonians have access to care. Involving another state at this point will only subvert the effort endorsed by a majority of voters to create a fair and equitable healthcare system in Oregon.

Secondly, at the state and national level, we have seen how "merger mania" has played out to the detriment of both workers and consumers as the quality of service and products has diminished while cost savings have accrued to the higher echelons of management.

If more people understood the history of the financialization of our economy (which, in most cases, provides minimal benefit even to the 20% who own stocks) they would more readily reject these mergers and conglomerates. The more local we can keep elements of our economy, the more velocity money has, circulating within the state economy and among more people.

Thank you for your consideration,

Andrew Seles, PCP Jackson County Democrats

Ashland, OR

80. Subject: Optum

Received 1/8/24

To whom it concerns,

I used to work under Optum Health. I am concerned with the potential acquisition of the Corvallis Clinic. I do not think this move will benefit the healthcare of the patients in Benton/Linn County. Furthermore, it could put the viability of Samaritan Health in jeopardy.

Please consider blocking Optum Health. I also hope you will also support the Corvallis Clinic in order to keep the ownership local. I am happy to share my personal experience if you would like, but ask for confidentiality.

Respectfully,

Tom Lin

81. Subject: Optum in Corvallis

Received 1/8/24

Oregon Health Authority,

As a long time patient of the Corvallis Clinic in Corvallis, OR, I was surprised to read of the possible acquisition of the Corvallis Clinic by Optum later this month. The Clinic has been a vital part of our community for the last 75+ years. If it is necessary to be part of the Optum organization for the Clinic to remain vital, then so be it. The important part is that it remains in Corvallis and is able to provide a living wage to physicians and employees, alike. It is also important that the Clinic is able to serve the community, accepting all types of medicare, tricare, and other types of insurance.

Susan Mohr

82. Subject: Optum Oregon Health Authority

Received 1/8/24

This is an absolute NO for me for my Corvallis CLINIC. United Health Care/

Optum are in the business of making money period. They are not about the patient or the amazing staff that are at the clinic. I have had to deal with Optum and United Health Care over the last 2 years. It has been a financial nightmare. Doctors dropping their insurance because of non payment and the many headaches and hoops they would have to jump through. We filed an appeal with one doctor for not paying and what I got was bullying from UHC. We couldn't see doctors because they refused to carry UHC because of non payment. My husband and I got tests in the mail that we didn't ask for and then got hounded to send them back, which we didn't. UHC and Optum are not there for there for the patients, they are there with their hand's out to get lots and lots of money.

I feel that you probably won't even read this or even care or if you do you will just push the delete button and move on .

Once again I would like to emphasize it's a BIG FAT NO FOR MY HUSBAND AND I.

LoriLNeely

83. Subject: Optum

Received 1/8/24

I am totally opposed to this acquisition. The practice of large medical corporations buying out clinics across the country has shown cost of care to go up and outcomes in addition to patient satisfaction to go down. United Health Care made a profit of 2 billion dollars in 2022. That money should have gone to patient care not shareholders and CEO. The Universal Health Care Governance Board in Oregon is starting work this year to transform health care in Oregon. We need to hold off corporate acquisitions for the benefit of patients and let the Governance Board do its work.

Lauri Hoagland FNP

84. Subject: Concern about the reported take-over of The Corvallis Clinic (TCC) by UnitedHealth (OPTUM)

Received 1/8/24

I DO NOT support this proposed sale of TCC to Optum/UnitedHealth).

TCC has been pressuring me and others on OM to move to a Medicare Advantage (MA) program for the last year or more but I do not want to do that. Some characterize MA programs as Medicare [Dis]Advantage programs because companies like United Health Care, not local physicians, end up deciding what medical services are allowed, largely based on cost and profit for them, not on medical need/advisability. That is unacceptable.

My main concern is that TCC may force to move to an MA program, whether or not I want it. I appreciate TCC's financial issues and would hate to see them close altogether. If they continue to accept original Medicare patients, then my concerns would lessen.

What I really want is for the national government and/or the State of Oregon to establish a "medicare for all" program. Expensive, but worth it in the long run and bound to improve the United States' overall health care outcomes at lesser overall cost.

Thank you, James W. Good

James Good

Corvallis, OR

85. Subject: Corvallis Clinic

Received 1/8/24

I am against the acquisition of the Corvallis Clinic by United Healthcare/Optum. I feel the recent issue with United Healthcare/Optum and Good Samaritan should disqualify this merger from going forward. Good Samaritan recently informed patients that they will no longer accept United Healthcare insurance. If you are covered by United Healthcare you will be considered to be out of network which will increase the cost of treatment in a Good Samaritan facility. Good Samaritan is the primary medical service provider in the mid-Willamette valley. This change has affected

approximately 18,000 patients and forced us to seek another insurance plan to maintain adequate insurance coverage.

Bryce Stockslager

Albany, OR

86. Subject: Optum

Received 1/8/24

Thank you for your email regarding Optum. I am very against the take over of Corvallis Clinic. As a past resident of Corvallis I experienced the services of Corvallis Clinic. While the clinic does not provide quality care, it would only get worse if taken over by big business. It might be easier to continue to let the quality of medical and mental health care decline further in Oregon by giving in to large corporations. These corporations only consider quick short term profits through lowering quantity and quality of care and little to no customer service. While claiming to reduce costs, overall the corporation increases costs through over utilization, by pushing staff physicians to order more tests including more expensive tests. They will reduce staffing even further thus reducing access while touting just the opposite. But one of the worst manipulations is demanding access to patients' bank accounts within days, if not minutes, before critical surgeries and other services while implying that the patient's care will be canceled if they don't provide bank account numbers. Personally I have experienced this twice even though I had good insurance and income. One medical facility refused services by not scheduling necessary tests and surgery and not returning calls from my primary physician. Because of my many years working in the medical field (assisted in negotiations between doctors and medical insurance companies, asst. clinic manager, billing, patient care, psychiatric assistant, etc.), I knew to say "No. After services are provided and I receive and review the bill, I will pay in full unless there are errors in the bill." Few people know that they can and should say that. It can be seen throughout Oregon and the US what has happened to access to medical and mental health services when big businesses took over. Administrative needs are intentionally made unnecessarily complicated, to deter mid to lower income sick people from accessing services. Note the word sick. If you are actually sick you are less likely to receive needed care from big corporations.

If you have a high income you will receive:

-medical and mental health services and care

-government entitlements and assistance through income tax deductions, tax credits, tax deferrals, etc. (equivalent to 4 to 5+ times the amount the US spends on assistance to low income people).

-investment

-nutritional food in large quantities

-transportation

-good education

-clean clothing

-extravagant housing

-vacations

-more

If you are mid to low income you will work hard for:

-little to no medical and mental health services or care

-very limited, inadequate government assistance

-food with lower nutritional value

-poorly made clothing and pay to clean at laundromat

-poor, unequal education (leads to no or low paying jobs)

-limited or no transportation (leads to no or low paying jobs)

-adequate, low quality, or no housing

-maybe staycations

-less

Allowing big corporations to continue squeezing everyone who doesn't make over \$100,000+/year is again kicking the can down the road, increasing illness and disability among the majority of Americans. It drastically diminishes our critical workforce. It reduces our ability to create and sustain small businesses on which the US economy is dependent!

Look around us. The rich got richer and the poor got poorer and those few in between are losing the battle. The need for medical and mental health care must be addressed. Optum's or other big business take over will increase the problem and quicken the collapse of Oregon's and the US's medical systems and economy.

Thank you,

Karen (Yes, I am a real Karen who cares about people and her struggling country.)

87. Subject: United health care acquiring Samaritan Health==Optum

Received 1/8/24

As one of the many, many people that had signed up for an advantage plan through United Healthcare I like to address the debacle that has transpired in the last few months. I am a 72 female and have been on an advantage plan for several years. The last four have been with United Health Care and I have had no issues with the coverage that they provided. Nor have my providers that I was aware of.

I believe it was in October 2023 when the local newspaper published an article saying that Samaritan would no longer contract with United Health Care after 2023 expired. In view of the fact that all of the hospitals in the surrounding area are in fact Samaritan facilities, it meant that I would need to change insurance plans. Additionally or perhaps coincidentally, I received a brochure two days later from Samaritan with their own version of health care.

With the help of an insurance broker I chose to enroll in Wellcare/Healthnet PPO during the open enrollment period. The whole experience of choosing and deciding on how to best keep

myself covered is overwhelming and not 'user friendly'. In view of the fact that most of the enrollees in these advantage plans are retired senior citizens, it almost feels like bait and switch and sketchy. As a small example, The Wellcare plan that I now participate in shows up in the welcome package as having a \$1500.00 dental benefit for comprehensive services for exams, fillings and minor restorative services. On the actual website it specifies Medicare approved procedures. Far be it from me to know if either is in fact correct.

Fast forward to January and I read in the paper that United Health Care is now considering buying out Samaritan. I am also informed that the Primary Care doctor I have had for several months are in some dispute and the new policy may not extend beyond March or May of this year. There have been no contracts to that fact yet.

I am one of thousands in the Willamette Valley that are trying to juggle what is best and affordable and find all of the ongoing uncertainty with more that a little skepticism and confusion in regards to health care in the version(s) we now deal with. I understand that it would be impossible for the simple one size fits all option, but this current lack of ease in getting coverage seems ridiculous.

Thank you for giving a forum to voice our thoughts,

Diana Larrabee

88. Subject: OPTUM

Received 1/8/24

To whom it may concern,

I am opposed to the purchase of the Corvallis Clinic by United Health/Optum. For profit health care inevitably results in poor patient outcomes.

What we need in this state is universal health care!!

Jerry Robbins MD

89. Subject: OPTUM- Please Don't Allow CC to Be Sold

Received 1/8/24

Hello,

I am Sheridan Bailey, an Albany (former Corvallis) resident. I have been a patient at Corvallis Clinic for gynecology, primary care, urgent care, lab services, and mental health care. They are the superior health care in the area, in my opinion, as they have connected services such as integrated mental health services, and they are welcoming of more health plans. They also don't sell insurance plans, so they are more centered on patient care. In the Corvallis/ Albany area, there are two main healthcare providers: Samaritan Health and Corvallis Clinic (CC).

I am HORRIFIED to hear that OPTUM may be purchasing CC, as I am positive it will destroy the health care quality and decrease coverage amongst our local population. I am fortunate, I have great insurance coverage, but elderly, impoverished, and at risk communities will be hurt by this, as OPTUM is known for preferring their own coverage and not accepting others. Even Samaritan recently changed to NOT ACCEPTING optum plans, because payment is slower and they cannot keep business with them. Please don't allow Corvallis Clinic to be sold, don't hurt the local

population's healthcare coverage. Please, this change will ruin a great healthcare experience for me, my parents, my friends, my neighbors, and the larger community.

Yours,

Sheridan Bailey

90. Subject: Optum

Received 1/8/24

Sirs:

I recently came across a news article regarding the potential take-over of the Corvallis Clinic by United Health Care. To be blunt, that scares the daylights out of me!

For some time now, I've been hearing rumors that the Clinic was in financial trouble. I've been hearing stories about doctors leaving the Clinic. I'd heard of a doc who was forced out of the Clinic because she didn't push enough patients through the Clinic every day. Whenever I've needed to see a doc, I'm told that the next available time might be four months away. [The last time I saw my family doc, it was four months just to get an appointment and another six months to have the colonoscopy she ordered!] If I need something, I usually go to the Clinic's Immediate Care because the wait time might be only an hour or two rather than four months.

In 2013, Time Magazine had a series of articles about the nation's health care system; it was truly frightening how devastatingly expensive health care had become. (The article is attached.) It told, for example, of hospital patients being charged 100 times the over-the-counter cost for common pills. It told of labs at clinics and hospitals as being great "profit centers" - even at "non" profit facilities. It told of huge cost differences between one provider and another just down the street. It told of huge cost differences when compared to other countries. It told how Medicare costs/payments are mandated by law to reflect the ACTUAL cost but the cost to those not on Medicare can be far higher. [In this community, there is oftentimes but one provider for various tests/procedures so there is little chance to "shop around" for a better price -- a monopoly, perhaps?]

A conclusion I came to some years ago is that the medical industry (clinics, pharmacies, pharmaceutical companies, hospitals, etc.) are in cahoots with the insurance industry. Whether it is collusion, price-fixing, or whatever, I do not know. Many clinics and hospitals were started by physicians who, over time, hired CEOs who were business people; people who are trained to run a business and, not coincidentally, to make money! These people are oftentimes paid six or seven figure salaries and are among the highest paid CEOs in a community; that includes "non-profit" clinics/hospitals and university facilities.

It seems to me that the insurance folks want to keep medical costs high. The patient is then faced with a choice; either pay the high medical cost or buy insurance. Those in the medical industry are okay with that because they get paid by either the patient (their "customer") or the insurance company. To the insurance industry, that is also good because, after all, they are in the business of selling insurance. Being smart business people, they know what their customers pay in premiums and they know what they pay out when their customer needs health care. If medical costs are kept high, the patient will be "encouraged" (forced?) to purchase insurance.

I have a blood disorder and, some years ago, started taking a pill. Initially, the cost was about \$12,000 a month (\$144,000 a year). Each year thereafter, I could dependably expect the cost to go up about \$1,000 a month. In time, the drug was losing its efficacy and I stopped taking it. By that time, it had risen to about \$20,000 a month (\$240,000 year). It would seem to me that, over time as the drug was amortized, it should have gotten cheaper and become more affordable.

However, I was faced with a choice – either pay the cost or buy insurance. Fortunately, I could afford the insurance. [Seems to me I'd read on the internet how some people who could afford neither the insurance nor the drug, choose not to take the drug at all.] Had I not been able to afford the insurance, in a couple years, I'd have been living on the street. I feel as though I've been cheated by both the pharmaceutical company and the insurance company.

Since that drug's efficacy had diminished, the doc recently started me on a clinical trial. At my last visit, he told me the new drug was \$230,000 a year. Fortunately, because this is a trial, the drug company is paying the cost. However, once the trial ends and, assuming the drug works and the FDA will approve, I'll be faced with the same choice – either pay the cost, buy the insurance, or be on the street in a couple years. [At least in the short term, there is no choice!]

In the fall of 2010, I was moving my elderly in-laws from Texas to Oregon. My father-in-law was recovering from a stroke and we had to stop in Chandler, AZ, when my mother-in-law had a medical emergency. Likely due to the stress of it all, my wife was vomiting and went to the emergency room. She was never admitted and no procedures were performed; she just had fluids administered. After 3-4 hours, I was given a bill for about \$13,000 -- that's about \$3-4,000 per hour! It seems the hospital had to perform all sorts of tests just to rule out lots of possible causes. (Given that my wife was in her mid-60s, I thought they might have even performed a pregnancy test!)

Now, how will the patients of the Corvallis Clinic be better served if United Health buys the Clinic? Of late, I've been hearing rumors that some of the local medical people will no longer accept United Health because United Health is too slow making payments. Is that because United Health was putting the squeeze on the Clinic in order to force the Clinic to sell? (Such tactics are not unheard of in the business world.) Initially, I thought this was merely a bargaining ploy between the Clinic and United Health and they'd eventually reach a contractual agreement.

After being bought out, will the Clinic continue to accept other insurance companies or will they make it difficult for patients who do not use United Health? Will United Health dictate how Corvallis Clinic physicians treat their patients? Will insurance directives (i.e., profits) enter into the physician's decision-making process?

As it is, in this part of Oregon, the Corvallis Clinic and Samaritan Health have a virtual monopoly on health care. Will United Health eventually take over Sam Health, too? Will United Health become so dominant that patients can no longer choose their health or insurance providers?

All this frightens me as I see medical decisions being made with United Health's financial self-interest (i.e., dollars and cents) dictating those decisions.

I empathize with the Corvallis Clinic's predicament but cannot see how United Health will better serve people in this area.

Thank you,

Dick Powell

Attachment: Time Magazine - A Bitter Pill (health care costs) -- 2013-4-4.pdf

<https://time.com/198/bitter-pill-why-medical-bills-are-killing-us/>

91. Subject: FW: Protesting Acquisition of The Corvallis Clinic

Received 1/9/24

Hello OHA,

I am protesting the acquisition of The Corvallis Clinic by UHC/Optum. In a few years, profits will be stripped from the clinic and UHC/Optum will sell off the clinic. It's a race to the bottom for everyone including our broken healthcare (insurance) for profit system. This trend is happening all around the country, but Oregon needs to stand up to this trend. The same thing happened in Eugene, but let's stop it here and now in Corvallis.

Please direct this protest email to the appropriate department if necessary.

Sincerely,

Patricia Heublein

92. Subject: FW: United Health Care vs. Oregon Health

Received 1/9/24

7 January 2024

Dear OHA Director & Board Members,

As a Corvallis resident since 1974, I am extremely worried that the Corvallis Clinic is selling to Optum, a United Health Care subsidiary. United Health Care is the largest health-care company in the USA and is buying clinics, hospitals, and private practices to monopolize health care provision and insurance in Oregon and nationally. This is the Walmart/Amazon strategy applied to health care: drive out the competition so it can control both health care provision and health insurance.

Monopolies are designed to maximize their profits rather than consumer interests. This is particularly alarming when it comes to health care. This is one reason that Samaritan Health Care has refused to accept United Health Care insurance. Also, the Huntsman Cancer Institute in Salt Lake City, where I have been treated for cancer, has difficulty having medical procedures reviewed, approved, and being paid by United Health Care.

A United Health Care monopoly will nullify SB 2089, Measure 111, the Oregon Health Plan, and the will of Oregonians. United Health Care is a monopoly that we should NOT welcome in Corvallis or anywhere else.

I urge that you NOT approve the sale of the Corvallis Clinic to Optum for the sake of your own health as well as that of all Oregonians.

Your reply would be appreciated.

Sincerely,

Robert M. Hughes

Corvallis, OR
President, Stone Ridge Home Owners Association
Fellow, American Fisheries Society
Fellow, Society for Freshwater Science
Editor-in-Chief, Water Biology & Security

93. Subject: Re: OPTUM

Received 1/9/24

Addendum: I believe that the community interests would be much better served if Samaritan Health Systems would be allowed to take over the assets of Corvallis Clinic. This would avoid duplication of services, allow for minimal disruption of services, and take the stockholders out of healthcare!

Jerry Robbins MD

To whom it may concern,

I am opposed to the purchase of the Corvallis Clinic by United Health/Optum. For profit health care inevitably results in poor patient outcomes.

What we need in this state is universal health care!!

Jerry Robbins MD

94. Subject: Optum Acquisition

Received 1/9/24

Hello,

I have been a patient and employee of The Corvallis Clinic for the past 31 years. I fully support Optum acquiring our clinic and look forward to the future. It is my hope that we will be able to entice qualified providers who once here will want to stay longer than a year or 2. Being competitive in pay is important for staff, many of whom are supporting a household with one income. Just this week I am losing 3 staff, all going to work in Salem for more money. I am nearing the end of my career, possibly 3 or 4 years before retiring. It is my goal to end it with The Corvallis Clinic. I don't know if this will be possible without outside financial help.

We must also consider the thousands of patients in this area who could be without healthcare if the clinic would have to close their doors.

Thank you for your consideration.

Carrie L. Bolin

NAR Practice Supervisor

95. Subject: Optum Acquisition

Received 1/9/24

Hello,

I have been a resident of Corvallis for 30 years and an employee of The Corvallis Clinic for 18 years. I am writing to support Optum's acquisition of The Corvallis Clinic. I have seen in my work how difficult it is for patients to find primary care doctors in the this community. I have seen how frequently physicians have left the area. I have seen the clinic struggle financially over years. I support this merger because it will provide stable continued healthcare for the patients of the area. Optum will provide financial stability and hopefully help the clinic recruit and retain talented health care providers and staff.

I support this acquisition.

Thank you.

Linda Mast RN

Care Coordination

The Corvallis Clinic at North Albany

96. Subject: Optum

Received 1/9/24

Our daughter died of a brain tumor at age 22 after a 2-1/2 year struggle. We had good employer-based health insurance at the time, but quickly realized that we could have lost our daughter, house, and savings without it. Since that time, we have been strong proponents of universal health care, both nationally and in Oregon.

We live in Corvallis and have been patients of the Clinic since our arrival in 1979. As senior citizens, we appreciate the local service it provides. We are covered by traditional Medicare, Part D, and a supplement.

The purchase of the clinic by UniversalHealth Group presents several major problems:

Primarily, it would allow the fox to guard the hen house. Consolidation would occur for profit rather than patient benefit. There would be no local control to meet local needs.

It would dilute traditional Medicare if Optum requires a switch to UniversalHealth Group's Medicare Advantage program, which seems possible.

UniversalHealth Group was dropped recently by Samaritan Health Services because of its dubious practices. That should be reason enough to prevent its expansion.

It further opens the door for a monopoly in health care services with an adverse affect on a move toward universal health care, which remains in the best interest of Oregon's citizens.

We understand that the Clinic and its physicians have struggled to regain profitability after Covid, but we do not support this merger. We hope you will deny it.

Kay and Peter Eilers

2/6/2024

Corvallis, OR

97. Subject: Optum

Received 1/9/24

As a patient of Corvallis Clinic, I urge you to DENY the sale of Corvallis Clinic to Optum. This deal will only harm patients such as myself.

Thank you,

Michael Dee

98. Subject: Public Comment re: Optum and Corvallis Clinic

Received 1/9/24

Hello,

I'm providing my public comment regarding the upcoming buyout of Corvallis Clinic by UnitedHealth subsidiary, Optum.

I am a 66yo resident of Philomath, Oregon and my doctor (a PA, actually) is part of the Corvallis Clinic system. I've been going to the same facility (Philomath Family Medicine) for over 10 years now and last year I established a relationship with a new-to-the-practice PA. It's been a wonderful relationship where we both know each other, care about each other, and I get excellent care when I need it. I'm healthy for my age but things do come up and she always makes time to answer my questions (online if I can't get an appointment to see her in a timely fashion). I've seen specialists within Corvallis Clinic (knee surgeon, gastroenterologist, etc.) and they've been equally thoughtful and skilled.

Reading the article in the Albany Democrat Herald and hearing the news piece on the radio was a sober wake up call for me. A reminder, if you will, at how messed up our medical system is in the US.

I recognize that any business cannot suffer financial losses for long before it has to change. But my question is "Is this the correct change?" I'd have to look at their financials but I'm wondering how much money per year that a doctor (specifically) has to really make? How much profit do the insurance companies have to really make?

In my humble opinion, moving to a system where the goal of private equity firms is to make a run at buying up struggling doctor groups in a region, then exit the market in a few years with a sizable profit because they've gutted care (what they call alignment w/ their operational standards), and then go on to sell their clinic to even larger equity firms who do the same once they've made the profits they desire. The US medical system is an embarrassment around the world as it's based on greed, not care.

So, my comment boils down to this. We need universal healthcare in this country. Doctors need to make a good, but not greedy, living as they provide an important function. But so do many other professions (education, food systems, resource use and conservation, etc., including others in healthcare). The salaries and percent profit for hospital and other executives and/or investors is obscene. We need a healthcare system that is focused on care and efficiency, not greed. One that is based on care providers' and patients' rights and responsibilities (educate folks on their personal

responsibility for managing their health). There are many examples of countries around the globe that do this, and, often, the care is better and less expensive.

It's time to try a different approach. Thank you for accepting these comments.

Flaxen D L Conway

99. Subject: Potential purchase of Corvallis Clinic by Optum

Received 1/9/24

We have become aware of the potential purchase of Corvallis Clinic by Optum Health, a division of UnitedHealth Group, the nation's largest health care corporation. According to the Jan 2, 2024 Lund Report, United Health Group is on the path to becoming a monopoly corporation in health care. It is now the single largest employer of physicians in the country, Monopolies often have negative impacts on consumers. It seems an especially bad idea in health care, and we urge the OHCOP to consider public input very seriously on this matter.

We understand that the Oregon Health Care Oversight Program is authorized to approve or deny this purchase and is accepting input from the public until Jan 18. We urge the OHCOP to proceed cautiously and to seriously evaluate other options available to address the financial issues that are facing the Corvallis Clinic. Please ask:

Is this purchase in the best interests of the population of the mid Willamette Valley regarding their general healthcare needs? AND

What are projected changes regarding out of pocket costs of healthcare for patients if this purchase occurs?

We understand that the state of Oregon, through the OHCOP, now has the authority to reject or set conditions on deals such as this. The state can now nix a proposal if it finds the deal would harm health care, or can set conditions and monitor new owners to ensure compliance. We strongly urge the state to deny this purchase, but if the deal does go through, we urge the OHCOP to closely monitor the situation on behalf of all patients and health care consumers in Benton, Linn and Lincoln counties.

Thank you very much,

Patti and Rich Wittrup

100. Subject: Optum proposed merger with Corvallis Clinic - please reject

Received 1/9/24

Dear Sirs,

I write to urge rejection of the acquisition of Corvallis Clinic by Optum Oregon. When I moved to Oregon 22 years ago, one key attraction of the Corvallis area was the presence of a locally owned and comprehensive health care facility, the Corvallis Clinic. During these many years, I have welcomed the many ways in which the Clinic has served our community. I seriously doubt that ownership by a multi-national corporation, based thousands of miles away, with profit as it's main goal, will really benefit the citizens of this area. There are so many examples, across so many industries over the last few decades, of consolidations that really only benefit the shareholders, not

those served by or working for the industry. Please reject this merger as not in the public's best interest.

Philip Coleman

Philomath, OR

101. Subject: Optum/Corvallis Clinic merger

Received 1/9/24

Hello,

I wish to be anonymous as I am currently employed at TCC. I understand the merger must go through or the clinics will close.

The Corvallis Clinic will no longer be the entity that we signed our original contracts with. I ask that current non-shareholder physicians be released from their non-compete clauses. The last 2-3 years of recruitment were done with the company knowing they had significant financial problems. In the last year they recruited more people, with all the same promises, and then sprung the news of the merger. AND they feel holding us to not working with-in a 100-mile radius from any TCC facility is completely fair and we are all bound by it.

This merger and the continued enforcement of the non-compete clause will rid the Willamette Valley, Eugene, Salem and the coastal cities of Primary care that is not controlled by a corporation. Please do not let this happen. Leave us able to stand on our own if we can. Please let the citizens of Oregon have the option to have a non-corporate physician.

With hope,

A TCC physician

102. Subject: Optum buyout of The Corvallis Clinic

Received 1/10/24

Although I am saddened by the fact that the Corvallis clinic needs to be bought out by Opum, I believe I understand the situation more than some. I worked at the Corvallis clinic for 32 years and have been seeing providers there for about 48 years. My understanding is that if the Corvallis Clinic is not purchased by Optum Health, then they will need to close the clinic very soon due to financial issues. (I'm guessing a lot of those issues have to do with the very low reimbursement by Medicare). I'm not sure what the answer to that issue but is but it saddens me that a place like the Corvallis clinic, which has been in the Corvallis area for many years cannot financially make it any longer on their own. But even though it saddens me, my vote would be to LET the merger go through so that we do not have to lose our wonderful providers at the Corvallis Clinic, and that hundreds of employees and 100 Providers will not be out of jobs.

Thank you for listening,

Julia Jenkins

103. Subject: Optum - The Corvallis Clinic and United Health

Received 1/10/24

I am registering my deep concerns about acquisition of The Corvallis Clinic by Optum, United Health.

I've been a patient at The Corvallis Clinic for nearly 50 years. I serve on their Patient and Family Advisory Board. I appreciate getting my care from a doctor owned clinic.

When I read about the acquisition, I began looking for a new doctor. A good friend has already changed.

I've been happy with my service from The Corvallis Clinic. I have been deeply disappointed with my service from United Healthcare insurance. On several occasions, I was brought to tears by: 1- the lack of consistent answers from different agents; 2- the transferring me back and forth ("They take care of this matter" "NO - this other group takes care of that" "NO - you need to go back to the first agent"); 3-the chain of "to reach this, push this #"; and 4-the ultimate failure of anyone being able to assist me.

After years of frustrating mis-communication with UHC, I finally left and now get insurance through Regence.

Corvallis is not a suburb. We do not have the option of traveling to a nearby city for medical care. We need choice among personal, local institutions. Please don't let us fall into what is sure to become de-personalized, systematically complicated, and, finally, poor health care.

Feel free to contact me,

Jodi Altendorf

Corvallis OR

104. Subject: Optum

Received 1/10/24

I am extremely concerned about the news of a subsidiary of United health taking over the corvallis clinic. I include an article from the economist about the impact of increased consolidation in the health care industry. Samaritan (our only hospital) recently refused to contract with United Health Care. Will the new company force people to go to a hospital in Salem or Eugene? We are already hurting for health care. I, personally, have been without a primary care doctor for almost a year because it's so difficult to find someone who is taking new patients.

Who profits most from America's baffling health-care system? Not Big Pharma.

The Economist

Sun, October 8, 2023 at 1:48 PM EDT·9 min read

On October 4, more than 75,000 employees of Kaiser Permanente, a large health-care chain, began a three-day strike. The walkout was the biggest in the history of

America's health sector, and called attention to the staffing shortages plaguing the country's hospitals and clinics.

In the same week, 10 drugmakers said [they would negotiate](#) medicine prices with Medicare, the public health-care system for the elderly, following legislation which all but forced them to. It will be the first time that companies have haggled over prices with the government.

These events are symptoms of the deeper malaise in America's dysfunctional health-care system. The country spends about \$4.3 trillion a year on keeping citizens in good nick. That is equivalent to 17% of GDP, twice as much as the average in other rich economies. And yet American adults live shorter lives and American infants die more often than in similarly affluent places.

Pharmaceutical firms and hospitals attract much of the public ire for the inflated costs. Much less attention is paid to a small number of middlemen who extract far bigger rents from the system's complexity.

Over the past decade, these firms have quietly increased their presence in America's vast health-care industry. They do not make drugs and have not, until recently, treated patients. They are the intermediaries—insurers, pharmacies, drug distributors and pharmacy-benefit managers (PBMs)—sitting between patients and their treatments.

In 2022, the combined revenue of the nine biggest middlemen—call them "Big Health"—equated to around 45% of America's health-care bill, up from 25% in 2013. Big Health accounts for eight of the top 25 companies by revenue in the S&P 500 index of America's leading stocks, compared with four for Big Tech and none for Big Pharma.

<~WRD0002.jpg>

After a person reaches 65 years of age, the average healthcare costs are over \$11,000 per person, per year. (Robert Nickelsberg/Getty Images)

Big Health began as a constellation of oligopolies. Four private health insurers account for 50% of all enrolments. The biggest, UnitedHealth Group ([UNH](#)), made \$324 billion in revenues last year—behind only Walmart ([WMT](#)), Amazon ([AMZN](#)), Apple ([AAPL](#)) and ExxonMobil ([XOM](#))—and \$25 billion in pre-tax profit. Its 151 million customers represent nearly half of all Americans. Its market capitalisation has doubled in the past five years, to \$486 billion, making it America's 12th-most-valuable company.

Four pharmacy giants generate 60% of America's drug-dispensing revenues. The mightiest of them, CVS Health ([CVS](#)), alone made up a quarter of all pharmacy sales. Just three PBMs handled 80% of all prescription claims. And a whopping 92% of all drugs flow through three wholesalers.

With little room left to grow in their core businesses, and trustbusters blocking attempts to buy direct rivals, the oligopolists have in recent years expanded into other bits of the health-care supply chain.

Besides adding to the top line, such vertical integration is also juicing margins. The Affordable Care Act of 2010 limited the profits of health insurers to between 15% and 20% of collected premiums, depending on the size of the health plan. But it imposed no restrictions on what physicians or other intermediaries can earn.

The law created an incentive for insurers to acquire clinics, pharmacies and the like, and to steer customers to them rather than rival providers. The strategy channels revenue from the profit-capped insurance business to uncapped subsidiaries, which in theory could allow insurers to keep more of the premiums paid by patients.

According to Irving Levin Associates, a research firm, between 2013 and August 2023 the nine health-care giants spent around \$325 billion on over 130 mergers and acquisitions. Some of these deals have pushed the firms deeper into each other's turf.

In 2017, CVS offered \$78 billion for Aetna, a large health insurer and a competitor of UnitedHealth's. The following year Cigna ([CI](#)), another big insurer, swallowed Express Scripts, a big PBM, for \$67 billion. In 2022, UnitedHealth paid \$13 billion for Change Healthcare, a data-analytics firm which processes insurance claims for large parts of the industry, including UnitedHealth's rivals.

Both UnitedHealth and CVS have been buying up health-care providers, too. Optum Health, a subsidiary of UnitedHealth, has spent over \$23 billion on such transactions in the past six years, and now treats more than 20 million patients through a network of 2,200 clinics. It has more doctors on its books—70,000 employed or affiliated physicians—than the biggest hospital chains in the country. CVS runs 1,100 or so neighbourhood clinics, and this year alone paid \$18 billion for two companies focused on the lucrative elderly-care market.

<~WRD0002.jpg>

Nurse practitioner takes temperature of patient at a MinuteClinic at CVS drug store, North Brunswick, New Jersey.

Industry executives say that bringing all parts of patient care—primary-care clinics, pharmacy services, PBMs and insurance—under one roof is beneficial for all.

In the old fee-for-service model, Big Health argues, doctors or hospitals are paid for each service they provide, encouraging them to perform as many as possible and charge as much as they can. If doctors and insurance companies are part of the same business, by contrast, incentives should be aligned and overall costs should be lower.

That, at least, is the theory. And there is some truth to it. Despite its recent labour troubles, Kaiser Permanente has historically been hailed as a role model for efficient and high-quality health care. Its business, with 39 hospitals and over 24,000 doctors, is highly integrated, with Kaiser's insurance plans covering members' treatment at its hospitals and clinics. This April, Kaiser announced it would acquire Geisinger Health, a Pennsylvania-based health system, to expand its model of integrated care to more states.

Yet vertical integration can have adverse side-effects. For example, many studies have found that after hospitals acquire physician practices, prices increase but quality of care does not. A health-care company that controls many aspects of patient care could raise prices for rivals wishing to access its network. Some also worry about physicians being nudged towards offering the cheapest treatment to patients, lowering the quality of care.

There is as yet no evidence of trouble with the model, argues Richard Frank of the Brookings Institution, a think-tank. But elsewhere in Big Health, signs of oligopolistic behaviour are already on display.

Consider PBMs. These middlemen are in the crosshairs of lawmakers and regulators for their role in determining drug prices. At least four different bills that seek to regulate PBMs are making their way through Congress. For almost two decades, the Federal Trade Commission (FTC), America's main antitrust agency, pushed back against efforts to increase oversight of PBMs, arguing that such moves would harm consumers. In July 2022, however, the FTC changed tack and launched an investigation into the business practices of the largest PBMS.

At issue is PBMs' opaque pricing, which takes a drug's list price and shaves off discounts that the PBM wrangles from drugmakers.

This content is not available due to your privacy preferences.

PBMs claim that they are a counterweight to Big Pharma. But critics argue that large PBMs don't pass on the discounts to the health plans, instead keeping much of the difference for themselves, and limit access to treatments that are less profitable for them. In August, Blue Cross of California, a regional health insurer, ditched CVS's PBM in favour of smaller firms to save on drug costs for its nearly 5 million members.

Indeed, America's health-care intermediaries are unusually profitable. Research by Neeraj Sood of the University of Southern California and colleagues found that intermediaries in the the health-care supply chain earned annualised excess returns—defined as the difference between their return on invested capital and their weighted average cost of capital—of 5.9% between 2013 and 2018, compared with 3.6% for the S&P 500 as a whole.

Big health's giant pool of excess profits is at last attracting newcomers. Upstart health insurers like Bright Health Group and Oscar Health have positioned themselves as a transparent and consumer-friendly alternative to the old guard. Mark Cuban Cost Plus Drug Company, an online pharmacy started by the eponymous billionaire, bypasses the middlemen by buying cheaper generics directly from manufacturers and selling them to consumers at a fixed 15% mark-up.

Perhaps the biggest disruption to Big Health could come from [Amazon](#). In 2021, its health-care ambitions suffered a setback owing to the closure of Haven Healthcare, a not-for-profit joint venture with JPMorgan Chase, America's biggest bank, and Berkshire Hathaway, its biggest investment firm. Haven had aimed to reduce health-care costs for the three firms' own employees.

But despite Haven's failure, Amazon is still expanding its health-care business. Last year it paid \$3.9 billion for One Medical, a primary-care provider. It also runs Amazon Clinic, an online service offering virtual consultations, and RxPass, which lets members of its Prime subscription service buy unlimited generic medications for a small fee. John Love, who heads Amazon's pharmacy business, believes that the tech giant's focus on customer experience, combined with its vast logistics network, makes it well-suited to shake up the industry.

<~WRD0002.jpg>

A One Medical office in Oakland, California. (Justin Sullivan/Getty Images)

So far the newcomers' impact has been muted. Lisa Gill of JPMorgan Chase reckons that most of them underestimate the complexity of the business of health. The entrenched firms have built their networks of doctors, hospitals, insurers and drugmakers over decades. Replicating that takes time and institutional knowledge.

Mr Cuban admits that it is difficult to get drugmakers to list branded drugs on his pharmacy, as they are wary of upsetting the large PBMs. And without branded drugs and the support of large health insurers, his firm's reach remains small.

The cap on insurers' profits makes life tough for upstarts in that business, who struggle to compete against the negotiating power of the integrated giants. Even Haven, which represented its three backers' 1.2 million American employees, did not command enough market power to compel lower prices from health-care providers.

Amazon's pharmacy business has yet to break into America's top 15 pharmacy chains. Big Tech may be powerful. But for now even it bows before Big Health.

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Hollis Fishelson-Holstine

105. Subject: Re: proposed merger of The Corvallis Clinic and Optum

Received 1/10/24

Dear Health Care Market Oversight Program,

The proposed merger of HCMO, or Optum, and the Corvallis Clinic looks like a move to save the Clinic from declining revenue and/or some other way of saving some of their programs. A large metropolitan organization like HCMO, or Optum, is not likely to be as answerable to the local clients.

Denis White

106. Subject: Re:Optum

Received 1/10/24

Hello,

I would like to make my voice be heard on the buying of the Corvallis Clinic by UHC (Optum). I am not in favor of this transition because I have dealt with insurance companies for years and it's hard and a drawn out process to get money out of them and I've also talked to some of their members and their opinion is the same. They don't seem to get anywhere when calling to get explanations or help. I don't think a small area like Thanks for your time,

Darlene Davis

107. Subject: Optum

Received 1/10/24

Dear Administrators –

It is with great concern that I read about Optum's proposed take over of Corvallis Clinic. To go from a physician-owned medical clinic (where I see one specialist) to a national "franchise" as if it were a Walmart - no, that's wrong! There has to be a point at which we realize our healthcare has been compromised by these profit-seeking corporations!

I have recently lost my affordable PPO health insurance when Samaritan medical corporation cut their association with AARP/United Healthcare, leaving Linn County residents with very few options, including (amazing coincidence!

https://s.yimg.com/nq/yemoji_assets/latest/yemoji_assets/1f644.png) Samaritan Insurance. Now we will have a spinoff of United taking over the last local medical group?? PLEASE do not allow it! If Corvallis Clinic needs help, then subsidize or in some way support this more local, more responsive medical option!

Very soon we will have only McMedical clinics and no actual healthcare at all!

Catherine McGuire

Sweet Home, OR

108. Subject: Optum

Received 1/10/24

Dear Oregon Health Authority,

In an effort keep our health care system local & doctor-owned, I urge you to reject the acquisition of the Corvallis Clinic by Optum Oregon (Minnesota based United Health Group).

Thank you for your strong opposition to this proposal,

Sincerely,

Pam Thomas

109. Subject: Optum buyout of the Corvallis Clinic

Received 1/10/24

We are adamantly opposed to the sale of the Corvallis Clinic to Optum. We understand that the Corvallis Clinic is having serious financial difficulties, but selling out to Optum is not the solution. This deal will not benefit the medical providers and staff who work there, and it will

certainly not benefit the patients who need care from the Clinic. Optum's business practices make their profit a higher priority than serving patients. This deal will only benefit their CEO and their shareholders. The doctors at the Clinic will no longer be owners with a stake in the business, they will become overworked and underpaid employees. Don't believe Optum's empty promises that they will improve care and streamline the paperwork.

Optum has already bought the Oregon Medical Group in Eugene and the medical clinic in Everett, Washington. Since Optum acquired these companies, numerous complaints about them have been submitted to the Better Business Bureaus in these cities. Billing problems and difficulties in getting appointments are the most common complaints. Complaints allege that they routinely make serious mistakes in billing. When insurance doesn't pay them because of their mistakes, they send the bills to debt collectors. Trying to get the errors corrected goes nowhere, in spite of many phone calls and emails, creating havoc for the patient, and making their life a living nightmare. In contrast, of January 10, 2023, there are no complaints about the Corvallis Clinic submitted to the Better Business Bureau.

There is usually an exodus of doctors after Optum takes over a medical practice. This results in a shortage of providers, which makes it difficult to get appointments in a timely fashion. One person in Eugene had to wait seven months for an appointment, and they canceled her appointment the day before because of a shortage of staff, then told her she would have to wait another seven months to get another appointment.

These problems with Optum aren't limited to Washington and Oregon. The Examiner News, a paper in Westchester County, New York, has written several articles detailing the numerous problems at CareMount Medical, a clinic that was taken over by Optum in that county. The December 11, 2023 article confirmed that a significant number of providers left, resulting in a shortage of doctors. Optum also changed their scheduling practices and required that all time slots for appointments had to be filled for several days in advance. As a result of this policy, combined with the doctor shortage, it became impossible for patients to get an appointment for an acute health problem in a short amount of time. Problems that could have been addressed in a primary care physician's office had to be treated in an urgent care or emergency room. This put a strain on the local urgent care and emergency rooms.

From the December 11, 2023 Examiner News:

"We used to be able to reserve several office visit openings a day for those that call in the morning who need a sick visit," my doctor source said. "Optum did away with this availability to be sure every single time slot possible was booked up to several days in advance, thus ensuring maximum patient visits for max profits."

In order to prevent medical providers from leaving CareMount, the Examiner News, January 15, 2023, reported on the onerous "non-compete" contract that doctors were forced to sign. The Examiner News wrote, "It stipulates that doctors (if they resign) are barred from practicing medicine within a 20-mile radius of their primary office location for three years. By extension, if you think about it, Optum is barring area patients from receiving care from their trusted local doctors, after a resignation, for three full years, and usually forever as a practical matter."

The contract stated: "In the event of a termination of this agreement, senior associate agrees that senior associate shall not, within the service area...of the corporation and for a period of three years following termination of this agreement, engage, directly or indirectly, as principal, owner,

partner agent or employee, in the practice of medicine except as a salaried physician of an institution such as a hospital, university or public health facility, but only in administrative capacity which does not include any rendering or direct supervision of medical services,” asserts the employment contract obtained by The Examiner News.

If Optum is allowed to take over the Corvallis Clinic, costs will increase and patient care will decline. They haven't improved care, administration or working conditions at any of the medical facilities they have bought out. Don't believe their empty promises. Please don't let them degrade care at the Corvallis Clinic.

Wayne Sugai and Barbara Ellis-Sugai

Corvallis, Oregon

110. Subject: OPTUM

Received 1/10/24

This pertains to the proposed acquisition of the Corvallis Clinic by Optum; we have used this clinic since 1988 and have watched it struggle in recent years to both retain doctors and provide care in a timely manner. The primary concern that we have with this proposed purchase is that our Medicare original and Medicare supplement plan (MODA) continue to be accepted. The push in recent years to drive us to buy Medicare Advantage plans so that the Clinic could recover more \$\$ was not in our best interest. The Clinic did agree that those long-term patients would continue to have full access to the clinic doctors with our current insurance combination.

We request that some guarantee be built into this acquisition to not shut out original medicare patients with supplemental plans. We don't want to change from original medicare and we don't want to change our supplemental plan as it provides superior coverage for illness and hospitalization.

I realize that Samaritan dropped the United Health patients last year for questionable reasons; I do not want to see Optimum try to strong arm current clinic patients (regardless of their insurance) to change to United Health!!!!

Please be sensitive to consumer needs. If a merger is to happen, please try to craft this acquisition into something that allows a patient to still have doctors both at Samaritan as well as the Clinic. We currently do (Kidney specialist at Samaritan) and find the on-going frustration of two separate systems to be difficult to navigate but we can make it work; Samaritan and the Corvallis Clinict have NOT been cross-supportive of each other despite what each would claim. Given what Samaritan did last year, the situation might get significantly worse for the Clinic patients since we tend to get lost in the war between corporate entities.

Thank you.

Stella and Jim Coakley

Corvallis, OR

111. Subject: Optum

Received 1/11/24

A question from a patient about Optum, United Health Care, buying The Corvallis Clinic:

Will long-term patients at The Corvallis Clinic be allowed to keep their current insurance, for example, Original Medicare with a Moda Health Medicare supplement as provided through the PERS health insurance program? Or will they eventually be required to change to a different plan of Optum's choice, for example, a Medicare Advantage plan?

For some people a Medicare Advantage plan is fine. For others Original Medicare has clear advantages.

112. Subject: OPTUM

Received 1/11/24

OHA

Healthcare Market Oversight

Greetings:

I'm a 73 year old male living in Lebanon. My background is 40 years as a registered nuclear medicine technologist (10 years as reg. nuclear cardiology tech). I see a specialist at the Corvallis Clinic on a regular basis and I'm otherwise in good health. My insurance is Medicare with a supplement plan.

My reason for writing and commenting is the proposed buyout of The Corvallis Clinic by private equity firm, OPTUM Oregon. My concerns are several, first of which is that OPTUM is reported to be a subsidiary of UnitedHealth Group. UnitedHealth is also an insurance provider with a large stake in insuring seniors under Medicare Advantage.

These plans are rife with documented incidents of patient denials of treatment, medical care and choice of provider. There's a better than even chance that once OPTUM acquires The Corvallis Clinic they would opt out of serving Medicare patients entirely and recommend that patients like me switch to a Medicare Advantage plan such as the one offered by UnitedHealth and that would be unacceptable to me.

Not only would this acquisition potentially be unacceptable by forcing patients out of traditional Medicare, it would also be likely to lead to higher patient costs and a lower quality of care and there's no evidence that physicians or other healthcare providers will share in the additional revenue once prices are raised for patients.

In summary this acquisition by OPTUS of the Corvallis Clinic is a lose, lose, lose for patient care, patient costs and provider salaries. Supporting excerpts and links to articles below.

Thank you for taking time to consider my points against approval of this acquisition.

Michael Phelan

Lebanon OR

[Forcing People Out of Traditional Medicare and into Medicare Advantage.](#)

Bill Haskell | July 10, 2021 12:23 pm

[HEALTHCARE](#)

[HOT TOPICS](#)

[POLITICS](#)

[TAXES/REGULATION](#)

This was always the plan? The plan did not include forcing people out of traditional Medicare and into Medicare Advantage.

(Washington, DC) — The following is a statement from Nancy Altman, President of Social Security Works, on the [Medicare executive order](#) Donald Trump is signed today:

“Medicare Advantage is a hustle designed to allow for-profit corporations to suck up public dollars. For years, Republicans have shoveled money into Medicare Advantage plans and [allowed them](#) to offer benefits that traditional Medicare is forbidden from covering. This is a ploy to push seniors into Medicare Advantage plans instead of traditional Medicare. Medicare Advantage is stealth privatization intended to undermine traditional Medicare, which is an effective, popular government program and therefore loathed by Republican ideologues.

<https://angrybearblog.com/2021/07/forcing-people-out-of-traditional-medicare-and-into-medicare-advantage>

Older Americans say they feel trapped in Medicare Advantage plans

JANUARY 3, 2024 2:21 PM ET

HEARD ON [ALL THINGS CONSIDERED](#)

FROM

By

Sarah Jane Tribble

“ David Meyers, assistant professor of health services, policy and practice at the Brown University School of Public Health, analyzed a decade of Medicare Advantage enrollment and found that [about 50% of beneficiaries](#) — rural and urban — left their contract by the end of five years.

The problem is that once you get into Medicare Advantage, if you have a couple of chronic conditions and you want to leave Medicare Advantage, even if Medicare Advantage isn't meeting your needs, you might not have any ability to switch back to traditional Medicare,” Meyers says.

Traditional Medicare can be too expensive for beneficiaries switching back from Medicare Advantage, he says.” But there's there's a catch: While beneficiaries who enrolled first in traditional Medicare are guaranteed to qualify for a Medigap

policy without pricing based on their medical history, Medigap insurers can deny coverage to beneficiaries transferring from Medicare Advantage plans or can base their prices on medical underwriting.”

<https://www.npr.org/sections/health-shots/2024/01/03/1222561870/older-americans-say-they-feel-trapped-in-medicare-advantage-plans>

Berkeley Public Health

New report exposes breadth of physician practices owned by private equity

The practice leads to higher consumer prices

July 10, 2023

“The American Antitrust Institute (AAI), in collaboration with the University of California at Berkeley (UCB) Petris Center on Health Care Markets and Consumer Welfare, and the Washington Center for Equitable Growth (Equitable Growth), announced the release of a new report on private equity ownership in healthcare.

Lead author on the report, Professor Richard Scheffler, Distinguished Professor of Health Economics and Public Policy, and Director of the Petris Center at UCB, noted “This report provides convincing evidence that incentives to put profits before patients have grown stronger with an increase in private equity ownership of physician practices. This will fundamentally change the way medicine is practiced.”

The policy implications surrounding the report’s analysis of private equity ownership of physician practices are significant. Report co-author, Laura Alexander, Director of Markets and Competition Policy at Equitable Growth explained: “Our findings underline the vast implications that rapid, stealth consolidation of physician markets by private equity funds have had for competition, patients, and anyone who pays for healthcare practices. It’s clear that there is a need for attention and action from competition enforcers and policymakers to address these accelerating acquisitions.”

The report clearly frames a set of immediate policy steps that would strengthen competition enforcement and healthcare policy in physician practice markets. For example, reporting and scrutiny of small healthcare provider acquisitions, particularly by private equity funds. Key adjustments to the Hart Scott Rodino (HSR) Act reporting requirements would support stronger antitrust enforcement. Mandatory reporting to increase transparency of ownership of physician practices is also critical. Other policy implications include closing regulatory loopholes that distort competition in healthcare and expanding liability to private equity funds for misconduct by portfolio companies.

Finally, the analysis in the report should draw needed attention to lowering barriers to entry in concentrated physician markets and developing additional funding sources for capital investments. Diana Moss, President of AAI, noted “The report makes clear that physicians need more options for restructuring their practices so they can continue to do what they do best—practice medicine. Selling out to private equity or other large corporate entities shouldn’t be the only options on the table.””

<https://publichealth.berkeley.edu/news-media/research-highlights/new-report-exposes-breadth-of-physician-practices-owned-by-private-equity/>

The Harvard Gazette

Care riskier for patients at private equity hospitals

Study finds alarming decline in quality, safety measures after buyouts

HMS Communications

January 2, 2024

After a hospital was acquired by private equity, Medicare patients had a 25 percent increase in complications.

The [research](#), published Dec. 26 in JAMA, is among a handful of recent nationwide analyses of how private equity takeovers affect the quality of patient care in hospitals. The increases in patient complications are from conditions or outcomes deemed preventable and are key measures of hospital safety and quality.

The findings come amid growing concerns about private equity's increasing role in U.S. healthcare, with [\\$1 trillion invested in the past decade](#).

"We had previously found that private equity acquisitions led to higher charges, prices, and societal spending," said [Zirui Song](#), associate professor of health care policy and medicine in the Blavatnik Institute and director of research in the Center for Primary Care at the Medical School. "Now, we're learning that there are also downstream concerns for the clinical quality of care delivered to hospital patients."

The researchers said the findings are alarming because they may reflect bottom-line incentives overshadowing patient care and safety.

"Hospital success is measured not only in dollars or the number of patients who pass through the doors, but also in lives saved, complication rates, patient satisfaction, and a number of other quality and safety metrics," said research fellow [Sneha Kannan](#), a physician in the Division of Pulmonary and Critical Care at Massachusetts General Hospital. "We need to make sure we fully understand the costs and benefits of this prominent new force in healthcare."

<https://news.harvard.edu/gazette/story/2024/01/healthcare-riskier-for-patients-at-private-equity-hospitals/>

AMA

Physicians warned of the pitfalls behind private equity promises

AUG 1, 2022 . 5 MIN READ

By

[Andis Robeznieks](#), Senior News Writer

Their key finding, however, was that prices rose 26% with private equity-backed PMCs, while prices at such companies without private equity investment grew by 12.9%.

“The takeaway here is unfortunately bad for patients because these higher prices get passed on to them directly in the form of higher out-of-pocket cost, as well as eventually in the form of higher insurance premiums,” said La Forgia, an assistant professor of management at the University of California at Berkeley Haas School of Business.

The impact on physicians is unclear because PMCs’ salaried doctors may not be sharing in this growing revenue, La Forgia said, noting that the money derived from the price increases is “probably going into acquiring further practices” rather than benefiting physicians.

<https://www.ama-assn.org/practice-management/private-practices/physicians-warned-pitfalls-behind-private-equity-promises>

113. Subject: re: Corvallis Clinic purchase by Optum - opposed.

Received 1/11/24

Hello,

This is in response to OHA's request for public comments regarding the acquisition by Optum corporation, a private equity firm, of the Corvallis Clinic, a privately owned physician's clinic in Corvallis, Oregon.

I am very opposed to the purchase. I know that the physician's at the CC feel squeezed and are not realizing the profits they'd like to realize in the face of market forces and pressures that face all healthcare facilities these days.

I also know that the purchase is likely a done deal. Regardless, I am writing this letter to serve as part of the record on the right side of history in the fight against these perverse incentives, where healthcare for Americans by bad actors is seen as a money making venture rather than delivering health care and improving the health of the country, a person at a time.

While the data is not yet in on the health outcomes of outpatient groups purchased by private equity such as OPTUM, here is an [article](#) from the NYT (12/26/23) about the negative health outcomes (38% increase in central line infections, 27 % increased patient falls, for e.g.) in hospitals after they were purchased by private equity firms.

I am intimately acquainted with the healthcare system and the health insurance industry from different perspectives - as a consumer, a patient, a former discharge planner/utilization reviewer/oncology social worker, as a health care researcher, college instructor, and provider, I've worked with and have an excellent knowledge of major insurers and how they work, both public and private - to name a few, Regence, Moda, Medicare/Medicaid here and in other states, Pacific Source, Samaritan, Providence, United..... These are health insurance companies that have their issues but their mission is to deliver health care and administer health insurance. EXCEPT for the latter, United, which, by me and others, is considered a bad actor in the game.... And is a subsidiary of Optum.

Why does United healthcare SUCK for consumers and patients alike? Why won't I and other mental health providers take United health care? Because they pay an insultingly low reimbursement rate for mental health, they deny coverage, their mental health carve out "solution" is a time-sucking admin nightmare to maneuver for patients and consumers, of all the health insurers I've dealt with over the years, UNITED HC stands out as the WORST, on a par with TRIWEST, which sadly serves veterans in a terrible manners such that they dont get served, kind of like United.

From an oncology perspective, you would not want your grandmother to have UHC and need certain oncology procedures - if she did, she might be told by her doctor, like doctors I worked with, to use older cheaper procedures rather than current guidelines in order to save \$\$\$. Whenever I am asked to weigh in on health insurance choices, I say, NOT United. Anecdotal info from friends and colleagues support my views.

Here is a [little ditty](#) from Becker's bis report on OPTUM, which started only in 2011 and now makes 30% profits year over year. How are they realizing those profits? By cutting staff, upcoding, among other schemes.

Three reasons the health insurance market differs from other economic markets and should not be treated as such:

1. Asymmetry of information (you can learn all about a pear variety, a car before you buy, but as a consumer, you have to for the most part, rely on the provider to tell you the right test - do i need an MRI or xray?
2. the laws of supply and demand do not apply.
3. lack of price transparency for comparison shopping. "Oh - this ortho charges \$3000 for a total knee. This other one charges \$4000. Let me compare them and see what I am getting so I can make an informed decision about which surgeon I want to repair one of my two very precious knees". That is what a fair economic market looks like.

Thank you for your time, and for entering my objections to the purchase of the CC by Optum...

Sincerely, Jean Schumer

--

Jean E. Schumer, LCSW, PhD, LLC

Website: www.jeaneschumer.com

Corvallis, OR

114. Subject: optum merger

Received 1/11/24

A merger of the doctor owned The Corvallis Clinic to a private insurance provider-United Healthcare/Optum (recently booted by Samaritan Health for poor performance) ?

Just.....NO!!!

Julianna Burke

115. Subject: Corvallis Clinic Acquisition

Received 1/12/24

I am writing in regards to the possible acquisition of Corvallis Clinic by Optum which I understand has a financial relationship with United Healthcare.

Prior to my retirement I worked in healthcare for 35 years. I worked as a Case Manager/Patient Care Coordinator for 31 years in our local Samaritan Hospitals and spent the last four years of my career as a Clinical Documentation Improvement Nurse with Samaritan Health Services. As a Case Manager I worked with insurance companies to coordinate post discharge plans and to obtain authorization for various post hospital care services. As a Clinical Documentation Improvement nurse I worked with physicians concurrently on their documentation for hospitalized patients in order for their hospital care to be coded correctly. Working in these two positions gave me the opportunity to work closely with insurances in obtaining authorizations and seeing the denials that came through for a patient's hospitalization.

I do not think it is in the best interest of the Corvallis community to have Optum/United Healthcare, a publicly traded company, oversee the healthcare of the Corvallis Clinic patients. I see this as a conflict of interest with United Healthcare having stockholders. Who do they support, their stockholders who expect to have earnings from their stock holdings, the physicians who have a relationship with the patient and know what is in the best interest for their care or the patients. I know healthcare costs have risen astronomically in the last several years and it is important to look at ways that can control those costs. However I do not think the purchase of the Corvallis Clinic by a public traded company is in the best interest of the patients.

If this process moves forward I would request the HCMO do a comprehensive review of what Optum plans to do to ensure that patients are receiving quality care and the focus is on what is best for the patients.

Thank you for taking my comments into consideration as you look at the acquisition of Corvallis Clinic by Optum.

Nancy Erwin

116. Subject: Opposing purchase of the Corvallis clinic by Optum

Received 1/12/24

Hello,

To protect Oregonians from the massive corporate takeover of health care I strongly oppose the purchase of the Corvallis clinic by Optum.

As the corporate monopoly dominates more and more of health care in many areas we are all losing the ability to have choices about our medical care due to the giant monopoly of United Health care and others. Costs go up and rejection by insurance companies of medical needs required by doctors for patients continues at an alarming rate!

Please appoint a local community review board on the issue. That needs to be conducted before any final decision is made.

Thank you.

2/6/2024

Carolyn Hinds

Alsea, Oregon

117. Subject: optum

Received 1/12/24

my comment regarding action of Optum trying to buy Corvallis Clinic.

I have several concerns. As a patient at Corvallis Clinic for 6y ears, I hope to stay there for the remainder of my time on earth. I am very worried when a company that is so closely related to a Health insurance business wants to buy a medical practice. Will they only accept their insurance? As Classic medicare members, with Part B through Moda, not United Health care, we are very worried.

as well, I am not comfortable with this whole United Health fiasco caused by Samaritan Health kicking out United Health care. Will this then create a rivalry between Clinic doctors and Samaritan Health doctors? Does United Health care want to gian a foothold into the Clinic as retaliation for no longer having acceptance at Samaritan Health? I do not know all the details of course, nor do I begin to understand the insurance industry in this country. But the whole situation seems fraught with major conflicts of interest, and major problems for the patients. Heath care is already enough of a problem in USA. I feel like this merger would create morel

Respectfully submitted:

Karin Krakauer

118. Subject: Optum and Corvallis Clinic

Received 1/12/24

My wife and are on Medicare through Samaritan Advantage and have been patients of Corvallis Clinic for over 25 years. We are concerned about the buyout by Optum/United Healthcare. We understand they may raise prices and decrease care. Further, the Samaritan Hospital System that we also use, does not accept United Healthcare due to non-payment, a foreboding omen for future patients and a message that we may have to switch providers away from the Corvallis Clinic, never a fun option.

Thank you

John and Laurie Martin

119. Subject: UHC/Optum takeover of Corvallis Clinic comments

Received 1/12/24

I am writing to comment on the proposed takeover of the Corvallis Clinic by United Health Care via its subsidiary Optum.

I understand Corvallis Clinic is under financial hardship. I don't know the solution to that. I have been a patient of the Corvallis Clinic for about 50 years. One of the reasons I have stayed with them is that they are locally owned and locally controlled. The physicians who own the clinic make the decisions. This is a good thing for patients.

I have severe reservations about Optum/United Healthcare taking ownership. Besides losing local control, I do not think this organization has the best interests of patients as a core value.

The CEO earns over \$20 million/year. That is an absurd salary for someone to manage a local physician group.

Both United Healthcare and Optum separately have been sued in class action lawsuits. The general reason for the suits appears to be that UHC/Optum value profit far ahead of patient care. I cannot think of anything worse for the patients of the Corvallis Clinic.

<https://sourceonhealthcare.org/united-health-subsiary-optum-sued-for-anticompetitive-practices-in-federal-lawsuit/>

<https://www.medicaleconomics.com/view/unitedhealthcare-used-ai-to-deny-patients-health-insurance-coverage-lawsuit-says>

I am opposed to United Healthcare and/or Optum taking over the Corvallis Clinic.

Please deny this transaction. It is bad for patients.

David Derlacki

Corvallis OR

120. Subject: Optum acquisition of The Corvallis Clinic

Received 1/12/24

I am writing to express my serious concerns about the proposed acquisition of the Corvallis Clinic. Here is what worries me most:

- United Health Care has not shown itself to be an honorable partner in paying its bills in its local Advantage Plans. Why should I trust them?
- If Optum says it is going to do a better job of streamlining the care and cost processes, how can we believe them if UHC cannot pay its bills on time?
- Optum wants to make money for its shareholders. Where will that money come from? Denied services to patients? Denials of care? Squeezing the paychecks of physicians so that they either leave the area or are embittered? Deliberate slowing down of payments so the money stays in their hands longer? Refusing to invest in newer technologies?
- I haven't heard anything about how Optum has performed in other regions of the country. What is its track record? Are patients and physicians happy with it?

Thanks for considering these concerns.

Sarah Karr

Patient at the Corvallis Clinic for over 40 years

121. Subject: Optum Health takeover of Oregon

Received 1/12/24

Dear Oregon Health Authority,

2/6/2024

I am writing to ask that you not approve the takeover of the Corvallis Clinic by Optum Health and UnitedHealth. As you know, they are currently seeking more health care practices to subsume under their umbrella after taking over two others recently. After devouring the Corvallis Clinic, I imagine they will search for other practices to consume.

I am strongly opposed to the takeover of every aspect of our lives by corporations. I certainly don't trust them and their shareholders to make decisions that will prioritize quality healthcare over their profits. Not only do they pose a threat to my healthcare, they have also proven to pose threats to independent pharmacies. I currently use the independent Rices Pharmacy where I have been extremely happy with the service they have provided me. I would hate to see them run out of business.

As you probably know, out-of-state corporations cause ~ .80 of every dollar to leave the state. By capitulating to them, we are setting ourselves up not only for poorer health care, but for seeing the majority of every healthcare dollar slip away.

I understand that the Corvallis Clinic has been experiencing financial shortfalls brought about by COVID-19. Rather than sell the clinic off to a corporation whose principal endeavor is to amass as much money as possible, I would like to see the state help them to succeed financially (with state money) until they can recover from the economic shocks delivered by COVID-19. If their current situation has been exacerbated by mismanagement of money on the part of the business side of the Corvallis Clinic, I would like the state to audit and require an overhaul of the clinic administration as a condition of its financial assistance.

These medical clinics are OURS, and do not belong to a corporation. If Optum Health succeeds in assuming the reins of the Corvallis Clinic, I can assure you that I will cease to be a patient there. I hope your decision will be to maintain Oregon state sovereignty when it comes to our healthcare and not allow us to become the playground of those for whom actual healthcare will always come second.

Thank you for your consideration of this email and of this incredibly important issue. The identity and well-being of this state lies in your hands. I hope you will choose to keep Oregon for Oregonians.

Sincerely,

Kirsten Davis

Philomath, OR

122. Subject: Optum opposition to buy out of Corvallis Clinic

Received 1/12/24

We are adamantly opposed to the sale of the Corvallis Clinic to Optum, a subsidiary of United Healthcare. United Health care has shown it's true colors over and over again as evidenced by the numerous lawsuits against them, by numerous points made by other commenters (such as retired and current healthcare personnel Bruce Thomson, Md and Jeff Sharman, MD) about Optum's (lack of) business ethics and their profit before patient model, and by the necessity of our regional hospital (GSRMC) having to discontinue contracts with them due to poor repayment and other issues. Have you also noticed that current Corvallis Clinic staff are conspicuously not commenting? Don't you wonder why? The several medical personnel who I have spoken to at C.C. have

expressed dire concerns over this takeover and what it will mean for the clinic, the quality of care that can be delivered to patients, and for their personal and professional autonomy and job satisfaction. The providers at C.C. likely realize that they cannot speak out against Optum, as their future employer, since Optum has shown in the past how vindictive and cutthroat that they can be to those that oppose them. I suspect there is a high chance of naysayers losing their positions at the clinic if they are brave enough to speak out and publicly oppose Optum as their future employer.

We do understand that the Corvallis Clinic is having serious financial difficulties, but selling out to United/Optum is not the solution. Other solutions need to be sought urgently to support the clinic in a way that maximizes provider control and quality of patient care in conjunction with making the clinic fiscally stable and viable again. This proposed deal with United/Optum will not meet these objectives. It will not benefit the medical providers and staff who work there, and it will certainly not benefit the patients who need care from the Clinic. The doctors at the Clinic will no longer be owners with a stake in the business, they will become overworked and underpaid employees. This deal will only benefit Optum's CEO and their shareholders. Take a look at the comments by David Hart, MD about the number of high level Optum/United Health care executives making salaries over \$10,000,000. Do you think that United/Optum's focus is likely quality patient care, provider satisfaction, or community healthcare, OR is it profit, greed, and monopolizing and controlling the healthcare market?

<https://www.beckerspayer.com/payer/unitedhealth-groups-5-highest-paid-executives.html>

If Optum is allowed to take over the Corvallis Clinic, I have very little doubt that many good physicians will leave, other providers will be locked into non-compete clauses once they sign on, medical costs will increase, and patient care and patient access will decline in many ways. United/Optum takeovers haven't improved care, administration, or working conditions at any of the medical facilities they have taken over. If you can show me an instance of Optum benefiting patients and the community with a takeover, I would like to see it. I would also like to hear just one of my own patients tell me something good about United Healthcare vs the litany of complaints they have with United.

I agree with another commenter that it is not only ridiculous but truly unethical that United/Optum is allowed throughout many states to be both an insurance provider and owner/administrator of the very healthcare facilities/providers which they are insuring. It places all of the healthcare decisions in their own hands and takes away from providers being in charge of the decisions relating to your healthcare. Is this what we want? Is this what makes for quality healthcare?

Let's not let United/Optum take over our local provider-owned clinic, hijack these local healthcare facilities to gain further control of our local and state healthcare market, and continue to become an even larger healthcare behemoth that dominates healthcare in our state and our country. United/Optum taking over C.C. is NOT good for our community. Access to healthcare and quality of services and providers will almost certainly decline if we allow this to happen.

--

Jill and Tom Popowski, Corvallis, OR

123. Subject: Optum

Received 1/13/24

To the Oregon Health Authority,

I write because of my great concern about the proposed purchase of the Corvallis Clinic by the Optum subsidiary of United Health Care insurance company. I have received nearly all of my health care at the Corvallis Clinic since 1994. My primary doctor is superb, and most of the care I have received at the Clinic has been timely and first rate. I am aware that there have been increasing financial difficulties in attracting some specialists to newly vacant positions because the Clinic is unable to offer salaries demanded by M.D. candidates, for example in dermatology and ophthalmology. I have no confidence whatsoever, however, that the huge, for-profit insurance conglomerate of United Health Care will choose to provide needed services by local doctors with efficiency and affordable costs for local residents.

Optum says that it will standardize practice with their other Oregon holdings (The Oregon Medical Group in Eugene and the GreenField Health clinics in Portland) in a vertically integrated model. I fear that this will mean that I will no longer be able to rely on health care in Corvallis alone, but will have to drive to Eugene or Portland for even routine services.

Optum says that it will upgrade software and standardize "workflows", which sounds ominous. I have read an account of the Eugene group's having been closed in the afternoons for four months while medical staff learned the Optum system.

Samaritan Health Services in Corvallis is abandoning its in-network contracts with United Health Care because of the slowness, inefficiency, and high costs of working with the corporation. This bodes ill for patients, staff, and physicians at the Corvallis Clinic.

The Oregon State Constitution now guarantees access to affordable healthcare for all Oregon residents, and the OHA aims to reduce health care costs, including insurance costs. If OHA approves the Optum purchase of the Corvallis Clinic, OHA must set performance conditions and monitor Optum to make sure that the Clinic remains non-profit while providing affordable health care from professional doctors, among them highly qualified MDs.

Yours sincerely,

(Mrs.) Mary Jo Nye

Mary Jo Nye

Corvallis, OR

124. Subject: OPTUM -- Oppose acquisition of Corvallis Clinic

Received 1/13/24

Please prevent further consolidation of the health care "market" in Oregon. At one time I had good insurance through Pacificare. When they were acquired by United Healthcare they immediately began denying my claims for lifesaving treatments for metastatic melanoma. I changed insurance companies at the first opportunity, hence I am here to object to increasing their influence on local health care. I believe they are a predatory entity, and ceding additional medical powers to them is not in the public interest.

Additionally, I believe it is incumbent on you to help stop the alarming trend private equity firms taking away local control of health care. These firms are solely profit driven, intending to shortly sell to even bigger private equity firms, repeating the cycle -- like a ratchet -- where profit is traded for quality.

Thanks for taking this statement into account while making your decision -- may it be in the public interest!

Cheers --Wes

Wes Messinger

Albany OR

125. Subject: Healthcare consolidation

Received 1/13/24

I have real issues with the the proposed acquisition of the Corvallis Physicians Group by United Healthcare. More consolidation is leading to adverse options for patients and lower quality of care.

The self-dealing United engages in should be illegal, but their lobbying has given them the opportunity to continue their growing monopoly. This needs to be stopped..

Tracy Thompson

126. Subject: Optum

Received 1/13/24

Hello,

Please consider the rights of Oregonians in their ability to access healthcare over the profits of out of state corporations.

Thank you,

Karen Anita Cradler

127. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/14/24

Please consider the other options Optum has to enter a competitive marketplace in the mid Willamette Valley.

They have no need to purchase Corvallis Clinic unless they're attempting to stifle competition and have the ability to manipulate the market to suit their corporate profitability.

Please actually serve the people of the mid Valley and insist Optum begin and build their own business presence rather than purchase the long stable, Dr owned practice that should be allowed to continue independently.

If Optum out competes Corvallis Clinic then so be it. Give the locals the chance to vote by taking their business where they chose.

Thank you,

Margaret Adhmore

128. Subject: Recommend disapproval of Optum merger with Corvallis Clinic

Received 1/14/24

Hello OHA,

Our family have been patients at the Corvallis Clinic for over 30 years and have received excellent care from their providers. We oppose the proposed merger of Corvallis Clinic with the United Health Care subsidiary called Optum. This proposed merger would be a step in the degradation of health care in Oregon. It would inevitably degrade the quality of care delivered, and would channel revenues from our community to UHC corporate shareholders elsewhere. The proposed merger would move health care in our community in a direction opposite to that put into law by Oregon voters in Measure 111 (2022). My family and I recommend disapproval of the proposed merger, and instead recommend establishing a joint public-private fund to assist the Corvallis Clinic in solidifying its finances and maintaining local control for the long term.

Thank you for your attention. Sincerely,

Parker Swanson

Corvallis, OR

129. Subject: Optum

Received 1/14/24

As all businesses seem to be moving towards ownership by corporations with mostly great success for the corporate pocketbooks, less success for the employees, and much less success for customers. I urge you to keep Corvallis Clinic independent. A buyout will only help UHG.

Thanks,

David Lee

Corvallis Clinic patient

Corvallis resident

130. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/14/24

To: Health Care Market Oversight

From: Lou Sinniger

Date: January 14, 2024

Subj: OPTUM/UNITED HEALTHCARE BUYOUT OF CORVALLIS CLINIC

Dear Oversight Board:

Thank you for this opportunity to make public comment.

I live in Elmira outside of Eugene Oregon in Lane County. We are still reeling from the closure of the University District Hospital leaving Eugene without emergency services.

While OHA and the Governor could not do anything about Peace Health's decision to close claiming a lack of income, it is my understanding from new legislative action OHA/HCMO will have decision authority over proposed acquisitions and mergers. Several have been proposed over this last year.

The standard talking point is that bigger is better. However, in my lived experience I have usually found that smaller is more personal and attentive especially when personal healthcare is involved.

How can you make a decision based on promises? Well in this case you have some ability to check the record. OPTUM bought Oregon Medical Group in 2022. OMG had a number of clinics and about 100 doctors at the time. Corvallis Clinic has 11 clinics and about the same number of Doctors.

I have heard that patients and providers are not happy with the new OPTUM/OMG. One Physician's Assistant that I go to was so happy to find another clinic to work at after a year of not being able to attend to people in a manner of their choosing, after the buyout.

I submit that the OHA/HCMO research the quality of service at OPTUM/OMG now in order to make a decision based on facts rather than promises. This proposed buyout will affect thousands of lives and the medical economics for the foreseeable future.

To have a health insurance company for profit, in charge of care givers seems like the fox in the hen house setting.

Thank you for your attention to this grave matter.

Lou Sinniger

Elmira, Oregon

131. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/14/24

Please refuse to allow another large corporation to control healthcare in Oregon. People are already struggling to find good care outside of Samaritan and Corvallis Clinic is one of the few choices available in the area not controlled by a major Corporation.

Suzanne Taylor

132. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/15/24

Please do not allow Corvallis Clinics to be purchased by OPTUM / United Health Care.

133. Subject: Say No to Optum purchase of the Corvallis Clinic

Received 1/15/24

To Whom This Concerns:

I'm a 74 year old retired occupational therapist, who has worked in several outpatient programs in Lane County and volunteered with Health Care for All- Oregon since it's inception in 2000. I strongly urge you to deny this purchase. At minimum, approve with significant conditions.

As you know, Optum is owned by UnitedHealth, a national insurance company, with no interest in the public health of the community of Corvallis and the surrounding communities the Corvallis Clinic serves. The priority will be profits, not quality care. Please see this scholarly publication January 11, 2023, in the New England Journal of Medicine at: https://drive.google.com/drive/folders/1Nsg5WE1yV0eR2bozEaaBLmguVzriHfGk?link_id=2&can_id=424d97aaedc2d382248bc115caa11ee6&source=email-public-option-warren-george-sbuhca-hayden-rooke-ley-chuck-pennacchio-2&email_referrer&email_subject=public-option-warren-george-sbuhca-hayden-rooke-ley

The Optum purchase is framed as the only way to keep the clinic open and the only way to save jobs of the employees. Is this true? Are there means to trim the administrative positions and administrative salaries and manage other costs to stay open with local control? Has every possible approach been tried? Can Optum be held accountable for unmet promises?

Please give this proposal a comprehensive audit and, if you can, require the "proprietary secret" figures be revealed to only to the Health Care Market Organization in closed session or something similar- even if you need additional meetings- to bring in financial analyst(s) to complete detailed review by people sworn to confidentially. The community must not take their word on such a major decision with impact upon so many people.

Sincerely,

Charlotte Maloney

134. Subject: Re: Optum/UnitedHealth takeover of The Corvallis Clinic

Received 1/15/24

We, the undersigned concerned Oregonians, oppose Optum/UnitedHealth taking over The Corvallis Clinic, especially without a comprehensive review. Our objections include the following concerns:

1. Corporate Interests vs. Public Health: Optum Oregon MSO is owned by UnitedHealth Group Inc., the largest healthcare corporation in the US. Its primary responsibility is to its shareholders, focusing on maximizing profits. This business model requires prioritizing financial gains over patient welfare.

2. Impact on Local Healthcare: UnitedHealth's record as the 10th largest corporation in the nation underscores its efficiency in generating profits. However, this comes at the cost of patient care. The takeover of The Corvallis Clinic by such a corporation will lead to increased costs and reduced quality of care for Oregonians.

3. **Affordability and Accessibility Concerns:** The introduction of a mega-corporation like UnitedHealth in to our local healthcare landscape raises serious concerns about the affordability and accessibility of healthcare services. Experience and history proves that corporate takeovers lead to increased costs without improving quality of care.

4. **Distrust in Corporate Promises:** The statements provided by Optum Oregon MSO in their application are refuted by historical evidence. Corporate takeovers of healthcare, particularly by UnitedHealth, have not benefited public health as promised.

In light of these points, we urge the responsible authorities to consider the broader implications of this takeover on the health and well-being of Oregonians. We believe that healthcare should prioritize people over profits, and we strongly advocate against this takeover.

If more evidence is needed that Optum/UnitedHealth will not be able to live up to their promises, we believe it meets the criteria for conducting a comprehensive review under ORS 415.501, since there is certainly potential to have a negative impact on access to affordable care in Oregon, and it also meets the criteria for convening a Community Review Board.

Let's keep our healthcare local, accessible, and patient-centered. Please deny the takeover of The Corvallis Clinic by Optum/UnitedHealth, or conduct a comprehensive review with a Community Review Board if more evidence is needed.

Sincerely,

Jenny Abeling

135. Subject: Concern re: Optum purchase of The Corvallis Clinic

Received 1/15/24

Dear OHA,

As a physician with over 20 years experience in local Oregon healthcare, I feel a need to express my concern with private equity gaining a large presence in the Linn/Benton county area. I have worked insurance contracting as a private practicing physician, for Samaritan Health Systems doing utilization review for its 5 hospitals for several years. United Health Care and its subsidiary Optum have a very dark reputation for deny needed services and while paying lip service to quality, provide lower quality service than the entities they purchase.

I am very concerned for the thousands of patients serviced by the Corvallis Clinic. That this sale will provide them with low quality health care, less access and fewer options. On the clinician side, Optum under pays and over works their clinicians using unsustainable metrics to justify their payment structure. This is likely to destabilize an already strained local health care system that is having challenges recruiting high quality primary care and clinic based specialty care.

I am not sure of the regulations governing this sale. Any more local option would be a far better partner to The Corvallis Clinic and for its patients: Providence, Keizer, Samaritan, OHSU. Those entities are vested in health care over profit, have strong practice histories in Oregon. Optum does not and is a disaster in Staes where they hold a majority of clinics and insurance contracts. I use you to block this sale if at all possible and encourage The Corvallis Clinic to investigate a better purchaser.

Thank you for your time and consideration.

Sincerely,

Thomas M Steele, MD

Corvallis, OR

136. Subject: Re: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/18/24

Hello Stacy,

Thanks for the opportunity to submit a revision.

To Whom this may concern,

I am writing in response to the proposed acquisition of the Corvallis Clinic by Optum/United Healthcare(UHC) .

In researching the Corvallis Clinic situation, it appears they have sustained insurmountable financial loss exacerbated by the Covid 19 pandemic and have decided to sell.

Health care provision is increasingly complex these days. Most are familiar with the patient quality and provider aspect of a clinic. The other half of this business is equally complex. It entails Human Resources (hiring, training, credentialing, payroll, pto, union relations etc) Purchasing (medical, office and tech supplies and equipment etc) Revenue Cycle (insurance company contracts, electronic billing, accounts receivable, medical records, authorizations, regulatory compliance, etc) and Plant Maintenance (keeping the facility heated,cooled,clean, lights on, waste disposal,emergency backup etc). It's a complex business and is getting more challenging, expensive and labor intensive.

Our community grieves this loss and also understands that competition in business is healthy. In today's healthcare market it seems inevitable they will be purchased by a larger corporation.

My concerns are twofold. Naturally a primary concern will be Optum/UHC's quality of care and patient access. I think this can be researched by your committee through surveys and publically reported data about their existing clinics in Oregon and Nationwide.

The second concern is the business side aspects of the proposal. I'll pose my concerns in the form of questions for the service area of Linn, Benton, Lincoln and parts of Marion and Polk counties. I don't anticipate a reply but rather to be considered for your review.

Will Optum/UHC be a partner and contribute to the health and well being of All of our communities?

Does the parent company, UHC , sell policies for ACA

Marketplace in our communities?

Does the parent company, UHC, sell Medicare Advantage policies in our communities?

(if no to either, why not?)

Will staff salaries and benefits be comparable to existing community standards and cost of living?

Will current staff contracts be honored?

2/6/2024

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Will existing payor contracts be transferred to and honored by Optum? If soon to expire will they extend renewals to allow time for consumers to adjust and purchase policies that remain in network for the clinic and their other preferred vendors of care?

Will Optum/UHC work with existing Healthcare Providers (example: hospitals, physical therapy, lab, pharmacy, diagnostics, Skilled Nursing Facilities/Rehabs, Home Health and Hospice, Behavioral Health) to assure there are adequate preferred provider contracts for these referral sources in ALL of our communities?

A big concern for me in the acquisition is assuring community members will have insurance policies that cover clinic care AND downstream providers that are also in network. A mismatch could lock patients out of affordable access due to higher co-pays from out of network policies or interfere with the ability to obtain post acute care or post clinic care. This part of the transaction is of utmost importance to consider when you weigh the benefit to our communities.

It is important that Optum/UHC verifies and agrees that both of their businesses can and will provide quality care that is adequately covered by existing and future payor and provider contracts to assure in network, affordable care for the entirety of the patient's healthcare continuum.

Thank you,

Rebecca Benson

Waldport, Oregon

137. Subject: OPTUM Merger in Corvallis

Received 1/16/24

I am completely opposed to the merger of OPTUM with the Corvallis Clinic. As a patient of that clinic, it is terrifying to think that a multi-national insurance company will be setting protocols and practices for my health-care. I trust my doctors to deliver quality medical care. I do not trust insurance companies to do more than pay the bills, and even then their actions are suspect as they are motivated by corporate profits, not patient care and service. I expect that the Oregon Health Authority will do a Comprehensive Community Review Board process to evaluate this merger thoroughly and determine how best to help the Corvallis Clinic and its dedicated staff of doctors, nurses and support staff continue the quality, locally controlled service that they are known for in this community.

Thank you,

Marj Cannon

Corvallis, OR

138. Subject: Optum buyout of Corvallis Clinic

Received 1/16/24

I am writing in opposition to the Optum takeover of the Corvallis Clinic. Reading through previous testimony, it is clear that all evidence leads to the conclusion that the deal would result in higher costs to patients, as is the pattern in mergers in the health care sector, which are driven by profit.

If investment-driven corporations are capable of generating profit while providing better for less money, they have failed to demonstrate it in my lifetime. Costs have steadily risen far faster than inflation due to the focus on the bottom line at the expense of quality of care, as numerous indicators have consistently shown

These points were explained in detail in previous testimony to the Oregon State Senate Health Committee:

<https://olis.oregonlegislature.gov/liz/202311/Downloads/CommitteeMeetingDocument/277682>

Optum cannot be expected to be any different, given the record of its parent company United Healthcare, which has consistently been an insurance industry leader in illegally overcharging the government while saving money by putting barriers in the way of patents seeking more expensive care, primarily through restrictions in network coverage and delays in prior approvals of tests and treatments. The latter have led to measurable increases in patient morbidity.

<https://www.nytimes.com/2022/10/08/upshot/medicare-advantage-fraud-allegations.html?searchResultPosition=1>

<https://portside.org/2023-06-01/20-billion-scam-heart-medicare-advantage>

If Corvallis Clinic has gotten into financial trouble, it is due to mismanagement. The solution is not to allow it to sell itself to a Wall Street firm whose purpose is to provide profits to investors rather than care to patients, but to force it take the more difficult option of seeking a loan after doing a professional review of its practices and coming up with a more feasible business model of providing services as a provider-owned entity.

Rick Staggenborg, MD

Albany, OR

139. Subject: Optum, a bad deal for Linn and Benton communities

Received 1/16/24

Dear OHA,

As a practicing physician in Linn and Benton counties, I strongly appose the sale of The Corvallis Clinic to Optum. It is truly heart breaking news that The Corvallis Clinic is selling out to Optum. I have over 25 years as a practicing Oregon physician: caring for patients in inpatient, outpatient and ER settings. I also have significant experience on the utilization review side of health care working with United Healthcare (UHC). Finally, I have heard from colleges about UHC clinical arm Optum and how they push profit over quality while paying much lip service to quality. In the end, they are for profit and more interested in profit over patient care.

I am very concerned for the thousands of patients serviced by the Corvallis Clinic, that this sale will provide our community with low quality health care, less access and fewer options. On the clinician side, Optum under pays and over works their clinicians using unsustainable metrics to justify their payment structure. They do this while paying significant lip service to quality, that they don't achieve or sustain. If this sale is completed, it is likely to destabilize an already strained local

health care system that is having challenges recruiting high quality primary care and clinic based specialty care.

A more local option would be a far better partner to The Corvallis Clinic and for its patients and our community: Providence, Keizer, Samaritan, OHSU for example. Those entities are vested in quality health care over profit, have strong practice histories in Oregon and truly place patients first. Optum does not and is a disaster in states where they hold a majority of clinics and insurance contracts. I urge you to block this sale if at all possible and encourage The Corvallis Clinic to investigate a better purchaser.

Thank you for your time and consideration.

Sincerely,

Thomas Steele, MD

Corvallis, OR

140. Subject: OPTUM

Received 1/16/24

Good morning,

I'm writing in regards to the proposed acquisition of the Corvallis Clinic by Optum Health/United Healthcare. Apparently, there were supposed to be 30 days of public comment available for this transaction, which would have closed public comment on January 28, but instead the public comment closes this week. Please extend public comment until January 28 and delay any decision on this acquisition until after then.

Given that the public comment requirement was not followed, please carefully review that all other submission requirements are in compliance before making any decisions regarding this acquisition.

Thank you for your time,

--

Cathy Soward

Corvallis, OR

141. Subject: FW: Please Defeat Optum purchase of the Corvallis Clinic

Received 1/16/24

To All:

Because the sale of the Corvallis Clinic to Optum requires approval, I am writing to urge you to say NO to this purchase.

This purchase appears to be designed to defeat universal health care in Oregon (SB 2089 and Measure 111) and by so doing, defeat the will of Oregon citizens. By purchasing clinics, hospitals, and medical practices, everything would be in the control of insurance companies or their subsidiaries.

As you know, Optum is a subsidiary of the largest health insurance firm, United Health Care. So far, Optum has purchased a major clinic in Eugene and Portland.

This sale would end the reason the Corvallis Clinic was created - which was so that Corvallis would have a multi-faceted clinic, run by, and responsible to, medical practitioners.

Such a purchase would divert local health care money to distant CEO elites who would transfer profits to their top brass and to Wall Street stockholders. Corvallis could no longer control their health-intended dollars.

As a retired supervisory contract specialist in four federal agencies, I know the challenge to achieve effective and efficient results when having to negotiate on a sole source basis. In my review of information on this subject, this sale would produce for Oregon residents seeking effective and efficient health care a downward spiral of negative results.

In summary, please vote NO on this acquisition and encourage your colleagues to vote NO also.

Thank you for your consideration

Sincerely,

Sheila

Sheila Ann Coxon

Corvallis, OR

142. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/16/24

Large profit driven insurance companies should NOT be buying health care practices. Period!

143. Subject: Optum comment

Received 1/16/24

I will be brief: Stop the take over of local healthcare. Please convene a community review board ASAP so you can hear how the people feel.

Profit-driven health care is literally killing us!

Private equity firms are well-known promise breakers. You have the power to say no to Optum. We are counting on you to protect Oregonians. Please do so!!!!

Sincerely

Sandy Polishuk,

Portland

144. Subject: Optum takeover of Corvallis Clinic.

Received 1/16/24

This email pertains to the proposed takeover of the Corvallis Clinic by United Health under the name Optum Oregon.

Please do not let this happen as the Healthcare industry is in enough of a shambles, the last thing we need is a big corporation buying the local company out and gutting it, sacrificing Healthcare in favor of profits.

145. Subject: Optum buying The Corvallis Clinic

Received 1/16/24

I have grave concerns about Optum buying The Corvallis Clinic. I work in the healthcare industry and I can say without any reservations that United Healthcare/ Optum is the only insurance that I have had serious issues with. They simply cannot be trusted. They are a huge corporation which seeks to monopolize the industry. They do not have patients best interests at heart they seek to pad their wallets. This is horrible for the Willamette Valley, Oregon and the healthcare industry. Please do not let them buy The Corvallis Clinic.

Regards,

Candy Smejkal

146. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/16/24

Hello,

It is common for a regulatory agency to become captured by the industry it regulates. This is one of the primary purposes of starving the regulatory structure for dollar support so they don't have the breadth and depth of expertise necessary to combat the onslaught of highly funded corporate interests. I've seen this phenomenon up close with the electric utility industry and its regulation.

I don't know exactly what UHC is telling your oversight committee. Still, in my experience, it is common for a corporation to deliver only a tiny fraction of what they promise in the sales pitch. Enough articles have been written recently about how UHC and other corporate insurers have done with promises with Medicare Advantage plans and the resulting lack of performance to the consumer. Your members should be up to speed on these trends. Please don't fall for their sales pitch.

Corporations don't make profits by providing services in a market where there are no other options for customers. They make them by reducing services and increasing prices.

Thank you for listening,

Jay

Jay Guettler

Florence, OR

147. Subject: Optum / United Health buyout of The Corvallis Clinic

Received 1/16/24

Greetings OHA Health Care Market Oversight,

I am very concerned about the proposed buyout of The Corvallis Clinic by Optum/United Health Care. I strongly urge the HCMO to convene a Community Review Board before continuing with this takeover. I believe that if completed, this buyout will lead to much higher prices, reduced quality of care and many people won't be able to afford their care at The Corvallis Clinic anymore. There will also likely be many more denied claims, much greater individual and family medical debt, and probably many bankruptcies based on medical debt. My understanding is that Optum/United Health Care has already stated they are going to raise prices across the board.

That said, The Corvallis Clinic is clearly in deep financial trouble and cannot continue for long without making changes. So, here are some potential solutions I hope will be considered that could result in cost savings while maintaining quality of service:

- Convert The Corvallis Clinic to a co-op owned by all of its member-employees (like Bi-Mart).
- Merge with another non-profit healthcare organization in Oregon, perhaps Samaritan Health or Kaiser Permanente.
- Enter into cooperative resource sharing agreements with Samaritan Health to reduce costs for both entities.
- Place The Corvallis Clinic into receivership, and assign an expert OHA-backed review board to investigate and make a concrete plan for The Corvallis Clinic to remain in business, while maintaining its non-profit status and prominent support of the community.

If the sale to Optum/United Health care is deemed necessary to go forward, then I propose that strict, comprehensive and ongoing oversight be done by OHA. This would include an easy-access claims contesting and review team who can override United Health Care's denials of claims. The review board should also set maximum prices and minimum quality of service which would be enforceable by OHA. There should be much more oversight, but this would be a good start.

Sincerely,

North Krimsly

148. Subject: opposition to further movement towards corporate monopoly or oligopoly health care in Linn, Benton and Lincoln counties.

Received 1/16/24

Dear Sir or Madam:

I oppose the ever increasing corporatization (and ownership by private equity funds) of health care entities in Oregon, specifically this time--the possible purchase of The Corvallis clinic by United Health. It has never been clear to me why it's acceptable, even fostered, in the US for fewer & fewer large corporations to dominate entire business or industrial sectors. We're seeing the result of that happening in health care as well as Boeing's domination of civilian jet manufacturing in the US.

At this time, Samaritan Health a so-called non-profit, has close to a monopoly of health care providers in Lincoln, Linn and Benton counties. It has successfully persuaded Lincoln county to support it via its health district (primarily Newport) to pass a bond levy to build a new hospital in Newport JUST for Samaritan Health, to raise funds to build an "education center" although Sam Health provides NO/ZERO no support to quit smoking (or vaping, or dipping or any other use of tobacco or nicotine) other than a video. So good to know that smoking, dipping, chewing & vaping flavored tobaccos is no longer a health threat in Lincoln county.

Now Sam Health expects the Newport and/or other parts of the county to provide funding for a drug treatment center, in patient & outpatient, located in a residential area (via conditional use permit that was effectively approved before the planning commission's hearing. Nothing like having a private non-profit control what's supposed to be a public governmental process. Now, Sam Health is pushing its own Medicare Advantage program, despite growing evidence that many MA programs don't provide the care promised but probably are nice little earners for the providers of that insurance. That's what happens when a corporation has a virtual monopoly on care.

Why is that ok? Corvallis has a total of 2 independent clinics (I'm aware of only one independent MD office in Lincoln county, no independent physical therapists), now it seems that one, The Corvallis clinic, may be swallowed up by United Health care, which will (as Sam Pac has) subordinate quality of health care to the higher priority of maximizing profit.

We can't have national health care in the US because somehow that's just wrong and the odd belief that gov't screws up everything but bloating the national "defense" budget & subsidizing some "sectors" of the economy and, of course, the wealthy via tax cuts, tax loopholes, underfunding the IRS so it lacks staff to perform regular audits of large corporations, but apparently in late 20th century and 21st century, it's ok for two profit making "health care corporations" (non-profit is NOT not for profit) to dominate health care in a 3 county region. Result: hospitals are understaffed, RNs in OR have been striking because of attempts to initiate 2 tier wage practices (new RNs are paid far less the senior RNs, clear intent to gradually lower RN compensation), under staffing of wards, failure to provide adequate security for protection of hospital staff, failure to raise compensation of those actually providing care & customer service (as opposed to "executives") to increase staffing when needed, so that those providers actually stay.

I haven't received care at The Corvallis clinic but through my former work, I have reviewed medical records from the Corvallis clinic, and during the pandemic, has a electronic face to face interaction w/a Corvallis Clinic MD regarding a mutual client. I was impressed by the MD's willingness to speak with me, the MD's caring attitude & knowledge of the mutual client's medical and other issues, and evaluation of that client's functioning. This MD had a treatment relationship with the client, not just one to two 20 minute visits, and had also reviewed some of the client's past history prior to our meeting. I doubt if most of the Sam Pac health care providers in Lincoln county could provide a similar quality of information and evaluation.

I very much doubt if The Corvallis Clinic would prioritize health care and quality MD/patient relationships if a profit seeking giant like UH is allowed to take it over & add it to its every growing empire w/in the health "industry."

For the above reasons: decline in quality of health care provided to patients/clients, probably higher health care provider stress levels & lower work satisfaction but more profits for UH, I oppose allowing UH to take over The Corvallis Clinic. Maybe it's time to revise those Medicare provisions

that, as one now retired MD told me, enabled Sam Pac to be reimbursed MORE MONEY for his services, then he'd been able to as a private practitioners.

I want to see an end to federal, state & local support (in all the ways that exist) towards more & more "consolidation" of health care providers or a creation of a private monopoly of health care--subsidized by everyone else. Start w/stopping takeover by a massive corporation of The Corvallis Clinic

Susan H

149. Subject: Optum & Corvallis Clinic

Received 1/16/24

To whom it may concern:

I am writing in opposition to the purchase by Optum of The Corvallis Clinic. I am a 76 year old lifelong Corvallis resident.

I have reviewed the materials and testimony coordinated by Mid-Valley Health Care Advocates including the "Lund Report" and support their concerns.

I think the recent changes in Oregon's health care regulatory scheme should be allowed to play out and that a locally owned non-profit alternative should be explored.

Please deny this application for purchase/merger.

Thanks,

B. Bond Starker

150. Subject: Optum (United Health Care) takeover of Corvallis Clinic

Received 1/16/24

To all it may concern,

I've been a counselor in the Corvallis community for 39 years. I've worked with two non-profits and Linn-Benton Community College.

From a psychological perspective, there are a couple of red flags in how this sale is being handled

1. A huge amount of the document of sale is redacted and can't be known.
2. Instead of the 30 days public notice our state requires, Optum/United is giving 21 days AND they made the announcement right between Christmas and New Years, when so many people are gone. Thereby making the time for public input even less.

If I were counseling a couple, and one of them was blocking out all sorts of critical information from the other, and then artificially limiting the other persons ability to respond, I would see this as one person sabotaging the process to have unequal power over the other.

And that is exactly what Optum/United Health Care has done. They have made every effort to stop the public from understanding what is happening, and having the time to think things through before responding.

Our statute also calls for “transparency” and an abundance of public input. This is exactly what Optum/United is trying to sabotage.

These are HUGE red flags for this relationship right up front. Right at the beginning there is dishonesty and a weaseling around any fair and reasonable process.

Please stop this sale. I would prefer that you deny the sale altogether. But at least delay it for several months so the Corvallis community has time to understand what is happening (most folks have no idea about this) and time to give thoughtful input.

Thank you for hearing me out.

Mark Weiss

Chair, Mid-Valley Health Care Advocates

151. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/16/24

Please help keep the Corvallis Clinic accessible and affordable for patients. Optum/United Health has a controversial and unpromising record in this regard. Please also keep governance of Corvallis Clinic local and largely in the hands of the doctors who work there and serve their patients. Please don't allow Optum/United Health to become a controlling force.

Thank you,

Blaine Vogt

Corvallis, OR

152. Subject: Optum

Received 1/16/24

Hi,

I'm writing to express my opposition to the buyout of the Corvallis Clinic by UnitedHealthcare/Optum. This sort of consolidation into mega-providers is exactly the opposite of what we need in order to achieve affordable care that is responsive to the needs of our local community.

Please make a statement against the ongoing consolidation of the healthcare industry by blocking this merger.

Thanks!

Mark Luterra

Corvallis, OR

153. Subject: Re: Optum/UnitedHealth takeover of The Corvallis Clinic

Received 1/16/24

I oppose Optum/UnitedHealth taking over The Corvallis Clinic, especially without a comprehensive review. My objections include the following concerns:

1. Corporate Interests vs. Public Health: Optum Oregon MSO is owned by UnitedHealth Group Inc., the largest healthcare corporation in the US. Its primary responsibility is to its shareholders, focusing on maximizing profits. This business model requires prioritizing financial gains over patient welfare.
2. Impact on Local Healthcare: UnitedHealth's record as the 10th largest corporation in the nation underscores its efficiency in generating profits. However, this comes at the cost of patient care. The takeover of The Corvallis Clinic by such a corporation will lead to increased costs and reduced quality of care for Oregonians.
3. Affordability and Accessibility Concerns: The introduction of a mega-corporation like UnitedHealth in to our local healthcare landscape raises serious concerns about the affordability and accessibility of healthcare services. Experience and history proves that corporate takeovers lead to increased costs without improving quality of care.
4. Distrust in Corporate Promises: The statements provided by Optum Oregon MSO in their application are refuted by historical evidence. Corporate takeovers of healthcare, particularly by UnitedHealth, have not benefited public health as promised.

In light of these points, I urge the responsible authorities to consider the broader implications of this takeover on the health and well-being of Oregonians. I believe that healthcare should prioritize people over profits, and I strongly advocate against this takeover.

If more evidence is needed that Optum/UnitedHealth will not be able to live up to their promises, I believe it meets the criteria for conducting a comprehensive review under ORS 415.501, since there is certainly potential to have a negative impact on access to affordable care in Oregon, and it also meets the criteria for convening a Community Review Board.

Let's keep our healthcare local, accessible, and patient-centered. Please deny the takeover of The Corvallis Clinic by Optum/UnitedHealth, or conduct a comprehensive review with a Community Review Board if more evidence is needed.

Sincerely,

- Patch Adam Perryman

154. Subject: Optum

Received 1/16/24

We strongly request that you convene a Community Review Board immediately regarding the acquisition of the Corvallis Clinic by Optum.

Just a simple review of Optum health Services finds a class action lawsuit approved by a North Carolina judge, a Better Business Bureau rating of F in the Los Angeles area for a health care entity taken over by Optum and a lawsuit in California with Optum as the defendant.

Oregonians deserve oversight so that health care is a service and not an overly generous profit cash cow.

Marcia Kelley

Public Policy Advocate

Oregon Women's Rights Coalition

155. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/16/24

PLEASE do not approve the takeover of Corvallis Clinic by the mega-corporation, United Health/Optum. This would not be healthy for the Clinic's patients,

Jeanne StJohn, Ph.D

Newport, OR

156. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/16/24

It's critical to protect the region consumers. United Health Care track record indicates that protection for locals is not the priority. Ignore the promises and reject this proposed buyout. Albasny, Corvallis, Lincoln City, Newport and Philomath deserve your protection.

157. Subject: Comments on Optum proposal

Received 1/16/24

I am very concerned about the proposal for United Health Care's Optum division to merge with the Corvallis Clinic and strongly urge the Oregon Health Authority (OHA) to not approve it. I have relied on the doctors at the Corvallis Clinic since our family moved to Corvallis in 1965. The prospect of the Corvallis Clinic being sold to Optum makes me extremely worried about the future of healthcare in Corvallis and other communities in the mid-Willamette Valley.

The website for the Health Care Market Oversight (HCMO) Program states that its purpose is to "Ensure that health care consolidation in Oregon supports statewide goals related to lower costs, equity, increased access, and better quality." The facts cited in the January 2, 2024 Lund Report and in Optum Oregon's record of declining level of healthcare service following its acquisition of Eugene's Oregon Medical Group clearly indicate it would not provide the same level of healthcare, would not be able to maintain the same level of access, and would not continue the same level of affordability to patients and customers of the Corvallis and the mid-Willamette community.

Furthermore, the "Plan of Merger" document clearly states that the Corvallis Clinic will cease to exist once approved, so this proposal should really be treated as an acquisition plan, since the Corvallis Clinic's current management would no longer be able to ensure the quality, accessibility, and affordability of healthcare provided remains the same.

The OHA is the only entity that can prevent the potentially disastrous consequences of this acquisition, provided it uses the full authority granted to it by the Oregon Legislature and challenges Optum's lack of transparency and the absence of any meaningful details in its plan to

improve the Corvallis Clinic's operations. The vague descriptions provided in Optum's application form are a perfect example of the need for more detailed information on Optum's methods, and if they are based on proven results in their previous acquisitions. More specific information is needed from Optum that is based on actual experience with its previous takeovers of healthcare providers (and the Oregon Medical Group in particular), to support its claims that its administrative and management systems will improve the quality and affordability of healthcare in the Mid-Willamette Valley. Also, OHA should require more specific details from Optum about how they will safeguard access to quality healthcare during the multi-year time period needed to conduct their thorough review of the Corvallis Clinic's "operational challenges and workflows" and then implement Optum's "operational standards and efficiencies." OHA should review the proposal's information thoroughly and also conduct their own research, so it may identify any necessary conditions "to mitigate any negative consequences for patients and consumers," as the HCMO's website states it was established to address.

While I am aware the Corvallis Clinic is in dire financial circumstances, we should not have to accept the proposal by Optum as the only solution to that problem. With so little financial information provided to the public about the financial health of the Corvallis Clinic, and about this proposal in particular (significant amounts of important financial and organizational details are redacted in the public's view of the application), it is impossible to determine if Optum's offer to acquire the Corvallis Clinic is the only way to ensure that the quality, accessibility and affordability of healthcare we have in the mid-Willamette Valley will continue in the future. It is definitely not clear if this is the only way to prevent a rumored shutdown of the Corvallis Clinic, and if that is likely to occur soon. The mid-Willamette community deserves more information from the Corvallis Clinic and OHA as to why there isn't time for other buyers with better evidence-based reputations to be pursued and considered.

I strongly urge OHA to not approve Optum's merger proposal. Otherwise, OHA should ask for more detailed information from Optum to substantiate its claim that it will improve healthcare delivery and affordability. Also, OHA should initiate a Comprehensive Review, including establishing a Community Review Board and conducting its own research to address the issues I and many other concerned citizens have raised.

Nancy Schary

Corvallis

158. Subject: Block Optum's takeover of Corvallis Clinic

Received 1/16/24

To the Oregon Health Authority,

I am writing, as a Corvallis Clinic customer, as a concerned citizen of Corvallis, and a loyal resident of Oregon. I strongly urge the OHA to reject the proposal that UnitedHealth/Optum Management Services take over the management and administration of the Corvallis Clinic. I understand that Corvallis Clinic is in dire financial straits and I would hate to see this vital health care resource implode. But giving UnitedHealth/Optum an even greater stranglehold on healthcare in Oregon is not an acceptable solution. We all know the statistics - the U.S. per capita healthcare costs are over twice what they are for other OECD countries while having worse outcomes by nearly every health metric recorded. These shocking results are largely a result of for-profit companies like UnitedHealth siphoning off corporate profits while over working healthcare providers and

underserving patients. And these distortions are only worsening as these unnecessary, for-profit, middlemen companies become increasingly more powerful thru the monopolization of healthcare. UHA is already the largest health care company in the country. We need to find other ways for Corvallis Clinic to survive while maintaining some semblance of competition for the likes of Optum/UHA.

Sincerely,

John Skillman

159. Subject: Optum/ United Health Potential Take-Over of the Corvallis Clinic

Received 1/16/24

Dear Health Care Market Oversight Board:

As a long-term patient of the Corvallis Clinic, I am deeply concerned about the potential take-over of my local clinic by a private, large scale national corporation that is likely to increase costs and limit access to necessary medical care for my family. Private, for-profit organizations like Optum/United Health are inherently more concerned about profits for their shareholders than in quality and affordable patient care. In this particular case, their track record has proven that to be true, regardless of what they may promise in the future.

I urge you to convene a Community Review Board at your earliest convenience in order to determine how this acquisition would affect the Corvallis community and its access to high-quality health care. Thank you for your consideration.

Sincerely,

Susan Aronson

Corvallis Clinic Patient

160. Subject: Comments from SEIU Local 49 on Optum Corvallis Clinic Deal

Received 1/16/24

SEIU Local 49 would like to express our concerns about the proposed acquisition of the Corvallis Clinic by Optum. This acquisition would represent a major shift in the healthcare marketplace in Oregon, transferring the ownership of a locally grown, physician-owned clinic network to a large out-of-state corporation.

As we detailed in our [Bigger Not Better](#) report, this kind of vertical integration is linked with increases in price with little to no improvement in quality. We believe OHA needs to, at the very least, thoroughly investigate the claims made in this application and take the time to hear the community's thoughts on the deal.

Optum is owned by UnitedHealth Group (NYSE: UNH), [one of the largest health insurance companies](#) in the United States. Optum is also now the [largest employer of physicians](#) in the country, with 90,000 employed or affiliated doctors, and is growing at a rapid clip – adding nearly 20,000 physicians in 2023 alone. Both Optum and UnitedHealth have been plagued by lawsuits and allegations of engaging in anti-competitive behavior, denying necessary patient care, and violating labor law. For example:

- Emanate Health, a nonprofit group of hospitals and physicians in CA, [filed](#) suit against Optum late last year accusing them of trying to eliminate Emanate from the local primary care market and to monopolize the market through unlawful and anti-competitive means.
- An independent pharmacy is [suing United Health's OptumRx](#) over "allegedly strong-arming pharmacies into agreeing to 'unconscionable' performance-based fees, threatening their financial health."
- STAT recently ran a series of investigative [articles](#) that found UnitedHealth, "pressured its medical staff to cut off payments for seriously ill patients in lockstep with a computer algorithm's calculations, denying rehabilitation care for older and disabled Americans as profits soared."
- Employees are currently suing UnitedHealth over allegedly [violating labor laws during layoffs](#).

We understand the current owners of the Corvallis Clinic are concerned about their finances, but that does not mean this deal should be ushered through without serious consideration about whether this acquisition is the best option for healthcare consumers. In addition, we urge the agency to refrain from making any decisions based on the premise that selling to Optum would allow the Clinic to maintain its current services to the community. Optum, though currently making [billions in profits annually](#) recently [shuttered 7 clinics in Florida and Minnesota](#). An Optum spokesperson noted that "We respond to local market conditions when determining our footprint." To better understand whether this deal would benefit Oregonians, we believe it would be of tremendous value to conduct an evaluation of the impacts on patient care after Optum purchased Oregon Medical Group in 2020. For example, it is worth serious study to understand any changes in clinical/quality data, access to care, and prices after the acquisition to place. It may also be useful to solicit feedback from Lane County patients about any changes they observed in their care following the transaction.

As a final note, we were disappointed to see the agency redact relevant details that would help the public to engage in this process, including critical information such as the number of patients served by the Clinic, the number of employees, key financial details, and potential changes to leadership and governance structure.

Laura Johnson (she/her)

Strategic Researcher

SEIU Local 49

161. Subject: Optum take over of the Corvallis Clinic

Received 1/16/24

I am a retired life-long health care worker who has practiced in a Nevada hospital, a multiple physician practice in both in Fresno and Albany, an independent lab here in Corvallis, and at the OSU Health Services; an aging patient of the Corvallis Clinic; and a long time member of Health Care for All Americans. The very last thing I want to see for my well being, or the health care of Corvallis residents, or the state of health care in the entire state of Oregon is to see United Health Care (Optum) bring in their spotted history of for-profit medical practice here to take over one of the largest provider groups in the mid-valley!

Leslee Lucas

Corvallis, Oregon

162. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/16/24

Hello

I am a retired physician who is deeply concerned over the financialization of health care in the United States and Oregon. Time and again, the take over of health organisations by large corporations has resulted in higher costs inflating way more than average inflation rates, and in some cases is reductions in healthcare quality. Please do not allow Oregon to become victim to this anti-health justice development.

Thx, Erik Fisher, MD

163. Subject: Saving The Corvallis Clinic

Received 1/16/24

Hey all you smart wonderful humans at the Oregon Health Authority!

Please STOP the sale of the Corvallis Clinic to United Health / Optum! We all know what happens when "for profit" trumps "for care". Patient care and Clinic employee satisfaction drops! Patients leave and so do wonderful doctors!

Oregonians are strong and smart. PLEASE figure out an equitable way to make healthcare work for all Oregonians without selling out to mega-for-profit corporations!

Thank you!

Judi Skillman

164. Subject: Optum isn't the quality healthcare I want

Received 1/16/24

Hi,

As a longtime patient of Corvallis Clinic, I don't want to see it merged with a huge company like Optum. I've trusted Corvallis clinic with intimate surgical procedures because I have longstanding relationships with the providers there. I don't want to see these excellent medical professionals lose compensation, get replaced with providers who won't have time to care for patients holistically, or leave because their values aren't represented by Optum. If this merger goes forward I'll be taking my business elsewhere. And as a public employee and member of SEIU, I'll be communicating my concerns about Optum as a healthcare benefit choice to decision makers who select health plans.

Thanks for considering these concerns.

Kind regards,

Elza Records.

165. Subject: [Letter] CORVALLIS CLINIC / OPTUM MERGER - LETTER IN OPPOSITION

Received 1/16/24

CORVALLIS CLINIC / OPTUM MERGER - LETTER IN OPPOSITION

My name is Barbara Markello and have been a resident of Corvallis for 19 yrs. I lived in Lebanon, Or, for 7 yrs prior to moving to Corvallis. My husband was a Lebanon Pediatrician for those 7 yrs. This letter is to give the perspective of how this type of merger affects healthcare for different populations.

Lebanon is a small, close knit community who depend on continuity and long-standing trust of the local medical group to provide their healthcare. Any change in that system results in mistrust of the healthcare system and reluctance to get preventive care (ie, annual checkups, vaccinations, etc). When Samaritan Health Services merged with Lebanon Community Hospital, there were significant changes to the medical providers contracts, however, the quality and continuity of health services provided to Lebanon residents remained unchanged. Residents could still see their local physicians for care, providing a smooth transition.

Fall of 2023, brought a subtle change affecting many Lebanon residents, esp those retired from a large company whose pension included a healthcare contract with United Health Corp. The retirees were notified by Samaritan Health Services, that UnitedHealth would no longer be accepted and would need to find another physician by Jan,2024. No referrals were suggested or made, but would require the retirees to travel further for healthcare. The reason for United Health Corp being dropped by Samaritan Health was not given, but it is suspected that United Health's health reimbursements have been too low, or too late, or both. Retirees and Seniors whose health and mobility are greatly diminished with age find this an unwelcomed and sometimes dangerous transition. The latest news: the Union was able to extend the transition and the use of the local hospital until Sept, 2024. It is uncertain what has happened to those without a Union to represent their health interests or what happens after Sept,2024.

Concurrent to Samaritan Health Services dropping United Health insurance plans, Optum Health began it's plans to acquire the Corvallis Clinic Multispecialty group. Lincoln, Benton, and Linn County's residents will all be affected. If the hospitals in Lincoln City, Newport, Albany, and Lebanon are owned/run by Samaritan Health, will the residents of these areas need to go to Salem to receive hospital services if they have United Health insurance? If yes, this is an example of inequity of the healthcare system in rural communities in Oregon and how large health care insurance corporations can manipulate the system by: First, being rejected from the health care lists of a major employer/health care provider, then, buyout its competitor. This leaves a disjointed, uncooperative system that greatly diminishes the quality and equity of health care for Oregon residents, especially the rural communities.

A personal note relates to United Health's acquisition of Oregon Medical Group in Eugene in 2020 (including Optum in 2022). I am relaying this scenario as indicative of what can happen when United Health (Optum) or any large, national health corp takes over physician-owned multi specialty groups in Oregon.

My mother was a Eugene resident for 25 yrs. Her physician and healthcare were managed by Oregon Medical group of Eugene. For 23 yrs, she maintained a regular schedule of annual

checkups and monitoring of her BP meds (high blood pressure) and other important blood values. There was a consistency of schedule and having the same provider was important in maintaining health outcomes. [On a side note: I have a counseling degree in Gerontology, so am familiar with health and mental health changes in Seniors].

After the acquisition of Oregon Medical Group by United Health in 2020, mom's care changed. There were several turnovers of her primary care doc, leading to my mom's confusion over who her health care provider was and when and what checkups were needed. There was no continuity of care and important details fell through the cracks. Her blood pressure meds were automatically refilled without blood work and no annual checkup or mental health screening was provided. In the last few months of mom's life, her blood pressure was low (yet she continued on HBP meds), her ankles were extremely swollen and was becoming chair-ridden in the assisted living apt. In Nov, 2021, she was hospitalized for an 'apparent stroke' (mri showed no clot or bleeding in the brain), excess water was removed from her body, and sent home. There was no adjustment to her meds, except for addition of a diuretic.

Eventually, her legs swelled, her heart slowed and became irregular and became bedridden. There was no contact from her doctor (her MD physician was switched at some unknown time, to an NP) She took herself off her own meds, but it was obvious other organs were affected by her heart failure and after about a month on hospice and being cared for in my brother's home, she died. That was March, 2022.

Large health insurance companies who are now taking over struggling physician-owned groups in Oregon, are having a negative effect on patient care. It seems even more so for Seniors. They are focused on preventative care, (which is important for the general population and most cost effective), at the expense of treating the illnesses common in old age. Seniors (esp the very old) do not ask questions about their treatment or write to their congressmen about their care. They are afraid to 'rock the boat' and possibly lose their healthcare provider. Several times before her death, I asked mom if I could talk to her provider about her care and was met with a resounding, 'No, please don't! I don't want to cause any trouble.' This is common among Seniors, and a sad reality that makes this group particularly vulnerable when takeovers, such as this, are allowed to go through, without quality assurance monitoring.

This is one personal example of what can happen. Many more are out there without a voice. Please examine carefully, this recent acquisition of the Corvallis Clinic by Optum. If OMG is representative of the outcome of such a takeover, many residents of Benton, Linn and Lincoln county will not be receiving the quality and equitable healthcare the Oregon Health Authority has committed to it's Oregon residents.

Sincerely,

Barbara Markello

166. Subject: Re: Proposed Optum purchase of the Corvallis Clinic

Received 1/16/24

I am a patient at the Corvallis Clinic, and I am opposed to the proposed takeover by Optum/UnitedHealth Group.

My concerns are:

1. UnitedHealth's history of increasing costs, poor patient care, poor customer service, and unethical business practices.
2. The loss of local management, local control, and redirection of health care dollars out of our community.
3. The loss of a physician-directed and physician-centered clinic, to be replaced by a profit-maximizing, stockholder-beholden monopoly.
4. Severing the ties between the Corvallis Clinic, the communities it serves, and the State of Oregon's healthcare system, services, and goals.
5. The broken relationship between UnitedHealth and Good Samaritan, Corvallis' only hospital.
6. The increased probability of Medicare patients being forced to either change to UnitedHealth's advantage plan, or leave the clinic and the doctors who have been providing their care.
7. Undermining SB2089, Measure 111, and the will of Oregon's people.

Thank you for your consideration.

Sincerely,

Carrie Phillips

Corvallis, Oregon

167. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/16/24

Please don't let Optum ruin the health care in Oregon.

Sue Hanen

Corvallis, Oregon

168. Subject: Optum

Received 1/16/24

I am not in favor of Optum buying the Corvallis Clinic. Local residents deserve to have a say in the future of their health care in their community.

--

Stan Hanen

Corvallis, OR

169. Subject: RE: Opposed to Optum acquisition of the Corvallis Clinic

Received 1/16/24

Hello,

I am a concerned resident of Corvallis and a patient at the Corvallis Clinic, where I receive care in internal medicine, allergies, radiology, physical therapy, and optometry.

I sincerely doubt that nature and quality of care of the Clinic's patients at 11 locations in our vicinity will benefit from a corporate buyout by Optum Oregon MSO LLC, front for the largest health care company in the U.S.

In general, when giant non-local corporations buy out local small businesses, which the Clinic comparatively is, the buyer usually makes its financial advantage the top priority and consequences to the local business and its customers a distant consideration.

United Health Care has received a good deal of criticism from patients (1), organizations (2) and legal advocates in recent months, criticism and legal action (3) which signals a disturbing trend in its policies and practices toward patients.*

The quality of care of the Clinic providers I see has been excellent, and notably, most of these practitioners hold an M.D degree, have considerable years of experience, and a commitment to our Oregon community and its people.

In addition, the Clinic currently accepts my Medicare Supplement Plan provided by Oregon-based insurer, Moda through PERS, a choice which I doubt United Health Care would continue.

United Health Care may benefit from acquiring the Corvallis Clinic, but I am currently opposed to this acquisition for the reasons mentioned and I ask OHA and HCMO to oppose it as well.

Sincerely,

Corvallis

1. https://www.consumeraffairs.com/insurance/united_health_care.html

2. <https://www.healthcarefinancenews.com/news/patient-groups-criticize-unitedhealthcares-medicare-advantage-marketing>

3. <https://www.statnews.com/2023/11/14/unitedhealth-class-action-lawsuit-algorithm-medicare-advantage/>

170. Subject: Optum - Corvallis Clinic merger/fbuyout

Received 1/16/24

To the Oregon Health Authority,

I am a retired family physician whose small clinic in Philomath joined the Corvallis Clinic in the early nineties as the managed care boom accelerated the coalescence in medical care. I have no first hand knowledge of the clinics current situation, but presume it is dire. The Corvallis Clinic has a very interesting and admirable history of being founded following WWII by excellently trained, idealistic physicians who lived and practiced guided by those principles. Medicine has changed in many ways over those 80 years or so. I know that this merger is an issue that needs to be resolved based upon the realities of today and not what could be a more fair and economical way of providing good medical care.

That being said, I would like to urge you to do all that you can to see that all alternatives to this proposed "sale" to United Health Care or Optum have been explored. I find myself wondering if

there are barriers to joining the Samaritan group, some other kind of restructuring, or nonprofit status would support a different alternative. Obviously, I am ignorant of the details and possibilities, but I must express my reservations. I know that I would never choose United Health care for my own insurance or choose Optum for my health care. I don't see how Optum is going to take its 8% and maintain the quality we have now, much less improve it. I appreciate the fact that Oregon has something like the Oregon Health Authority to evaluate issues like this.

Sincerely,

Bruce Byram, M.D.

171. Subject: Impact concerning matters of Optum Oregon MSO and Corvallis Clinic

Received 1/16/24

Oregon Health Authority Health Care Market Oversight committee

I request that you convene a Community Review Board immediately to assess the impact this possible change will have on our community. What history does Optum have for building the community in which it operates? How does it build and serve the community: patients, physicians, clerical staff, food service employees, and any others?

Thanks for giving this important matter your attention. I look forward to Corvallis Clinic's continuing presence and contribution to our community.

Sincerely,

Janice Ames, Corvallis senior citizen

172. Subject: Optum

Received 1/16/24

I have grave concerns regarding the takeover of Corvallis clinic by optum a subsidiary of United healthcare. Are you aware that Good Samaritan care givers and all 5 hospitals in their system do not take United Healthcare? If a patient goes to any of their providers or hospitals , they will have to pay out of network fees. Less money for Optum to pay and more cost to the patient. If one talks to pharmacists and healthcare providers as to why they no longer accept United healthcare it is because they DO NOT PAY for services rendered. It is not about good patient care but corporate profit.

In the local newspaper it is stated that Corvallis Clinic physicians will be taking a 15% pay decrease and some maybe more. Optum will decide who will stay after a background check. It is hard enough to attract good physicians to our area, and if you are good , why would you stay with a company who cuts your salary, offers you healthcare that all the local hospitals and many providers and pharmacies do not take and will probably base your staying or going not on good care but profit for the company?

The Corvallis clinic and Good Samaritan have had a good working relationship in the past with some ups and downs. They care about this community. They live here. To give away local control of medicine to a for profit company with a poor track record for paying for care makes no sense.

The people of Corvallis deserve better. We will be the ones with no options for good healthcare and will have to travel even for emergencies and acute healthcare. Please consider more local input before you allow this controversial and compromising takeover.

Sincerely,

Lydia Fusetti MD

173. Subject: Corvallis Clinic sale to Optum - United Health Care

Received 1/16/24

Greetings Oregon Health Authority

My wife and I recently learned of the proposed sale of the Corvallis Clinic to Optum, a subsidiary of United Health Care. As you know, United Health Care (UHC) is the health benefits business of the oligopoly known as United Health Group, the largest health insurance organization in the world. In October there was an article in the Economist about 'Big Health' in the USA. I've attached it to this message. This passage is especially relevant:

With little room left to grow in their core businesses, and trustbusters blocking attempts to buy direct rivals, the oligopolists have been expanding into other bits of the health-care supply chain. Besides adding to the top line, such vertical integration is juicing margins. The Affordable Care Act of 2010 limited the profits of health insurers to between 15% and 20% of collected premiums, depending on the size of the health plan. But it imposed no restrictions on what physicians or other intermediaries can earn. The law created an incentive for insurers to buy clinics, pharmacies and the like, and to steer customers to them rather than rival providers.

Consolidation, as we so often see in the US, does not benefit consumers. It results in fewer choices of lesser quality, witness what happened with the airlines. Currently, 47% of what Americans spend on health care does not go towards actual care, instead to health insurance intermediaries. It pays their administrative costs, staff and executive salaries, and most importantly, fills their coffers with substantial profits. This is wrong, it's at the heart of the dysfunctional health care system we have in America. A system where we spend more and get less. And it flies in the face of Oregon Measure 111 to provide universal quality health care for all Oregonians.

Please stop the sale of the Corvallis Clinic to Optum/United Health Group, we are directly opposed to it. Contrary to the claims, it will benefit no one other than United Health Group. My wife and I receive most of our (excellent quality) health care from Corvallis Clinic, we do not want that to change by ownership whose sole purpose is profit.

I can tell you from personal experience UHC is not an upstanding company, they do not act in the consumer's best interest. My supplemental Medicare insurance is through them, I consider them predatory. Especially with elderly people on Medicare. They present themselves as caring/engaging with a plethora of reach-out communications but what they are really doing is collecting information. Reality sets in when claims are filed. My financial advisor reports they had 86 million dollars of outstanding claims on their books this past October, I cannot verify the accuracy of that statement. But the \$25bn in pre-tax profit they made last year is not disputable. My dentist of 25+ years will no longer accept claims on UHC coverage plans, they sent out a letter saying so. And Samaritan hospital will no longer accept UHC patients except in an

emergency. Those are telling signs. Is this the kind of company you're endorsing to buy the Corvallis Clinic?

There is another troubling aspect of this proposed sale – the speed and time of year at which it's happening. It has elements of a fly-under-the-radar operation lacking appropriate public communication and feedback. Which makes me wonder who else stands to profit from this sale? At the very least it should be postponed 3 months until better vetted with the people of Corvallis and the surrounding area.

Sincerely,

Thomas Twigg, HP Retired

174. Subject: Optum proposed acquisition of the Corvallis Clinic

Received 1/17/24

To Whom it May Concern,

I am a patient at Corvallis Clinic. Please do not approve the acquisition of Corvallis Clinic by Optum. The proposed Optum takeover would increase costs to healthcare consumers. Healthcare costs are already through the roof, making healthcare less and less accessible to those who need it. This is antithetical to the goals of the Oregon Health Authority, which include providing accessible and affordable healthcare to all Oregonians.

Thank-you,

Margi

Margi Willowmoon

Corvallis, OR.

175. Subject: Optum buyout of The Corvallis Clinic

Received 1/17/24

To Whom It May Concern:

It concerns me greatly, that the ultimate ownership of my health care provider--The Corvallis Clinic--could be United Health Care. As one of the largest insurance companies in the United States, it doesn't sit well that they are branching out into Health Care itself--here in the town I have lived for almost 40 years.

Oregon is a small state which has so much going for it. We don't need a huge insurance company setting the prices for our health care needs. Health Care is in a sorry state these days--lots of patients to not enough doctors. Insurance rates going up almost every year. The cost of health care going up and up. I don't know all the ins and outs--I admit it, but this doesn't seem like a good idea to me. Monopolies don't help people. They exist so they can take over the market, set the prices they want, and make as much money as possible with little to no regard for the people who need what they are selling. Everyone needs health care at some point in their life. We don't need a company to monopolize health care in Corvallis.

I object to the sale of The Corvallis Clinic to Optum/United Health Care. I hope you--at the Oregon Health Authority--will take my opinion into account when you make your decision.

After all, I am one of the people in Corvallis who will have to live with the choice you make for us.

Stephanie Toohey

Corvallis, OR

176. Subject: Oppose Optum purchase of Corvallis Clinic

Received 1/17/24

I strongly oppose the takeover of the Corvallis Clinic. It will lead to higher costs, poor patient services, and profiteering, with profits going out of state.

This should be an easy decision for OHA: Please do not approve this corporate takeover.

Tim Hardin

Corvallis OR

177. Subject: Opposition to Optum Acquisition of Corvallis Clinic

Received 1/17/24

We are adamantly opposed to the sale of the Corvallis Clinic to Optum. We understand that the Corvallis Clinic is having serious financial difficulties, but selling out to Optum is not the solution. This deal will not benefit the medical providers and staff who work there, and it will certainly not benefit the patients who need care from the Clinic.

Optum's business practices make their profit a higher priority than serving patients. This deal will only benefit their CEO and their shareholders. The doctors at the Clinic will no longer be owners with a stake in the business, they will become overworked and underpaid employees.

We do not believe Optum's empty promises that they will improve care and streamline the paperwork.

Optum has already bought the Oregon Medical Group in Eugene and the medical clinic in Everett, Washington. Since Optum acquired these companies, numerous complaints about them have been submitted to the Better Business Bureau. Billing problems and difficulties in getting appointments are the most common complaints. They routinely submit the wrong information to the patient's insurance company, submit charges to the wrong insurance company, or don't submit the charges in time. When insurance doesn't pay them because of their mistakes, they charge the patient the full amount. Trying to get the errors corrected goes nowhere. Optum then sends the bill to a collection agency, creating havoc for the patient, and making their life a living nightmare.

There is usually an exodus of doctors after Optum takes over a medical practice. This results in a shortage of providers, which makes it difficult to get appointments in a timely fashion. One person in Eugene had to wait seven months for an appointment, and they canceled her appointment the day before because of a shortage of staff, then told her she would have to wait another seven months to get another appointment.

These problems with Optum aren't limited to Washington and Oregon. The Examiner News, a paper in Westchester County, New York, has written several articles detailing the numerous problems at CareMount Medical, a clinic that was taken over by Optum. The December 11, 2023 article confirmed that a significant number of providers left, resulting in a shortage of doctors. Optum also changed their scheduling practices and required that all time slots for appointments had to be filled for several days in advance. As a result of this policy, combined with the doctor shortage, it became impossible for patients to get an appointment for an acute health problem in a short amount of time. Problems that could have been addressed in a primary care physician's office had to be treated in an urgent care or emergency room. This put a strain on the local urgent care and emergency rooms.

From the December 11, 2023 Examiner News:

"We used to be able to reserve several office visit openings a day for those that call in the morning who need a sick visit," my doctor source said. "Optum did away with this availability to be sure every single time slot possible was booked up to several days in advance, thus ensuring maximum patient visits for max profits."

In order to prevent medical providers from leaving CareMount, the Examiner News, January 15, 2023, reported on the onerous "non- compete" contract that doctors were forced to sign. The Examiner News wrote, "It stipulates that doctors (if they resign) are barred from practicing medicine within a 20-mile radius of their primary office location for three years. By extension, if you think about it, Optum is barring area patients from receiving care from their trusted local doctors, after a resignation, for three full years, and usually forever as a practical matter."

"In the event of a termination of this agreement, senior associate agrees that senior associate shall not, within the service area...of the corporation and for a period of three years following termination of this agreement, engage, directly or indirectly, as principal, owner, partner agent or employee, in the practice of medicine except as a salaried physician of an institution such as a hospital, university or public health facility, but only in administrative capacity which does not include any rendering or direct supervision of medical services," asserts the employment contract obtained by The Examiner News.

If Optum is allowed to take over the Corvallis Clinic, costs will increase and patient care will decline. They haven't improved care, administration or working conditions at any of the medical facilities they have bought out. Don't believe their empty promises. Please don't let them degrade the Corvallis Clinic.

Sincerely,

Mona Hotchkiss

178. Subject: Optum deal- concerned citizen opposed to the deal.

Received 1/17/24

Hello, I am a concerned citizen who lives in Philomath and currently uses Corvallis Clinic services. I am opposed to approving this deal.

Sincerely,

Pamela Oryshchyn

179. Subject: I oppose the Optum purchase of the Corvallis Clinic

Received 1/17/24

To Whom It May Concern,

I oppose the Optum purchase of the Corvallis Clinic. It's bad enough that all of the available health insurers are out-of-state corporations, so I don't want our local healthcare controlled by an out-of-state corporation such as Optum. Please stop this deal!

Peter Weinstein

Corvallis resident

180. Subject: Optum purchase of Corvallis Clinic

Received 1/17/24

To whom it may concern,

I am writing to register my opposition to the purchase of Corvallis Clinic by Optum. The purchasing company will have to increase profits to justify the acquisition, which almost inevitably will come from reduced quality of care (cost controls) or increased prices to patients.

Thank you for your consideration.

Sincerely,

Adam Ghozeil

181. Subject: Opposition to Optum Acquisition of Corvallis Clinic

Received 1/17/24

We are adamantly opposed to the sale of the Corvallis Clinic to Optum. We understand that the Corvallis Clinic is having serious financial difficulties, but selling out to Optum is not the solution. This deal will not benefit the medical providers and staff who work there, and it will certainly not benefit the patients who need care from the Clinic.

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These problems with Optum aren't limited to Washington and Oregon. The Examiner News, a paper in Westchester County, New York, has written several articles detailing the numerous problems at CareMount Medical, a clinic that was taken over by Optum. The December 11, 2023 article confirmed that a significant number of providers left, resulting in a shortage of doctors. Optum also changed their scheduling practices and required that all time slots for appointments had to be filled for several days in advance. As a result of this policy, combined with the doctor shortage, it became impossible for patients to get an appointment for an acute health problem in a short amount of time. Problems that could have been addressed in a primary care physician's office had to be treated in an urgent care or emergency room. This put a strain on the local urgent care and emergency rooms.

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Sincerely,

Ted Hart

182. Subject: Re: regarding Optum acquisition of Corvallis Clinic

Received 1/17/24

Dear Oregon Health Authority,

It is incomprehensible that Oregon might willingly place patients into a vice grip created by having their medical services and insurance providers both owned by unscrupulous UnitedHealthcare.

Even without the glaring conflict of interest that should prohibit this acquisition from even being considered, everyone knows what will happen if UnitedHealthcare's Optum acquires Corvallis Clinic: poorer health outcomes as staff is cut, facilities are shut down, and services curtailed.

Patients will be confronted with unexpected bills for obscure fees and denied care in case of nonpayment, and will have little recourse for correction or appeal because there will be no working, effective mechanism for it by design.

Optum will be motivated to terminate Samaritan Advantage's Corvallis Clinic contract in retaliation for Samaritan Health's recent cancellation of UHC's--due to nonpayment and abusive and arbitrarily high denial rates--and seniors will lose the benefit of being covered by one of the best plans in Oregon.

But by allowing this for-profit predator to wield power from both ends, they will, for example, further reduce quality of care by punishing staff for providing necessary care as their means of improving denial rates and reducing insurance costs. And if patients get sicker and poorer, that will be the "so what" cost of UHC business-as-usual:

maximize c-suite bonuses with impunity while patients suffer.

Optum's acquisition of Corvallis Clinic threatens to turn Corvallis and nearby communities into healthcare deserts. They will apply underhanded pressure against competing practices and non-profits like Samaritan. And increasing UHC's foothold in Oregon will further entrench an unscrupulous interest in the state's already difficult politics.

I urge you: keep them out with whatever tools you have to prevent this acquisition.

Note:

Corvallis Clinic has been my principal medical care provider for the past eight years. In the past year, one physician (out of perhaps ten) left the Internal Medicine Department where my primary physician practices, and appointment scheduling is tighter, but I have experienced no decline in service availability or quality since the pandemic started compared to before. Samaritan Advantage is my insurance provider. I am not otherwise affiliated with any of the preceding mentioned organizations, or with medical services or insurance communities, past or present.

Relevant article:

"Building a Giant", prospect.org, 2023-12-20. "Things changed after Optum took over."

Sincerely,

Corvallis, OR

183. Subject: Optum

Received 1/17/24

I am concerned about Optum buying out the Corvallis Clinic. I oppose the sale. For the past several years I have had Medicare Advantage through United Healthcare. I was so disappointed this past year (2023) in the manner in which they operated that beginning with 2024, I have chosen a Medicare Advantage Plan from different company that also contracts with the Clinic.

I am concerned that if the sale goes through, then perhaps those of us who have most of our doctors at the Corvallis Clinic will eventually be forced to change doctors, and/or choose a United Healthcare/Optum Plan. We, the consumers/patients of the ever-changing medical industry, are having to make important decisions about our well being year after year in the current system.

184. Subject: Optum

Received 1/17/24

Dear OHA,

I would like the Oregon Health Authority (OHA) to oppose a purchase of the Corvallis clinic by a health corporation called "Optum."

This corporation has what seems like a poor track record. I feel this purchase may almost certainly increase healthcare costs for all of us. The deadline for comment is tomorrow. The timing of the purchase attempt was over the holidays, some think to make it difficult for us to oppose.

Please say no to this purchase.

-Andy

185. Subject: Optum buyout of Corvallis Clinic should not be allowed

Received 1/17/24

Hello,

I am a badly disabled adult on OHP and depend on the Corvallis Clinic for my regular health needs. If the clinic is purchased by a private insurance firm, they are going to raise prices, limit OHP access, and overall make my quality of life much worse. I do not have any alternatives if this happens, which means my health will suffer significantly as a direct result of this buyout. Do not let these greedy insurance scumbags buy our clinic. They only want profit for their owners and investors, and will hurt thousands of people to get it. They don't care about the health of me or anyone else in this state.

Sincerely,

Nathan Waugh

186. Subject: Optum/Corvallis Clinic Acquisition

Received 1/17/24

To Whom it May Concern,

I oppose the acquisition of Corvallis Clinic by Optum. Recently, and taking effect this month, Samaritan Health Group terminated its contract with United Healthcare, the owner of Optum, Inc. This acquisition feels like a rushed answer to that contract termination.

Given how integrated The Corvallis Clinic's services are with Samaritan, I fear that this tension between United Healthcare (and, by extension, Optum) and Samaritan will bleed into the relationship between The Corvallis Clinic and Samaritan. The result of this tension will be degraded health care service for the people of Corvallis. Further, with Samaritan no longer considering United Healthcare in-network, many residents of Corvallis may find themselves in a situation where it is cost-prohibitive to use the local hospital for non-emergency procedures and instead need to travel to either Salem or Springfield, each over 45 minutes away.

Again, I strongly oppose this acquisition. I have not seen any evidence that this will improve the quality of care for Corvallis residents. Instead, it looks more and more like this is a way for United Healthcare to try and maintain a share of the Corvallis market by potentially limiting options for Corvallis residents.

Thank you,

Jared Clark

187. Subject: Opposed to Optum Acquisition of Corvallis Clinic

Received 1/17/24

I am very concerned about the possibility of Optum acquiring the Corvallis Clinic. I have been receiving specialized care there for post-surgical/specialized MRI's, other MRI's, Physical Therapy, Hip Issues, Foot Issues, and Rheumatology. I have appreciated the expertise I have been able to find there, with many practitioners holding an MD who have many years of experience and a commitment to their Corvallis and other Oregon patients.

I fear that the nature, quality, and availability of care will go down if a corporate buyout by Optum Oregon MSO LLC - a front for the largest health company in the US - is permitted. I have read a lot of criticism about United Health Care from patients, organizations, and legal advocates which suggests to me a disturbing trend in its policies and practices toward patients.

Also, the Clinic currently accepts my Medicare Supplement Plan provided by Oregon-based insurance MODA through PERS... as a PERS retiree, I much prefer that insurance. If I couldn't use it, I fear that my access to the kind and depth of care I need may be circumscribed.

Sincerely,

Leslie Lundborg

Corvallis

188. Subject: We VERY strongly oppose Optum buying Corvallis Clinic

Received 1/17/24

As 35+ year residents of Corvallis, Oregon, my family is scared to death that United Healthcare might buy our local medical clinics and hospital. The Corvallis Clinic cares about our community and everyone who lives in it. UnitedHealth Group is nationally notorious for routinely denying

treatments prescribed by doctors, denying claims and fighting patients and their doctors to keep every penny possible lining their pockets putting patients at risk of illness and death.

They have no care whatsoever for patients or the health of the people they supposedly represent and have demonstrated countless times that they ONLY care about making as much money as possible for themselves and their shareholders.

It took me a matter of minutes to find copious documentation of the heinous practices of UnitedHealth Group and Optum. Please don't degrade the healthcare for Corvallis, Philomath, Albany, Lincoln City and Newport.

Thank you for your time and consideration.

Mary and Jeff Clement-Hill

Corvallis, OR

189. Subject: Optum - Letter seeking rejection or delay

Received 1/17/24

CORVALLIS CLINIC / OPTUM MERGER - LETTER IN
OPPOSITION 1/17/2024

My name is Warren George. In my main career I was Director of Primary Operations for Oregon Metallurgical Corporation, one of the mid-valley's largest employers. Following that I was a business consultant with a broad range of expertise including health care and finance issues. I was a governor appointed member of Oregon's Task Force on Universal Health Care. I am providing this testimony in conjunction with the Legislative Committee of Mid-Valley Health Care Advocates.

The stated purpose of this merger according to the applicants is to solidify Corvallis Clinic's shaky finances, and to provide a buyer for current physician-owned shares. There are no identified deficiencies in health care delivery by Corvallis Clinic which are driving this merger. Since Optum and United Health Group have no history in medical philanthropy it can be assumed that their motives are not medical per se but based on financial ambitions for their own organizational expansion.

The Oregon Health Authority (OHA) is required to review this merger to understand how it could affect the cost and quality of health care, access to services, and health equity. This letter looks at several of these aspects, starting with quality of care.

As word of this unpublicized merger has begun to spread to the 260,000 people in the Corvallis Clinic service area, the number of people who are excited that their quality of care will be improved by international corporate ownership is almost certain to be zero. The reasons for concern are far from juvenile or petulant.

Quality of care has many facets but the measure which overrides all others is individualized patient satisfaction. Larger conglomerates often depend on adherence to standardized processes to manage their size, but this need for uniformity is the opposite of individualized care. In situations not involving public contagion, the uncertainty of medicine requires that patients must be given some latitude to navigate their own path through the trade-offs of medical opportunity versus medical risk, with their doctor as a trusted and trustworthy advisor.

Within the wording of the Optum application is the language of Goliath-like arrogance. After the merger, remaining physicians will be given access to Optum's corporate standardized policies and medical resources. A post-merger focus according to the application will be the mandated adherence by patients and their physicians to specific medications as determined by Optum. These words should be frightening to everyone who reads them. Mandatory standardized care is not quality care.

This merger is not about health care, it is about questions of finance and ownership. As the responsible adults of our time we must ask, "Why is the centuries-old model of provider-owned care no longer working?" and, "As the provider-owned model fades, can an investor-owned replacement model deliver affordable, universally accessible, and equitable care?" The first question is complex and should be further investigated, but the answer to the second question seems rather obvious. When private investors such as Amazon, CVS, and United Health Group "rescue" local clinics by buying them out, they only purchase practices in affluent areas, and in lucrative specialties. Thus, the investor-owned model of health care condemns all other neighborhoods and all other care specialties. If OHA approves this merger, it will accelerate future generations on a path toward economic and social calamity.

Oregon is on the cusp of new simplified billing reforms which could restore the provider-owned model to viability, or which could alternatively allow more care to be delivered within a patient-owned model.

This letter is an appeal to OHA, and to the Corvallis Clinic itself, to elevate the importance of local patient satisfaction and 100-year social aims, by either rejecting the merger, or by delaying it for comprehensive community review while other patient-friendly and society friendly ownership alternatives can be given adequate consideration. Given the public outcry and distrust of corporate medicine, the patients of the Corvallis Clinic should at least be given time to start a GoFundMe account to keep the clinic independent in the interim.

Warren George

Corvallis

Karen Christianson (Co-chair)

Alex Polikoff (Co-Chair)

Roberta Hall

Dr. Bruce Thomson

Mark Weiss

Linda Krygier

And six other signers in support.

Attachment: [Letter version of email] CORVALLIS CLINIC - OPTUM COMMENT W George.pdf

190. Subject: Corvallis Clinic Purchase

Received 1/17/24

I have been a patient of the Corvallis Clinic for more than 12 years. Formerly I was with United Health Care Systems before my family relocated here. The difference in services is huge! And I am strongly against this purchase.

Having a physician owned healthcare system in our town is critical so the community can have choices and fair healthcare instead of only what the insurance companies seem necessary. If this is approved, it will adversely affect the health of many citizens.

Also, the short timeline for community feedback is concerning....holidays and inclement weather. Why is this being pushed thru without true community involvement.

Perhaps the doctors at the Clinic made some bad financial decisions and put themselves on a tight spot....but that is no reason the community should suffer.

I appreciate your consideration.

Martha Fulford

191. Subject: Optum

Received 1/17/24

I have concerns about Optum purchasing the Corvallis Clinic. Would like to see more time for public discussion.

192. Subject: Opposition to Optum buyout of the Corvallis Clinic

Received 1/17/24

As a 20+ year resident of Corvallis, as a user of the local health care system, and as a 30-year veteran of working in Oregon's healthcare system, I am adamantly opposed to the purchase of The Corvallis Clinic by Optum/United Healthcare.

If the Corvallis Clinic is having financial challenges, the selling of the clinic to a pirate organization like Optum/United Healthcare will only make things worse for those employed and those served by the clinic. Given the history of Optum's business ethics (or lack thereof) and their profit-before-patient model, how will their ownership of the clinic improve things? Will it improve the quality of care offered to local residents of Corvallis? Witnessed by the necessity of our regional hospital (Good Samaritan Regional Medical Center/Samaritan Health Services) having to discontinue contracts with United Healthcare due to poor repayment and other issues, how can this purchase even be considered? Quality of care will suffer, as will job quality for all staff employed by the Corvallis Clinic. Buyouts and mergers are signs of the weakness and the death throes of our healthcare system. Fewer providers of a service means that those who control the service will have more power, and those who use it will have less.

Additionally, I share a unique perspective to the inner workings of Optum/United Healthcare because members of my immediate family profited greatly by their work for UnitedHealthcare and Optum, and I have seen the wealth that is generated for their upper-level employees by their miserable business practices. Six-figure incomes for upper-level sales staff and seven-figure incomes for CEOs does not align well with good pay for clinicians and high-quality coverage for those insured. Take a [look at the comments](#) by David Hart, MD about the number of Optum/United Healthcare executives making salaries over \$10,000,000. Do you think United/Optum's focus is quality patient care, provider satisfaction, or community healthcare? I think it is profit, greed, and monopolizing/controlling the healthcare market!

United/Optum takeovers haven't improved care, administration, or working conditions at any of the medical facilities they have taken over.

It is truly unethical that United/Optum is allowed throughout many states to be both an insurance provider and owner/administrator of the very healthcare facilities/providers which they are insuring.

As the Oregon Health Authority, with oversight over our health care market, please exercise your ability to stop this now. Do not allow Optum/United Healthcare to purchase the Corvallis Clinic.

Respectfully,

Wendy Byrne

Ward 5 Corvallis Oregon

Oregon Physical Therapist License #2167

193. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/17/24

No, no, no!

Please, do not approve the acquisition of the Corvallis clinic!

Health care is expensive enough, all that Optum/United Health care about is profit. Please, don't sell us down the river.

Emphatically,

Josiah Fisher

194. Subject: Optum and Corvallis Clinic

Received 1/17/24

To the Oregon Health Authority,

I appreciate the difficulty of your role as the guardian of healthcare for Oregonians. The pandemic has thrown many of our reliable healthcare providers into financial distress. Finding a solution will be difficult, I know, but that is exactly what you must do when considering whether to allow United Health/Optum Corporation to swallow up the Corvallis Clinic. The question you must ask is WHO WOULD GAIN?

Optum's business strategy operates with one purpose: profit for their shareholders. To achieve this, they must cut corners, What corners? These are obvious: reduce services, replace long-time experienced staff with cheaper personnel, minimize patient care in favor of the 'bottom line'. Given this likely scenario, many of the Clinic's most valued staff will leave, to be replaced by those willing to work for less. This outcome will not serve the patients, the medical staff, or the community. So who would gain? That, too, is obvious. And it has nothing to do with maintaining quality healthcare for Oregonians. Corvallis has already seen how Samaritan has been treated by this company, having cut its association with United Health for failure to meet its financial obligations.

As the sole protector of the well-being of the Corvallis Clinic's many patients and staff, you must not feed the gluttonous insurance company's thirst for profit at the expense of the vulnerable. We

need health care providers who put the patient's needs, not the 'bottom line', first. I urge you to find a way to continue Corvallis Clinic's long history of service to this community.

Sincerely,

Barbara Gladstone

195. Subject: Optum

Received 1/17/24

To the Oregon Health Authority:

I oppose the sale of Corvallis Clinic to Optum, which is just a branch of the UnitedHealth Group (UHG).

Surely, before you would approve the sale of the Corvallis Clinic to UHG, you ought to address the many concerns being expressed about UHG in the past few years. The two main issues appear to be UHG's plans to reduce paying claims for emergency room visits and the fact that UHG is being sued by a group of anesthesiologist for forcing doctors out of their network. In the former instance, UHG attributes high costs to the patients for overusing emergency rooms rather than to the exorbitant prices charged by hospitals. In other words, they blame the victims. In the second instance, ironically, I can remember a time when the Corvallis Clinic itself was blamed for driving out competition. The less competition, the higher the costs. And health care costs in this country are already unconscionable.

Sincerely,

Sandy Ridlington

Corvallis, Oregon

196. Subject: Re: Optum Oregon

Received 1/18/24

Thank you for your acknowledgement of my letter regarding the possibility of Optum Oregon acquiring the Corvallis Clinic. Since it seems the timeline for consideration of this issue does not allow for further investigation or deep thought, I would to register my opposition to the sale of the Corvallis Clinic to Optum Oregon. I have been generally satisfied with the services of the Corvallis Clinic, and have no reason to believe that Optum Oregon would be better. In fact, I feel confident that moving from a local to a national management company will result in lower quality health care, at a higher cost. As a clinic client, I see no advantages to making this change.

Carol Fischler

I have been a client of the Corvallis Clinic since I moved to Corvallis in 1994, taking advantage of a variety of different services.

Although I have not been 100% pleased with all services at all times, I have generally felt that the Clinic was well run, the Physicians and staff competent and concerned, and the quality of service good. Most importantly, I was happy to be dealing with a local group with a long history of medical service to the Corvallis community. To make a judgement about whether local medical services would be

improved were the clinic to be sold to a national health care chain would involve evaluating a lot more information about Optum and their plans for the clinic than is currently available to me.

I have the same questions as those that are apparently being currently investigated by OHA: how will this change "affect the cost and quality of health care, access to services, and health equity." How can the public know whether this change of ownership will improve healthcare in our area or make it worse? What have been the experiences of clients of other Optum-managed clinics? What are the experiences of physicians and staff working at other Optum-managed clinics? How does the current medical staff of the Corvallis Clinic feel about this sale? Will our doctors remain or decide to retire or move elsewhere? How can I express an opinion about this proposed change when until recently I had not even heard of Optum of Oregon. And, perhaps most importantly, WHY THE BIG RUSH? Your letter is dated December 28, and it requests response by January 18, less than three weeks later, a period that included two major national holidays, and a weather event that closed down the city for the better part of a week. Your letter offers no specific information about Optum and its plans for the Corvallis Clinic, nor any hints where such information can be found. On what basis might an opinion be formed under these circumstances? What are the arguments for and against this sale? If there are advantages for current Corvallis Clinic clients, what are they? And what are the negatives that must be taken into consideration?

I do not mean to impune the motivations of the Oregon Health Authority in soliciting opinions, but there does seem to be something seriously disingenuous about asking for opinions on a fairly specialized subject without providing any factual information on which to base those opinions. If you want thoughtful public opinion you must slow down the process, and educate the public about their choices. If, in fact, there is no choice, and the solicitation of input is just window dressing, it would save everyone a lot of time and effort if you would be clear and direct about this fact.

Carol Fischler

197. Subject: OPTUM

Received 1/17/24

Please convene a Community Review Board. It is important that quality care and access for all are priorities considered and profit is not.

198. Subject: Oppose Optum purchase of Corvallis Clinic

Received 1/17/24

Good evening Oregon Health Authority (OHA),

I do not agree with the takeover of the Corvallis Clinic by Optum. The people of Oregon did not pass Universal Healthcare only to have a mega corporation take over our clinic. I believe this will lead to higher costs, poor patient services, and profiteering, with profits leaving Oregon.

This should be an easy decision for OHA

Please do not approve this corporate takeover.

Thank you,

Amy J. Dreves

Corvallis, OR

Patient of Corvallis Clinic

199. Subject: Optum

Received 1/17/24

To the Oregon Health Authority,

I am writing to express my opposition to the purchase of the Corvallis Clinic by Optum Health and its parent company United Health Care. This huge national corporation has a long history of sacrificing the needs of patients and subscribers in order to increase its profits. Most recently we have seen this in Samaritan Health System's decision to stop accepting United Health Care's insurance products because of United's pattern of withholding payments and reducing payments for legitimate services which have been rendered. And according to the Lund Report, "The parent company faces lawsuits for, among other things, allegedly charging 'unconscionable' fees blamed for putting independent pharmacies out of business. It's recently been the subject of a series of articles in STAT, a top health care industry news publication, for allegedly using a secret algorithm to cut off care for sick and elderly patients in rehab." And for years United has been locked in legal struggles with mental health providers because of United's concerted efforts to circumvent or ignore the mandates of federal mental health parity laws, impeding access to needed mental health care for thousands of people insured by United. We can not let this unscrupulous company into our community to disrupt the provision of health care to our citizens. Thus I oppose the purchase of the Corvallis Clinic by Optum Health.

Thank you.

Ann DeLollis, Ph.D.

Clinical Child Psychology

200. Subject: Corvallis Clinic takeover.

Received 1/17/24

I am urging you to convene a Community Review Board to further discuss the merger of the Corvallis Clinic with Optum/United Health.

201. Subject: OPTUM

Received 1/17/24

To the Oregon Health Authority~~

I come to you as an enthusiastic supporter of "Health Care for All Oregon," an organization which believes that EVERY Oregonian deserves a fair and equitable health care system, free from special interests that put profits before people. You are an agency in Oregon which stands for "The

People," or at least you should be. It saddens me to have to write to you regarding the proposed merger of the Corvallis Clinic with Optum Oregon MSO. I don't understand why the OHA would ever support any special interest over the people of Oregon. Please help me understand. You have served us in many ways throughout the pandemic, and we have been grateful. So why this merger? PLEASE, do what is right for the people you serve and keep our Oregon clinics in the hands of the public, not private, for-profit businesses.

I am most hopeful that you will choose the people of Oregon and continue to serve us in the best way possible.

Thank you!

Liz Marlia-Stein

McMinnville, OR

202. Subject: Optum/The Corvallis Clinic

Received 1/17/24

Thank you for the opportunity to provide this comment.

Karen Christianson

Corvallis

Attachment: OHPB COMMENTS.docx

HCMO COMMENTS

My name is Karen Christianson and I live in Corvallis. I am a retired lawyer and a patient of The Corvallis Clinic. As you know the Clinic is being acquired by Optum MSO if the transaction is approved by the state. This acquisition has caused concern among many people. This is one of 18 transactions being reviewed by the Healthcare Market Oversight Program which was started almost one year ago.

This program has been heralded as being one of the strongest in the nation. Despite that accolade we need to review and improve the program by providing more transparency and meaningful public comment.

One aim of the program is to promote public input on mergers and acquisitions, yet notice of The Corvallis Clinic acquisition was given on Dec. 28 with a comment deadline of January 18. Especially during the holidays this is not an adequate amount of time for meaningful analysis and comment. The second barrier to meaningful public comment is the amount of redaction in the application. Exhibit A, which was referred to in response to the questionnaire was almost entirely redacted even when some of the requested information such as the number of care providers was available on clinic websites. This lack of transparency is disheartening at best. Modifications to administrative rules and statutes could improve this.

Dave Baden, interim director of OHA testified before the Senate Healthcare Committee on Nov. 6 that consolidation and merger can negatively impact Oregonians in several significant ways including higher personal spending on

healthcare, higher costs for employers which slows wage growth, fewer choices for obtaining care, fewer opportunities for healthcare employment, and some communities experiences disparate impacts.

This is an important application that will impact patients and providers in a three-county area reaching from the Coast to the Cascades. There should be a more robust and meaningful opportunity for public comment. In the immediate case I would ask that a Community Review Board be established under the criteria for such boards by HCMO. The goal of the oversight program is to achieve health equity and equitable access to care for the people of Oregon.

The Corvallis Clinic Merger is just a symptom of the failings of the current system. The Corvallis Clinic is under financial stress according to their application and we need to keep these care providers in our communities, however, careful consideration must be given to whether Optum, which is owned by United Health Care is the best option for the community. I do not believe that it is based on the limited information that is presently available.

203. Subject: OPTUM

Received 1/17/24

Greetings,

I am writing to urge you to stop the proposed merger of Corvallis Clinic and United Health Group/ Optum.

Common sense and prior examples have demonstrated that mergers of for-profit corporations with health care do not make for good health care outcomes.

The two groups have completely different motivations.

I urge you to do the right thing.....someday you or your loved ones will need healthcare and you don't want those medical decisions based on "best business practices."

I hope there will be a comprehensive community review board to review this merger.

Thank you,

Ann Turner

204. Subject: My Comment to OHA regarding Optum buyout of Corvallis Clinic

Received 1/17/24

To: Oregon Health Authority

The description of what OHA provides for the citizens of Oregon, which includes your vision and mission statements and all that you do, is provided on your website. The current issue of Optum's proposal to buyout Corvallis Clinic will be a litmus test to see if you actually know how to live up to all of your website proclamations. This is not just a problem for the doctors, medical staff, and patients of Corvallis Clinic to deal with, it is a problem for everyone in Oregon, including everyone from the OHA who will have a hand in the decision making, because we all need quality medical care, including you.

Optum has already been allowed into Oregon and provides administrative and management services to three entities in this state. Not only is there a lot of information available throughout the United States which demonstrates concerns about Optum's business practices in other states, but you have three entities operating right here within the state. I pray that you will not turn this into an easy slam dunk for Optum. You have the responsibility and the requirement of accountability to conduct an objective review of these three entities. This includes conducting surveys and soliciting comments from the public, doctors, and medical staff to find out just how things are going. Based on people I personally know who are patients that have been affected by Optum, if you make a sincere effort and keep your eyes and ears open, you will be learning a lot about how Optum (and United Health Care) has been operating here in Oregon.

I am pleading with you to do your job. I've read the 114 public comments that you posted on your website (dated Jan 12, 2024). It's easy to see there are 114 very sincere, concerned people who are pleading with you to stop the buyout. Each one of them provide very specific details of why they are concerned. I agree with all they are saying and I don't think I can add any more value to what they have already said. I agree, do not approve the Buyout!

OHA got off to a very questionable start. Your Health Care Public Market Oversight document which announces the proposed buyout and gives the public the opportunity to comment is dated December 28, 2023. The comment period ends January 18, 2024. This is a very short period of time, especially considering it fell over the busy holiday season. I am very curious what your current date is for making a decision. I am curious to have you provide the results of your due diligence to evaluate the track records of how Optum is doing in Oregon to date. In other words, we all just want to know that you are doing your jobs according to what you have posted on your website:

OHA will transform the health care system in Oregon by:

- Improving the lifelong health of Oregonians
- Increasing the quality, reliability, and availability of care for all Oregonians
- Lowering or containing the cost of care so it's affordable to everyone.

I am confident that if you hold yourselves accountable to fulfill your obligations to the State of Oregon, enough evidence will emerge to compel you to not approve the buyout.

I rest my case,

Denise R.

205. Subject: Optum Oregon MSO and Corvallis Clinic

Received 1/17/24

Hello,

I am writing as a Philomath resident with original Medicare and a MODA coinsurance who has been a patient with the Corvallis Clinic since 1988. I am committed to the Corvallis Clinic and believe they provide excellent care and have top quality physicians. Their coordinated approach with all physicians and services such as lab, x-ray etc in 2 buildings is fundamental in their provision of quality care. My concerns about Optum Oregon come from lack of knowledge about

how this will impact me and other seniors who choose not to select an advantage plan. Can you answer the following questions:

1. How will Optum approach Medicare with Medigap insurance plans. Last year the Corvallis Clinic was encouraging their patients on Medicare to switch to an Advantage Plan and mentioned they might not be able to accept original Medicare in 2024. I believe this was a financial issue. I called the Business office this December and found out they were still taking Medicare with Medigap this year. Will Optum continue to see Medicare patients who are not on an Advantage plan? I have concerns about Advantage plans for two reasons. One is the delay often reported in the referral approval process and the risk of the denial of services. I believe physicians not health insurance entities should decide what their patients need. See the articles below.

<https://www.samhealth.org/about-samaritan/news-search/2023/09/13/samaritan-terminates-contract-with-united-healthcare>

<https://jamanetwork.com/journals/jama-health-forum/fullarticle/2792414>

2. The physicians at the Clinic took a 15% pay cut during the pandemic which hit them hard. I know this is not likely but is there not a way they can receive a state grant to support them and help them out of a situation that forces them to choose Optum?

3. Once a decision is made how will patients be notified? If Optum is the only way the Clinic can survive then I would have to accept that rather than closing the clinic.

On a different note if you have any input on the Medicare reimbursement rates for physicians I would definitely push for that. How can a physicians practice stay independent when all these baby boomers are using their services for such limited reimbursement rates! Each year they try to cut the rates more. I know this is probably an issue to bring to the attention of our senators but please in your role as a health authority advocate for that if you can.

<https://www.ama-assn.org/about/leadership/medicare-physician-payment-reform-long-overdue>

Finally thank you for the oversight services you provide in our state and for the exceptional up to date information you provided during the pandemic, You were a source of light during a dark pandemic.

Best wishes, Inge Daeschel

206. Subject: Optum comments

Received 1/17/24

Good morning folks,

I was very surprised to learn that the doctors of Corvallis Clinic were putting their business up for sale. It is also very disturbing to hear that UHC/Optum is considering buying Corvallis Clinic and reorganizing it to better fit their business model.

UHC is widely criticized for apparently fraudulent practices in their Medicare Advantage offerings (a)(b) which resulted in overbilling CMS and denying coverage to seniors.

The ongoing consolidation of health care options by large companies also reduces the quality of the health care we are provided with (c). It is also reducing our options for using the pharmacies

and physicians and therapists we have used for years and trust. This year, my corporate insurance changed and will no longer work with our neighborhood pharmacy (Rices in Corvallis is not part of Express Scripts).

Please deny the sale of Corvallis Clinic to UHC/Optum for the good of our health in the midvalley. Thank you.

Curt Seeliger

Corvallis OR

a: <https://www.nytimes.com/2022/10/08/upshot/medicare-advantage-fraud-allegations.html>

b: <https://www.npr.org/sections/health-shots/2022/11/21/1137500875/audit-medicare-advantage-overcharged-medicare>

c: <https://arstechnica.com/health/2024/01/hospitals-slash-staff-services-quality-of-care-when-private-equity-takes-over/>

207. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/17/24

Dear HCMO representatives,

I'm writing to request that you perform a comprehensive review of the proposed Optum/United Health acquisition of the Corvallis Clinic.

My primary physician and other doctor's that provide my health care services are part of the Corvallis Clinic.

I'm concerned about changes in costs, access to doctors, and quality of care if the current standards of this smaller scale clinic change into a corporate model.

Thank you in advance for you diligence in helping maintain and improve healthcare access in Oregon.

Dave Chiller

Corvallis, OR

208. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/17/24

To whom it may concern:

I am writing to ask OHA to evaluate and put the brakes on United Health's merger with the Corvallis Clinic. This community has already been negatively impacted by United health's poor service resulting in Samaritan health non renewal of their contract with United. In other words, they have proven to be difficult to work with. It is already very difficult to find care in this community. Allowing a buyout of the Corvallis Clinic would only narrow our choices, remove local interest, and most likely, create a profit driven decline in service.

Thank you,

Julie Masters

Corvallis, OR

209. Subject: Optum

Received 1/17/24

To whom it may concern,

Hello, as a client of Corvallis Clinic, I am writing to express my concerns about Corvallis Clinic to be purchased by Optum Oregon (United Health).

I value the Corvallis Clinic Physicians' ownership and operation of the clinic. I value local community health care providers over a large health care corporation like Optum Oregon/United Health.

As a local Corvallis Resident, I deserve to have an input/say in the future of my health care team.

I urge you to allow for a public review of this proposed ownership transition and to include Corvallis Clinic's clients in the process.

Looking forward to a public hearing of this matter.

Sincerely,

Zuzana Vejlupkova

210. Subject: Optum

Received 1/17/24

I am opposed to the Optum merger with the Corvallis Clinic. The merger will diminish the quality and availability of services as well as the kind of tiered financial access that can be navigated. The reason we have reviews and hearings is because this is often a poor deal for the health care consumer. The quality of care in Corvallis is above average especially for a community this size, we need to cherish and protect this fragile ecosystem from those focused on profit margins and all reductive thinking when it comes to our health care.

Thank You,

Julie Wasmer

Corvallis resident

211. Subject: Optum

Received 1/17/24

I oppose this takeover!

Glendora Claybrooks

212. Subject: Do not let Optum buyout proceed

Received 1/17/24

To whom it may concern,

This is my second comment requesting that you do not allow the Optum buyout to proceed. Here is a short video illustrating the advantages of providers like Corvallis Clinic over those like Optum. The video is less than two minutes long. Please watch.

<https://www.youtube.com/watch?v=Mq0gtxi-FR8&list=PLpMVXO0TkGpdvjujyXuvMBNy6ZgkiNb4W&index=11>

213. Subject: acquisition of The Corvallis Clinic by Optum Health

Received 1/18/24

Members of the HCMO group:

I am opposed to the HCMO allowing the acquisition of The Corvallis Clinic by Optum Health of the UnitedHealth Group. My reasons are as follows.

I strongly doubt that the motive of Optum Health in seeking to acquire The Corvallis Clinic is to improve healthcare services and to reduce denials of insurance coverage for the services. I strongly suspect that instead the motives are growth and profit. Optum Health is likely to increase the revenue stream from the resources of what is now the Corvallis Clinic by increasing denials of insurance coverage and increasing delays for service based on the type of insurance that a patient has.

These policies would almost certainly entail a worsening both in the availability of healthcare services and in the costs that patients would be required to pay for the services. Because I expect that an acquisition would lead to such worsening of healthcare services, I ask the HCMO to deny the petition of The Corvallis Clinic and Optum Health.

I worry that healthcare in our country is on the whole worsening, and I implore you not to add to that worsening. I think that mendacity in the various healthcare industries is more pernicious than mendacity in other industries because it leads more directly to people suffering and to people dying.

Sincerely,

Charles Harvey

214. Subject: Optum offer to buy Corvallis Clinic

Received 1/18/24

Greetings:

I appreciate the opportunity to voice my opinion on Optum / United Healthcare's offer to buy Corvallis Clinics. By way of background, I have been a patient at Corvallis Clinic for many years, and also have been covered for years by a Medicare Advantage policy from AARP/United Healthcare.

I have been very pleased with the services I have received from both providers. However, I believe very strongly that the proposed buyout will inevitably reduce the quality and availability of care I've been used to at Corvallis Clinic. We've seen, time and again, that consolidation and "vertical integration" in a business or industry increases pressures to go for return to shareholders over all other considerations.

I oppose this proposed buyout. I believe it would be bad for me, personally, and a tremendous loss to the Corvallis-area community that has been so well served by the Clinic for many years.

Thank you for your consideration.

Andrea G. Dailey

Corvallis, OR

215. Subject: Optum

Received 1/18/24

The purpose of this email is to express our objection to the proposed merger of the Corvallis Clinic with Optum, a company owned by United Healthcare. We feel this merger would have a significant negative impact on the quality and delivery of health care in the mid valley based on the history of similar mergers across the United States.

Please institute a Comprehensive Community Review Board process regarding the proposed merger.

Thank you, Judy and Terry Hill

216. Subject: OPTUM

Received 1/18/24

As a long time Oregonian I want to express the need to move cautiously on these

Medical group mergers. More review is needed and more public input is certainly needed. I am NOT in favor of selling out to out-of-state buyers. Why should we give away our authority????

Hermina Kann

McMinnville, Oregon

217. Subject: Re: OPTUM, the Corvallis Clinic

Received 1/18/24

I just now sent an email to you regarding my strong opposition to United Healthcare taking over the Corvallis Clinic but I forgot to include OPTUM in the subject line.

We don't need another private equity firm taking over in our community! Please deny this application/buy-out.

Thank you very much.

Rebecca Sherman Geier

Corvallis OR

I'm writing to ask the Oregon Health Authority to deny United Healthcare's takeover of the Corvallis Clinic. My family has used the Corvallis Clinic for over 20 years and appreciate that it is locally owned with medical providers and staff living in our community.

We really don't need another private equity firm taking over more businesses in this community! Please consider this carefully and deny the application/buyout of the Corvallis Clinic.

Thank you very much.

Rebecca Sherman Geier

Corvallis, OR

218. Subject: Acquisition of Corvallis Clinic

Received 1/18/24

Members of the HCMO group:

I am opposed to the HCMO allowing the acquisition of The Corvallis Clinic by Optum Health of the UnitedHealth Group.

Oregon is now moving toward a healthcare system that will cover all residents at less cost than the present system with its layers of intermediaries. Allowing the locally organized Corvallis Clinic to be bought out by a subsidiary of the mammoth United Health Group would make healthcare for all in Oregon even more difficult to attain.

Louise Ferrell, Corvallis OR

219. Subject: letter in opposition

Received 1/18/24

Dear hcmo board,

I am vigorously opposed to the sale of the Corvallis Clinic to Optum, a division of United Health Care.

I have been exposed (and am familiar beyond) to their individual style regarding claims on a larger basis than that of an individual consumer.

That style represents failure to address health concerns, I believe it risks outcomes---causing an increase in illness and mortality.

They are bad news for Corvallis and the surrounding tri-county region.

I believe other alternatives should be explored on a state-wide basis. This is the tip of the iceberg.

John Watson MD

220. Subject: Opposition to acquisition of Corvallis clinic by Optum Health Care

Received 1/18/24

Members of the HCMO group:

I am opposed to the HCMO allowing the acquisition of The Corvallis Clinic by Optum Health of the UnitedHealth Group. My reasons are as follows.

Already, the other large medical provider in Corvallis, Samaritan Health Services, has stated that they will not accept United Health Care as a primary insurer. Among their reasons is the high denial rate of UHC.

I strongly doubt that the motive of Optum Health in seeking to acquire The Corvallis Clinic is to improve healthcare services and to reduce denials of insurance coverage for the services. I strongly suspect that instead the motives are growth and profit for themselves. Optum Health is likely to increase the revenue stream from the resources of what is now the Corvallis Clinic by increasing denials of insurance coverage and increasing delays for service based on the type of insurance that a patient has.

These policies would almost certainly entail a worsening both in the availability of healthcare services and in the costs that patients would be required to pay for the services. Because I expect that an acquisition would lead to such worsening of healthcare services, I ask the HCMO to deny the petition of The Corvallis Clinic and Optum Health.

I worry that healthcare in our country is on the whole worsening, and I implore you not to add to that worsening.

Thank you for your consideration of my perspective.

Manuela Huso

Corvallis, Oregon

221. Subject: Optum Oregon MSO & the Corvallis Clinic

Received 1/18/24

Good Day:

I have concerns about the proposed acquisition of the Corvallis Clinic by Optum Oregon MSO, LLC. I shudder to think that this giant corporation will be the administrating board for the Corvallis Clinic. I fear service and care, which are already declining, will become untenable for patients. Not to mention the increase in costs that will become lumped with a broader range of facilities from areas that may have higher cost of living. I am fortunate to have had the same primary care physician for several years, (a rarity), and am loath to jeopardize the likelihood of her continuing with the clinic. I already dread the phone queue when I call the clinic and am dumbfounded by the lack of doctors and supporting personnel, which translates into longer wait times to be seen. Once the clinic becomes overseen by a big managing organization like Optum Oregon MSO, costs for services will inevitably be increased and administrative procedures will become more complicated and drawn out. I am currently trying to find a primary for my mom, but there are no geriatric physicians accepting new patients in Corvallis. I fear the loss of accountability from a large company due to my current dealings with UHC regarding in-home care. My ninety-three year old

mother has a Medicare/United HealthCare advantage plan that is anything but advantageous. After a fall that resulted in a hospital stay mom was denied rehab. I was told by a UHC rep that in-home care was covered and provided a list of in-network providers. However, after making numerous calls I learned that only licensed nursing care requiring a doctor's order was covered in the home. The more inclusive, more convenient coverage mom was promised through UHC has not been in evidence for us; I have had multiple issues with prescription coverage as well. The lack of concern for elderly patients is stunning. Not only is it impossible for my mom to understand the forms, guidelines, policies, etc. but, trying to obtain information on the phone requires endless patience. A new management company that has no local ties to our community at the helm of local health care is not appealing. The idea of raising prices for the growing senior population who are on a fixed income for something as critical as health care is terrifying. Please give this proposed acquisition careful and thorough scrutiny.

Thank you,

Chris Fagin

222. Subject: UnitedHealth/Optum

Received 1/18/24

Oregon Health Authority,

Concerning the UnitedHealth Group wanting to buy the Corvallis Clinic, my husband and I are very worried that the quality of care will be inadequate and based on a lucrative profit.

My family feels truly lucky we have had the services of the Corvallis Clinic for over 50 years. The team of personable doctors, nurse practitioners and staff at the clinic have helped delivered our three sons, they have performed needed operations, used their skills to diagnosed our medical problems and even held our hand thru difficult times.

Loosing the Clinic to UnitedHealth/Optum would be a disaster for our community. Considering their reputation for making decisions for the enrichment of their stock holders and not their patients demonstrates that they can't be trusted to provide consistent, good quality health care to our community.

Sadly, I do understand why the clinic is considering this move. We are also encouraged to know that our Oregon legislators wisely put in place Oregon's merger review process. If the Corvallis Clinic does fall into the hands of UnitedHealth, we really hope and expect that the Health care Market Oversight Program will protect the medical needs of people of Oregon.

Thank you

Rita and Warren Jordan

South Beach, Oregon

223. Subject: Optum and Corvallis Clinic

Received 1/18/24

Members of the HCMO group:

We, my wife and I, oppose HCMO allowing the acquisition of The Corvallis Clinic by Optum Health of the UnitedHealth Group. Optum Health seems more driven by money than improving healthcare services.

These policies are likely worsen both the availability of healthcare services and the costs that patients would be required to pay for the services. Please deny the petition of The Corvallis Clinic and Optum Health.

James Gau & Maxine Eckes

224. Subject: Optum purchase of Corvallis Clinic

Received 1/18/24

Members of the HCMO group:

I am opposed to the HCMO allowing the acquisition of The Corvallis Clinic by Optum Health of the UnitedHealth Group. My reasons are as follows:

- I can't see Optum Health acquiring The Corvallis Clinic as a move to improve healthcare services and reduce denials of insurance coverage for the services. They would not be purchasing if they thought it was going to be a money drain.
- Optum Health is likely going to play the traditional game to increase the revenue stream from the resources of what is now The Corvallis Clinic by increasing denials of insurance coverage and increasing delays for service based on the type of insurance that a patient has.
- Moving ownership and oversight of the clinic to an out-of-state entity means the clinic would no longer need to answer to Oregon regulations.
- Any profits that would come from the clinic now move those monies out of our locale, out of our state.

Access to health care – both timeliness and positive outcomes - in our country continues to worsen and our costs are exorbitant. I sincerely request that HCMO deny Optum from acquiring The Corvallis Clinic. Keep Optum and its greed game out of Oregon. HCMO needs to prioritize Universal Healthcare set up for all of Oregon.

Respectfully,

Laura Relyea

225. Subject: Opposed to Optum Health acquisition of Corvallis Clinic

Received 1/18/24

Members of the HCMO group and Rep. Rayfield,

I am opposed to the HCMO (Health Care Market Oversight commission) allowing the acquisition of The Corvallis Clinic by Optum Health of the UnitedHealth Group. My reasons are as follows.

I strongly doubt that the motive of Optum Health in seeking to acquire The Corvallis Clinic is to improve healthcare services and to reduce denials of insurance coverage for the services. I strongly suspect that instead the motives are growth and profit for themselves. Optum Health is

likely to increase the revenue stream from the resources of what is now the Corvallis Clinic by increasing denials of insurance coverage and increasing delays for service based on the type of insurance that a patient has.

These policies would almost certainly entail a worsening both in the availability of healthcare services and in the costs that patients would be required to pay for the services. Because I expect that an acquisition would lead to such worsening of healthcare services, I ask the HCMO to deny the petition of The Corvallis Clinic and Optum Health.

I worry that healthcare in our country is on the whole worsening, and I implore you not to add to that worsening. I think that mendacity in the various healthcare industries is more pernicious than mendacity in other industries because it leads more directly to people suffering and to people dying.

Sincerely,

Marjorie Stevens

Corvallis OR

226. Subject: Optum Health take over of Corvallis Clinic

Received 1/18/24

Members of the HCMO group:

I am opposed to the HCMO allowing the acquisition of The Corvallis Clinic by Optum Health of the UnitedHealth Group. My reasons are as follows.

I strongly doubt that the motive of Optum Health in seeking to acquire The Corvallis Clinic is to improve healthcare services and to reduce denials of insurance coverage for the services. I strongly suspect that instead the motives are growth and profit for themselves. Optum Health is likely to increase the revenue stream from the resources of what is now the Corvallis Clinic by increasing denials of insurance coverage and increasing delays for service based on the type of insurance that a patient has.

These policies would almost certainly entail a worsening both in the availability of healthcare services and in the costs that patients would be required to pay for the services. Because I expect that an acquisition would lead to such worsening of healthcare services, I ask the HCMO to deny the petition of The Corvallis Clinic and Optum Health.

I worry that healthcare in our country is on the whole worsening, and I implore you not to add to that worsening. I think that mendacity in the various healthcare industries is more pernicious than mendacity in other industries because it leads more directly to people suffering and to people dying.

Sincerely,

Stefanie Breder

227. Subject: Proposal by Optum Health to acquire the Corvallis Clinic

Received 1/18/24

I ask that you please direct the Health Care Market Oversight Commission to deny the petition by Optum Health of the UnitedHealth Group to acquire the Corvallis Clinic.

Health care management companies very likely to be motivated primarily by profits rather than the well-being of patients. I fear that Optum Health would only continue that trend with increased denials of insurance coverage delays for service based on insurance limits, and increased costs that patients would be required to pay for services.

Sincerely,

Jack Elder, Corvallis

228. Subject: OPTUM-Corvallis Clinic Buyout-Public Comment

Received 1/18/24

We are opposed to the merger of the Corvallis Clinic and Optum Oregon/United Health, and we urge OHA to decline approval for this buyout. We are retired residents in Corvallis with both Medicare and private insurance. We depend on the Corvallis Clinic for our primary care and other health care service needs. We are concerned about the negative impacts of the merger on access to healthcare services for us and others. Increased costs, delays in receiving care, and denial of services, procedures or medications have been reported by numerous clients, doctors and other staff who have experienced Optum takeover of local clinics in Oregon, Massachusetts and other states. Following these mergers, clients reported cancellations of long-scheduled surgeries and appointments, loss of many primary providers and specialists from the clinics, and loss of other essential services. Many of the doctors and providers that left had long-standing practices and were trusted providers for seniors and families who now find it hard to find new providers and get scheduled in 'downsized' or consolidated practices following mergers with Optum/United.

Our family has already been affected by Samaritan Health Services' recent decision not to renew their contract with UnitedHealthCare (UHC) insurance company's Assisted Living Plan, which is utilized by our 95 year-old mother and many other residents in her facility for years. We were faced with having to change her insurance plan with little notice or assistance from UHC in answering our questions. We see this as another indication of the service impacts that would come from UnitedHealth/Optum buyout of Corvallis Clinic.

In sum, we are extremely concerned that approval of this merger will result in reduced access to more expensive health care, thereby increasing health inequities in our community. We believe that in approving this merger without further analysis and public engagement, OHA risks failing to uphold Oregon's recent constitutional amendment regarding access to affordable equitable health care as a right for all Oregonians.

Sincerely

Jeff and Lesli Uebel

Residents of Corvallis

Patients of the Corvallis Clinic

229. Subject: Optum and Corvallis Clinic merger

Received 1/18/24

Dear HCMO Commission,

Attached is my public comment for the merger of Optum and Corvallis clinic.

Thank you,

Cheryl Lohman

Corvallis resident and healthcare consumer

Jan 18, 2024

Members of HCMO comission,

I am strongly opposed to the current proposed merger of the Corvallis Clinic with Optum Oregon MSO. The likely result of the merger would be increased costs and poorer healthcare outcomes for our communities.

I support the state of Oregon living up to the recent amendment of Oregon constitution, as voted on by the voters in Oregon in 2022, regarding access to affordable equitable health care for all in Oregon.

I oppose all mergers of medical groups in Oregon to out-of-state national corporations whose goal is to maximize profit at the expense of our health care.

Medical mergers and acquisitions are the leading cause of escalating health care costs.

There are other reasons to oppose this merger. Optum Oregon MSO is owned by Optum, Inc., which in turn is owned by UnitedHealth Group Inc. (UHG). UHG has a decades-long history of fraud and abuse. For details, read the October 8, 2022, New York Times article, "The Cash Monster Was Insatiable. How Insurers Exploited Medicare for Billions." UHG was at the top of the list for being accused of fraud. UHG controls over one-fourth of the health insurance market.

Additionally, In the past 6 months, two large hospital systems in Oregon have notified UnitedHealth Group that they are no longer accepting patients that have Medicare Advantage insurance through UnitedHealth Group. It speaks loudly of the dissatisfaction that these two large health systems have experienced in dealing with UnitedHealth Group.

I urge you to deny this merger.

Sincerely,

Cheryl Lohman

Corvallis resident and healthcare consumer

230. Subject: Do not approve Optum

Received 1/18/24

Dear members of the HCMO group,

2/6/2024

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I am opposed to the acquisition of The Corvallis Clinic by Optum Health of the UnitedHealth Group. Optum Health is seeking to acquire The Corvallis Clinic for profit and not for improved health of Oregonians.

Please deny the petition of The Corvallis Clinic and Optum Health. Please preserve the status quo of our local healthcare by not approving this change.

Sincerely,

Meredith Williams

Corvallis, OR

231. Subject: OPTUM (buyout of Corvallis Clinic by United Health care)

Received 1/18/24

Please block the acquisition of the Corvallis Clinic by Optum, a subsidiary of United Health Care. This acquisition is detrimental to the interests of Oregon residents in the Mid-Willamette Valley.

Recent investigative journalism nationwide has documented how these profit-seeking, private-equity corporations lead to disastrous consequences for local communities, and to patients who fall victim to their predatory billing practices. If OHA allows this takeover, the damage to local healthcare options will likely be permanent and irreversible.

Yours sincerely,

Joel Geier, Ph.D.

Rural Benton County resident and Corvallis Clinic patient

232. Subject: Optum/Corvallis Clinic

Received 1/18/24

I have been patient at the Corvallis Clinic for nearly 30 years and have huge concerns about this buyout. I do not want my physician-owned healthcare provider to be taken over by a huge faceless corporation who's main concern is profit. I DO NOT support the Optum buy out of The Corvallis Clinic.

Mark Staben

Corvallis, OR

233. Subject: Optum Corvallis

Received 1/18/24

Re: OPTUM/Corvallis Clinic

This letter is to express the most serious concern of my wife and myself, regarding the pending relationship between Optum and the Corvallis Clinic. We have been Medicare patients at The Clinic for well over 10 years. It is frightening to think about our care decisions being made by guidelines and protocols. A while back, there was a lot of talk about patient-centered care. How does that fit in here?

1. If the Clinic is losing money, why would an outside business want to buy it? How will they profit?

2. Has the outcome of a similar endeavor with the Oregon Medical Group in Eugene been fully evaluated? I have been told the Oregon Medical Group has experienced a 25% exodus of physicians.

3. How will availability and acceptability be affected? Most importantly how will quality be impacted? (The Clinic has many of the finest physicians in the region and we can't lose them)

* 4. What other evaluations or consultations has the clinic considered to solve its problems?

Physicians are very bad business people (this is good) and maybe

there's a way we can help them. Healthcare is local, and it doesn't make a lot of sense for our healthcare dollars to go to shareholders remotely

Tens of thousands of people will be affected by this. Patients, their providers, and all of the employees who make things go. And everyone else. Are we just grains of sand put in a bag lobbed to a bidder?

• Thank you for considering these issues. There are many other factors that are occurring, but I think this is enough to focus on for now

Best Regards,

Norm Castillo

234. Subject: The acquisition of Corvallis Clinic by Optum

Received 1/18/24

I am opposed to the HCMO allowing the acquisition of the Corvallis Clinic by Optum.

Optum Health is likely to increase its revenue stream from the resources of the Corvallis Clinic by denying insurance coverage and delaying service based on the type of insurance a patient has.

I expect that an acquisition would lead to worsening of healthcare services. I ask the HCMO to deny the petition of the Corvallis Clinic and Optum Health.

Mary Youmans

235. Subject: Optum acquisition of Corvallis Clinic

Received 1/18/24

Members of the HCMO group:

I echo the opposition of Charles Harvey who wrote to you as follows:

Members of the HCMO group:

I am opposed to the HCMO allowing the acquisition of The Corvallis Clinic by Optum Health of the UnitedHealth Group. My reasons are as follows.

I strongly doubt that the motive of Optum Health in seeking to acquire The Corvallis Clinic is to improve healthcare services and to reduce denials of insurance coverage for the services. I strongly suspect that instead the motives are growth and profit for themselves. Optum Health is likely to increase the revenue stream from the resources of what is now the Corvallis Clinic by increasing denials of insurance coverage and increasing delays for service based on the type of insurance that a patient has.

These policies would almost certainly entail a worsening both in the availability of healthcare services and in the costs that patients would be required to pay for the services. Because I expect that an acquisition would lead to such worsening of healthcare services, I ask the HCMO to deny the petition of The Corvallis Clinic and Optum Health.

I worry that healthcare in our country is on the whole worsening, and I implore you not to add to that worsening. I think that mendacity in the various healthcare industries is more pernicious than mendacity in other industries because it leads more directly to people suffering and to people dying.

Sincerely,

Jane C. Davis

236. Subject: United Health

Received 1/18/24

I write to express to you my deeply felt concern and alarm regarding the pending merger between the Corvallis Clinic, PC, and United Health. I have had many experiences with UH in recent years while handling the affairs of an elderly gentleman for whom I served as legal guardian. UH has demonstrated itself to be about as difficult an insurance company as I have ever encountered. They are not helpful. Quite the contrary, they obfuscate, delay, force undue work, delay, give conflicting information, delay, and also delay. I should note that many providers in Corvallis have served notice this last year of their intent to drop UH from their service. I am very, very troubled at this impending prospect of a merger. This serves no one except the corporate offices, and not in the interest of Oregonians who need health services. I object to this possibility in the strongest possible way.

Respectfully,

Dr. Michael Beachley

Corvallis, OR

237. Subject: UHS take over of Corvallis Clinic

Received 1/18/24

I have grave concerns about the quality, practices and ethics of UHS. There proposed take over of the Corvallis Clinic gives me great concern for the continued good services we have received from The Corvallis Clinic. Is there anything that can be done about supporting the clinic so it does not have to go to UHS for support.

Concerned citizen

Sigrid M. Shepard

238. Subject: Optum, proposed merger

Received 1/18/24

Hello Oregon Health Authority

Briefly, I urge you to reject the proposed buy-out of Corvallis Clinic by the Optum MSO and keep health care in the local control of the doctors at Corvallis Clinic.

Echoing opinions expressed in the Gazette Times, the charter of doctor-owner Corvallis Clinic is to have local control of the services provided to their community. The goal of a private equity firm is to increase profits. It is hard to imagine how profit-making decisions from an private equity firm (not a doctor-lead firm), operating at a national level, will improve the health care to individuals in Oregon.

Whether it is the airline industry, internet providers or health care providers, eliminating local options to consolidate into profit-making, centrally-organized conglomerates does not help the consumer. I urge you to reject the buy-out

Sincerely yours,

Charles Dupuy

PS I have been a satisfied patient of Philomath Family medicine / Corvallis Clinic for nearly 30 years.

239. Subject: OPTUM

Received 1/18/24

I would like to see a Comprehensive Review Board Process regarding the proposed Corvallis Clinic merger.

Kathleen Bartee

240. Subject: Optum

Received 1/18/24

To the Oregon Health Authority:

I have been a patient of The Corvallis Clinic for the entire 41 years that I have had the pleasure of living in Corvallis. I am concerned about the potential changes to The Clinic should Optum buy it.

In its HCMO, Optum states that it will "enhance the present level of services" and lists details on how it would do that. I can only hope that their actions will do as they say and improve services for patients and encourage doctors to remain in Corvallis.

Will there be any layoffs of support staff? Will there be more pressure on doctors to work longer hours? Will there be an increase in the fees that are charged? Will there be a decrease in the treatments and tests that they use? Will they accept Medicare patients?

I worry about an outside company, whose purpose is making money for investors, coming in and taking over. Will they really be looking to raise the quality of health care in Corvallis or be looking only at their profits?

Sincerely,

Julie Arrington

241. Subject: Optum & Corvallis Clinic

Received 1/18/24

I am a patient of the Corvallis Clinic for two specialty doctors. I am deeply concerned about Optum/UnitedHealth Group takeover of the Corvallis Clinic. I researched this company and its subsidiary online and I can find only negative reviews: 1 of 5 stars on TrustPilot, "F" grade from the Better Business Bureau, etc. Reading reviews from patients, I see words like "horrendous", and "unacceptable service". I see complaints of unresolved double billing and prescription errors. I see complaints of doctor's prescriptions overridden.

I've spoken with a friend in Los Angeles advising never to use an Optum facility - long waits, understaffing to the point of incompetence and overbooked doctor visits shortened to mere minutes.

I have great fear that the Corvallis Clinic will be run into the ground by this take over.

Sincerely,

K Lars Lohn

242. Subject: Optum

Received 1/18/24

As a patient of Corvallis Clinic I would like to state my objection to the buyout of Corvallis Clinic by Optum/ UnitedHealth Group.

Besides the resulting lack of competition in the area, especially after Optum's purchases in Eugene and Portland, I feel that the purchase of medical facilities by an insurance company is a conflict of interest. With access to patients' records, the insurance company that decides who does and doesn't get care will make decisions for a bigger profit every time. UnitedHealth has already shown this with the use of their algorithm to deny people care. This is NOT in the best interest of patients.

Monopolies never benefit the consumer, and patients should not be treated as consumers. Healthcare is a right that should be accessible to everyone, and patients should have choices.

Thank you,

Lisa Haag

243. Subject: Optum buying Corvallis Clinic

Received 1/18/24

I am writing to express my concern about Optum purchasing the Corvallis Clinic. I am a patient of Corvallis Clinic and have no desire to see them struggling financially. I do have huge concerns about this mega health care company affiliated with United Health Care which is no longer in network for our regional hospital system, Samaritan Health Services. What does this potentially mean for my ability to access a hospital as an in network patient? This merger would put a health care giant in control of my health care. Please do not approve this merger. I hope that Corvallis Clinic will find a more patient friendly company to sell to or other strategies to remain viable and preserve the quality of care that they provide to their patients.

Sincerely,

Jill Irwin

Corvallis, OR

244. Subject: OPTUM

Received 1/18/24

Re: The Lund Report article Jan. 2, 2024

Health care giant wants to buy locally-owned Corvallis Clinic chain

It alarms me that United Health/ Optum may have control over The Corvallis Clinic but was glad to also read that there is an Oregon Healthcare Market Oversight Program.

I hope this program will consider the negative aspects of United/Optum having a huge influence in the Willamette Valley-Coastal Region Health Care.

I have many friends who have related their poor experiences using United Health.

I have heard heart wrenching stories reported on news channels about United Healthcare denying claims under serious circumstances.

I have opposition to a large insurance company infiltrating an area for supposed good to the community but more to increase their leverage in the marketplace.

The article mentions secret algorithms used and redacted terms of the possible sale.

I hope that Oregon will continue to be a leader of independence and originality by encouraging the Corvallis Clinic to find another way to survive besides selling out to a corporation not a 'HealthCARE' based model.

I am a septuagenarian and have used the Corvallis Clinic for myself and family so know the worth it has.

Thank you for your serious, in-depth investigation of this supremely frightening plan.

Nancy De Sautel

Corvallis OR

2/6/2024

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245. Subject: Optum

Received 1/18/24

HCMO:

Hello:

I am concerned about Optum's purchase of Corvallis Clinic. I don't know anything about Optum, but I think Corvallis Clinic is better off to be independent, or at least their patients most likely are. Corporate takeovers have generally been bad for the quality of products (in this case, care), & effects on employees, consumers, the community & environment, & leads to monopolies with reduced consumer choice along with increased prices. Far too little has been done to avert these takeovers & mergers, which have inevitably always led to ever increasing wealth & power to large corporations, disadvantages to small business, & increasing wealth & power disparity in our society, as ordinary citizens are increasingly unable to afford basic needs like housing & healthcare. I urge you to strongly consider preventing this takeover.

Thank-you!

-Jim Rankin

246. Subject: Optum

Received 1/18/24

To whom it may concern:

I am writing to request that OHA conduct a Comprehensive Community Review Board process regarding the proposed merger of Corvallis Clinic and Optum. Much more sunlight needs to fall on this issue, which is currently shrouded in masses of redactions.

Although Optum twice has poached in Oregon before this proposed acquisition, it's the first for them under Oregon's merger review process.

OHA's actions during the pandemic often made me proud to be an Oregonian. While seemingly less dramatic, this is another moment where OHA can show that government can make a difference for its people.

This mess IS connected to the pandemic. Optum is here precisely because the pandemic weakened Corvallis Clinic and other similar medical practices. It's Optum's goal to Hoover up all the surviving physician-owned practices.

My husband and I have been patients in the Corvallis Clinic since we arrived in 1991. We use Samaritan Health Services also. If Corvallis Clinic is suddenly in service of the wants of hungry shareholders, Samaritan will not be able to serve all the fleeing patients.

What we have in this area could be called a duopoly. While not the best theoretical situation for consumers, the outcomes with a clinic started and owned by local doctors and a large not-for-profit hospital are better than many places. We have some choice.

If OHA fails to defend our health care system from Optum's latest venture/vulture capitalism attempt, our health system will be immediately weakened and irreversibly so. We already know that costs go higher, faster when this kind of consolidation occurs.

2/6/2024

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One potentially unique factor is that Optum can use this foothold to retaliate against Samaritan Health Services, one of two hospital systems that shut out the parent UnitedHealth's insurance policies. Samaritan Health Services didn't take this action on a whim. UnitedHealth is a deadbeat that squeezes patients and providers by exploiting the system.

OHA should approach vertical integration of the kind proposed here with extreme caution. If Optum's tech is so magical, why don't they just sell these systems to medical practices as a third party service?

The Lund Report says that Optum is clocking 8.5 percent net profit, compared with 5.8 percent net profit for insurance services under UnitedHealth in the same period. This is the real driver of vertical integration. These people aren't here to be nice to us -- even if they are from Minnesota.

I'm pretty sure Optum is going to extract that net profit not through real efficiencies but by other means that are not salutary for the mid-Valley's health system. They claim they can do this in a year or two. That statement alone is a flashing yellow light.

Oregon is exceptional in another way that affects this proposal. In 2022, voters added this to the state constitution: Measure 111 amends the Oregon constitution by adding: "It is the obligation of the state to ensure that every resident of Oregon has access to cost-effective, clinically appropriate and affordable health care as a fundamental right."

We don't fully know the fiscal side of how Oregon can fulfill this new provision. But OHA can at least ensure that we don't take a giant step backward in the mid valley.

OHA may not receive many letters through today because of the compressed comment period, made worse by holidays and weather events. Please don't interpret this as apathy! I agree with the testimony in recent letters from local health care advocates Mike Huntington, Warren George, Karen Christianson and Bruce Thomson. They speak for thousands of mid-valley residents whose very lives are at stake.

Rebecca Landis

247. Subject: Optum

Received 1/18/24

I am a retired public health nutritionist and a 10-year resident of Corvallis. I'm writing to express strong opposition to Oregon Health Authority (OHA) approving the proposed takeover of The Corvallis Clinic by Optum, a subsidiary of UnitedHealth Group.

This is a step in the opposite direction from OHA's stated goals, which include improving the health of people living in our state, increasing the quality of healthcare in our state, and reducing the cost of that health care.

Overall, there is ample evidence that mergers increase health-care costs.

As one of the largest — perhaps the largest — employer of physicians in the U.S., UnitedHealth is focused on shareholders and profits, not on patients, providers, and quality of care. Optum Health CEO Amar Desai said as much at its 11/2023 conference for investors: "We are becoming the practice and partner of choice in the marketplace." At the same conference, UnitedHealth CFO John Rex was quoted as saying that Optum Health's revenues would be at least \$110 billion in 2024. Is this the kind of provider Oregon needs to achieve OHA's stated goals? I say not.

As further important evidence: Locally, as a partner in patient well being and payment coverage in the Corvallis area, UnitedHealth has a poor track record/reputation.

Three additional thoughts:

1. This proposed merger has not been well-publicized. One article appeared on January 8 in the Corvallis Gazette-Times. Most people do not have access to the paper, and even for those who do, 10 days is insufficient time for many to consider, compile, and submit a comment on such a critical issue. More time would also allow for additional options to be explored to help The Corvallis Clinic.
2. A Comprehensive Community Review Board process regarding the proposed merger would be helpful in many ways, including constructively addressing the issues noted in item #1 above.
3. I'm aware of this being the first case to undergo the review process established by the Health Care Marketplace Oversight Program and also of the importance of the precedent set by the decision in this case.

I respectfully urge you to reject the proposal. Thank you for your service on behalf of all Oregonians.

Suzy Pelican

Corvallis

248. Subject: Do not allow acquisition of Corvallis Clinic by Optum Health

Received 1/18/24

Dear Oregon Health Authority,

I am writing to express my strong opposition to the HCMO allowing the acquisition of The Corvallis Clinic by Optum Health, of the UnitedHealth Group.

Here's why:

I seriously doubt that Optum Health is seeking to acquire the Corvallis Clinic to improve healthcare services, and to reduce denials of insurance coverage for the services.

More likely, their motives are growth, and profit for themselves. Optum Health is likely to increase the revenue stream from what is now the resources of the Corvallis Clinic by increasing denials of insurance coverage, and increasing delays for service based on the type of insurance each patient has.

These policies are quite certain to entail a decrease in the availability of healthcare services, and in the costs that patients would be required to pay for the services. Because I expect that an acquisitions would result in such worsening of healthcare services, I ask the HCMO to deny the petition of The Corvallis Clinic and Optum Health.

I am very concerned that healthcare in our country is, on the whole, worsening. I implore you not to contribute and intensify that worsening. Mendacity in the various healthcare industries is worse than mendacity in other industries because it leads directly to people suffering, and to people dying.

Regards,

2/6/2024

134

Mary Elizabeth Braun

Corvallis, OR

249. Subject: Optum Oregon MSO & The Corvallis Clinic

Received 1/18/24

Please consider my full support for the Optum Oregon MSO, LLC acquisition of The Corvallis Clinic.

Optum is a fantastic company, very well managed and a tremendous advocate for the clients.

The Corvallis Clinic has historically been terrible managed with awful customer support

as a father of four I am responsible for the healthcare of six humans, I am excited for the changes and confident it will have a positive impact on my family as well as the entire community

250. Subject: Corvallis Clinic takeover

Received 1/18/24

I am against this

Susan Bentz

251. Subject: United Healthcare and Corvallis Clinic proposal

Received 1/18/24

Hello.

As a former client of United Healthcare, I strongly oppose their purchase of/merger with Corvallis Clinic. I do not believe that United Healthcare is at all transparent nor do their policies and procedures suggest that they are patient-oriented. They have NO local ties and a bad reputation.

For me, United Healthcare was a bad experience. Although they covered the big stuff, preventative health care like mammograms weren't fully covered and Rx copays went high and higher and higher — with no discernible pattern and no notifications. When a \$175 Rx goes to \$261, that's a FAIL!!

I truly hope that you will see this merger as a bad deal for Corvallis and Corvallis Clinic patients. Corvallis Clinic has had a good reputation for many years. I am quite certain that United Healthcare would change that. 😞

Thank you for considering my thoughts and opinions.

"PJ" Paula Jean Carter

Corvallis, OR

252. Subject: Optum

Received 1/18/24

To: Who may Concern

2/6/2024

135

I oppose the purchase of the Corvallis Clinic by Optum. Optum is a part of the UnitedHealth Group, a major corporation. I don't see how this would benefit the community in offering quality health care service at an affordable price. From reading about Optum they use algorithms that basically exclude equal health care to minority groups.

Please oppose this transaction and keep health care affordable for all.

Thank you,

Michele Ottmar

253. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/18/24

Please do not allow our physician-owned health care service to be taken over by Optum. Our experience with corporate health-care services has been terrible, and there is nothing reassuring about Optum's track record. The only ones motivated to prioritize quality care over profit are the ones who have dedicated their lives to it - the doctors who live here.

Thank you.

W. D. Smyth, Professor Emeritus

College of Earth, Ocean and Atmospheric Sciences

Oregon State University, Corvallis, Oregon, USA

254. Subject: Optum Corvallis Clinic Takeover

Received 1/18/24

I strongly oppose the potential takeover of the Corvallis Clinic by Optum/United Health Group. Time and time again, we have evidence that these profit-driven ownership models for health care, elder care, and rental properties are not serving the people of Oregon or the United States well. Our world ranking for health outcomes and cost is embarrassing, and beyond embarrassing, we pay for it with our lives. It is time to put a stop to these large corporations taking ownership of our most fundamental needs. Please, do not allow this to happen.

Sincerely,

Rita Brown

Corvallis, Oregon

255. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/18/24

Please deny Optum's application to take over the Corvallis Clinic. As we move towards implementing the constitutional mandate of insuring that health care is a right we cannot allow profit-driven corporations to assume more and more control over health care delivery. Optum is driven by profits and has a history of driving up health care costs. On the other hand, community-

based health care including the Corvallis Clinic has a long history of keeping costs affordable and of serving the community's needs.

Benjamin (Benjy) Ben-Baruch

Ashland OR

256. Subject: Community comment on purchase of Corvallis Clinic by Optum

Received 1/18/24

Hello. I'm Tristan, a member of the Corvallis community. I oppose the purchase of the Corvallis Clinic by Optum. It seems like it may lead to the Clinic being less accountable to the community and more focused on turning a profit.

257. Subject: Optum takeover opposition

Received 1/18/24

Dear Oregon Health Authority,

I sincerely hope you can do whatever is in your power to prevent our small doctor owned clinic which does a great job of serving our community in corvallis. from being taken over by Optum/United Health Care. Their history for prioritizing profit over care is the worst case example of when corporations take out smaller businesses in a community and suck out all the money at the expense of both employees and patients.

Thank you for helping to protect our community from corporate takeover.

Malcolm

--

Malcolm Anderson

Philomath, OR

258. Subject: Optum Corvallis Clinic

Received 1/18/24

I am submitting the attached as a comment related to the Optum/Corvallis Clinic proposed merger.

John Santa MD MPH

Attachment: [Letter] John Santa MD MPH Optum Corvallis Clinic Comment.docx

My name is John Santa MD MPH. I am a retired primary care physician and health administrator. I have practiced in multiple clinical settings and managed multiple physician practices. I oppose this merger and urge HCMO to do a comprehensive review, including the creation of a community board to review the merger, including public meetings with the communities affected by the merger.

A comprehensive review is needed in order for the Mid Valley community to better understand what is happening to a 75 year medical practice that many in the

community and state treasure. The information provided by the applicant suggests the Corvallis Clinic is struggling financially. Clinician compensation is reported to have decreased. The Clinic is reported to have challenges recruiting though the Clinic home page announces the recruitment of 4 providers. This is worrisome but usually can be solved in a variety of ways short of a merger that would fundamentally change the clinic's culture and threaten the community in a variety of ways.

United/Optum controls close to 100,000 clinicians across the United States. Adding the Corvallis Clinic will increase that number by 0.1% but it may forever change the relationships the Clinic has built with the community. The fact that Optum is part of a publicly traded company means significant decisions will be made quarterly if profit margins are not as high as expected. Almost all private physician practices are for profit but the culture of publicly traded for profits is especially risky and challenging.

In contrast Corvallis Clinic is key to the Mid Valley community. Quoting from a recent Community Impact statement published by the Clinic:

“The Corvallis Clinic contributes \$106 million to the economic well-being of the Mid-Willamette Valley, and is responsible for 1,456 jobs, locally. The Clinic employs more than 600 people, working in seven locations. It is the second-largest property tax paying employer in Corvallis (fifth-largest employer overall.) Being a for-profit business, The Clinic pays more than \$400 thousand in property taxes annually, helping to support the Benton County, City of Corvallis, and Corvallis School District services and facilities that enhance our quality of life. In direct spending – payroll and operations – The Corvallis Clinic injects more than \$41 million into the economy every year.”

Learn from history—don't repeat it. I was involved in a leadership role from 1997-1999 in a for profit effort to enable three large independent clinics (Corvallis Clinic, Medford Clinic and HealthFirst in Portland) to create a for profit parent company (Physician Partners Inc) that would either take the clinics public or sell them to a publicly traded physician “management” company called Phycor. It was a disaster leading to the bankruptcy of Medford Clinic, the dissolution of HealthFirst and the near bankruptcy of Corvallis Clinic. The clinics had long trusting relationships with the communities they served. That all changed when their intentions became clear. Trust disappeared. Hundreds of practices were destabilized creating incredible access problems. Corvallis Clinic was able to survive because of its relationship with the community.

The first priority for a clinical practice should be its patients. The second should be its community. When a successful practice struggles financially it is almost always the fault of the dysfunctional market it happens to be in. Don't punish the clinicians by allowing an even more dysfunctional approach. There are multiple options to consider.

If this merger proceeds, costs will rise in the Mid Valley. Multiple research studies support this. The publicly traded, for profit organization, adds a need for significant predictable profit margin and substantial marketing and technology to identify and attract a healthy population. It relies on a variety of accounting and other financial

strategies to impress investors. Patients are a revenue source. It accomplishes this by selecting healthy patients via targeted advertising, leveraging other health providers in the community to discount prices and outsourcing a variety of services to cheaper labor markets. New technologies are emphasized but often they are mostly used to maximize reimbursement through a variety of clever billing and selection schemes. United Health is currently being scrutinized by the Federal government for these strategies in its Medicare Advantage plans.

A January 23, 2024 piece in Barron's (<https://www.barrons.com/articles/unitedhealth-group-earnings-stock-price-a04330da>) perfectly frames the challenge. United's 2023 fourth quarter profits have decreased, they claim due to utilization increases. United believes a major factor is seniors getting RSV vaccinations from primary care doctors who are then ordering other services due to health care gaps. That's appropriate care that should be applauded not discouraged. All the focus is on patient utilization and reducing it when multiple other strategies, like reducing administrative costs, are available.

Of most concern in Oregon is the impact on health equity this strategy would have. Sadly, the key to health care success remains selection---selection of healthy patients and healthy communities. Rewarding health systems who use selection as a major tool for profit discourages and delays health equity efforts.

Give the Mid Valley community a chance to understand and process what is going on and the options. Prioritize the third goal in HCMO rules: "A process that is transparent, robust and informed by the public, including the local community, through meaningful engagement."

259. Subject: Corvallis Clinic status

Received 1/18/24

Gentlepeople:

Like many others in the Corvallis area, I feel concerned about what apparently is happening in our medical community. As a Medicare recipient myself and as a trained SHIBA counselor aware of the advantages and pitfalls of choosing a Medicare Advantage plan over traditional Medicare, I would like to voice my opposition to the proposed sale of the Corvallis Clinic to Optum Health. Continuing to privatize Medicare and to centralize the ownership of medical services by larger, for-profit entities is counter to what I want for my community and for the seniors and folks with disabilities who rely on Medicare.

Please examine very carefully the motives of United Health Care in its approach to the Corvallis Clinic with its many fine physicians and other health professionals. Our community deserves a fully independent clinic offering the widest possible choices and coverage. This proposed acquisition is in completely the wrong direction if we value personal choice, professional support, and a vibrant care community.

Thank you,

Laurie Labbitt Perry

Corvallis, Oregon

260. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/18/24

I am opposed to the takeover of the Corvallis Clinic by Optum/United Health. I have read about other physician-owned practices that have been taken over by large corporate interests. The emphasis turns to shareholder profits, and patients' needs take a back seat.

I am one of many community members who depend on the Corvallis Clinic. Please stand up for local health care and deny this takeover attempt. Thank you.

Maia Fischler

261. Subject: Optum purchase of The Corvallis Clinic

Received 1/18/24

Attn: Healthcare Market Oversight Committee

I am writing to express my strong opposition to the proposed acquisition of The Corvallis Clinic by United Healthcare subsidiary Optum. This merger raises significant concerns that could adversely impact our community's healthcare landscape.

To be upfront, I am biased as I am one of the few private practice clinics in the community. This merger already has increased competitive hostility within the community and will make it more difficult for independent entities to survive and maintain competitive forces needed to keep healthcare costs down. One can make the argument that the large influx of money from Optum will enhance care options, but as communities all around the country have seen it comes with a price tag. Ultimately this will put more pressure on my clinic as it will likely lead to a turf war between Samaritan and Optum which has already started and make finding local referrals for an independent primary care clinic such as mine more difficult. If patient's can't get what they need from me, they will be forced into one or the other system limiting patient choice.

Next, there's a real worry that this acquisition could lead to increased healthcare costs. It's no secret that massive corporations and private equity are purchasing healthcare groups all across the country. At one time I was under the impression we had laws protecting against the corporate practice of healthcare, but I see the exact opposite occurring in our country and now knocking on the door of our community. Let's not kid ourselves, this move is not about providing good care, it's about controlling both the inflow and outflow of healthcare dollars to increase margins and profits. There are laws in place limiting the profit margin of health insurers. UHC has managed to dramatically increase its profit margins over the last 7 years or so through its expansion into medical clinics which have no such restriction. Consolidation in the healthcare industry results in reduced competition, giving the merged entity more leverage to set higher prices for medical services. This could place an additional financial burden on patients and limit access to affordable healthcare.

Furthermore, the potential consequences of decreased patient choice and limited access to healthcare services are deeply troubling. The Corvallis Clinic (TCC) is an integral part of our local healthcare ecosystem along with Good Samaritan Hospital System (GSH) which are the 2 big players in the area. TCCs sale to Optum will lead to a reduction in the variety of medical services available to our community. This is already playing out in the community. GSH has dropped UHC insurance as a preliminary protective measure and begun to put restrictions on new patients who

aren't a part of GSH, similar to current operations at TCC. This will make it more difficult than it already is for new or independent providers to survive in the community and create the options and competition that helps create choice and keep costs reasonable. It is also stunningly predictable that you will see a mass exodus of providers unwilling to work for UHC within 1-2 years after their mandatory lock in as part of a sale contract run out and they can choose to go elsewhere as Optum is well known for its provider burn out.

As much as I am not a huge fan of Samaritan, it is at least a community focused organization and locally invested. A weakened hospital system could face further challenges, potentially leading to a forced sale in the future. Financial survival is a struggle for the state's hospital systems and I am quite concerned that the financial pressure from a corporate behemoth will further weaken Samaritan's ability to remain local and force a sale to an equally large hospital or private equity behemoth. This instability in our healthcare infrastructure poses risks to the overall well-being of our community.

In your arguments, you will hear about the financial struggles of TCC related to the pandemic. Yes I understand they were hurt by the shutdown as were most businesses. When factoring this in though you should also consider that during that time they received around \$1.7 million in state grants and another \$8.798 million in PPP money. Somehow in the midst of \$10 million dollars of free money they manage to still struggle and yet... in that same time built a brand new very nice building in North Albany and are currently renovating a new larger building in Philomath. I don't buy the argument that they can't make it financially. Poorly run and unwilling to make choices they need to make perhaps, but they are capable of survival or negotiating their way into stability.

If the OHA were to take a position to nix this merger it would be in both GSH and TCC best interest to renegotiate their obnoxious lease arrangement which strongly favors GSH and does strain TCC financially. One suggestion is for GSH to reduce TCC monthly rent by \$100k/mo in exchange for contractual restrictions on TCC's ability to sell to certain entities. While it would cost GSH money, it would cost far less than what it is going to cost GSH to compete directly with UHC/Optum.

In light of these concerns, I urge you to carefully consider the implications of Optum's planned purchase of The Corvallis Clinic. It is crucial to prioritize the interests of patients and the community's long-term healthcare needs over corporate consolidation.

Sincerely,

Sean Greene, CEO, PA-C

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Sean Greene

www.valleyclinics.com

262. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/19/24

The Corvallis Clinic is one of the aspects that makes Corvallis a desirable and special place to live. My senior citizen parents have lived in Corvallis for several decades, and as their occasional caregiver and health care representative I have witnessed the quality of health care they have received from multiple doctors and facilities of The Corvallis Clinic. The citizens of Corvallis are

rightfully proud and protective of their town's community-centered character, and The Corvallis Clinic is a core part of that character. It is important that people, as patients, feel trust and confidence in their health care providers. PLEASE REJECT Optum/United Health's bid to acquire The Corvallis Clinic, and let Corvallis be a model for locally managed, patient-centered, and ethical health care.

Sincerely,

Grace Y. Richter

Eugene, Oregon

263. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/19/24

Please keep UHC out of Oregon. They only care about profit and patient health is not their concern. They drive prices up and quality goes down all in the name of profit. Oregon is better than this. They will takeover healthcare if given a chance and a presence in Oregon. We need universal healthcare not more corporate greed in Oregon.

264. Subject: Optum Corvallis Clinic: Please Reject this merger

Received 1/18/24

To Whom it May Concern:

I am writing to express my significant concerns, which align with the overwhelming concerns of my constituents, about the proposed merger/acquisition proposed between the Corvallis Clinic and Optum Healthcare.

Execution of this rushed merger will lead to poorer health care for people in my district by bringing in a large, multinational public equity backed corporation with a well-known reputation for cutting corners on patient care to maximize profit. Just this past year, United Healthcare's poor practices in reimbursement, delay in pre-authorizations and funneling unsuspecting patients into inadequate long term care facilities that would drain their life savings has wreaked havoc in my legislative district. Our only local hospital system, due to these practices, was forced to cancel its contracts with United. Even after this occurred, I had to help predominantly elderly constituents who received misleading information from United. This information could have caused them to lose access to medical care or at least face substantial unexpected out of pocket costs.

Unlike the current Corvallis Clinic which is owned and operated by people familiar to the community, United Health can hide behind a screen of LLCs, management firms and private equity to evade responsibility for choices that maximize profit and minimize the well-being of their patients. One example of this is a current lawsuit against the organization related to its use of an algorithm that results in discriminatory denial of care to elderly and disabled people. This is a life-threatening issue and one that violates hard won statutes in Oregon that require all decisions about access to care cannot be based on assumptions about a patient based on their protected class. Instead, decisions must be made on an individualized bases in consultation with the patient according to the best objective medical evidence. Forcing physicians to practice medicine by algorithm is inconsistent with this mandate.

In another example, just last year, United Health was ordered to pay \$91 million in damages after a court found that the company unilaterally decreased physician reimbursement rates in violation of its contract with a physician management company known as Envision. Similar rulings were made in courts in other parts of the country, including Florida and Nevada.

Although these are examples of the insurance arm of United, it is important to note the significant conflict of interest that this represents. If United Health owns the Corvallis Clinic it will choose which insurance plans it accepts creating a risk that their combined control of physician salaries, panel selections and accepted insurance plans could create a monopoly which could effectively deny care to the most vulnerable individuals in our community. Access to an alternative provider network is a significant challenge in this community as only those with the provider coverage and transportation to travel to Eugene or Salem would be able to seek alternative care. Given the size of the community, the ability for large numbers of patients to switch their care to Samaritan is not realistic.

United Health is aggressively advertising to physician's groups to bring them into arrangements like the one that is proposed here. At the same time, they are consolidating their power as an insurer, and looking to gain a monopoly in health care data management and homecare services.

United Health Group is also the owner of UHS, a company that is well known for its abusive practices in mental health and treatment facilities across the country. At UHS operated Provo Canyon School in Utah an Oregon child with a developmental disability was placed in isolation, chemically restrained and beaten so badly that she was left unable to eat in 2019. In 2020, UHS was ordered by federal authorities to pay \$122 million to settle claims related to the False Claims Act due to the provision of inappropriate billing and illegal kickbacks. A Mother Jones investigation last fall highlighted the abhorrent practices of UHS that exploit foster children for profit (<https://www.motherjones.com/criminal-justice/2023/10/universal-health-services-foster-kids-uhs-investigation-takeaways/>).

I appreciate that many companies have skeletons in their closet, a settled lawsuit or a new business strategy gone bad. However, United Group is different. They are a massive organization that is not shy about repeatedly cutting corners, skirting the law and putting the well-being of patients at risk. My constituents deserve better than to be subject to a company with such a poor track record for quality, safety and ethical practices.

Finally, this profound change was proposed with little transparency. The notice was filed during a time many people are traveling or otherwise disengaged from politics and community events. As a result, the already brief period to learn about the issue and raise concerns was further curtailed. The time allowed for those who rely on the Corvallis Clinic to wrap their head around this complex proposal and offer comment is insufficient given the severe consequences this merger may have on their health and wellbeing.

I urge you in the strongest possible terms to reject this proposal.

Thank you for your consideration.

Sincerely,

Sara Gelser Blouin

Senator Sara Gelser Blouin

Pronouns: She/Her/Hers

Senate Majority Whip

Chair, Senate Human Services Committee

Sen.SaraGelser@oregonlegislature.gov

(503) 986-1708* 900 Court Street NE, Salem, OR 97301

Please note this is not a private email account. Legislative staff have access to this account and all email to and from this account may be considered a public record.

265. Subject: Letter from Speaker Dan Rayfield - The Corvallis Clinic acquisition proposal

Received 1/17/24

Hello,

I am submitting the attached letter on behalf of House Speaker Dan Rayfield, regarding the proposed acquisition of The Corvallis Clinic by Optum Oregon MSO. Please let us know if there are any questions or clarifications needed. We would be happy to schedule a meeting to further discuss the proposed deal and OHA preliminary review.

Sincerely,

Taylor Smith-Bedsworth

Legislative Assistant

Oregon House Speaker's Office

Taylor.SmithBedsworth@oregonlegislature.gov

He/Him/His

Attachment: [Letter] Letter to OHA - The Corvallis Clinic proposed acquisition by Optum Oregon MSO.pdf

Dan Rayfield
STATE REPRESENTATIVE
House District 16



HOUSE OF REPRESENTATIVES

January 17, 2024

Oregon Health Authority
800 NE Oregon Street
Portland, OR 97232

RE: OHA seeking public input related to Optum Oregon MSO's proposal to acquire The Corvallis Clinic

As State Representative for House District 16, a number of community members have expressed significant concerns regarding the proposed acquisition of The Corvallis Clinic by Optum Oregon MSO, owned by UnitedHealth Group Inc., as well as the accessibility of the public comment period. It is my intent to ensure a robust and transparent public comment period followed by comprehensive review of submitted materials by the Health Care Market Oversight program at Oregon Health Authority.

Certain aspects of this proposed acquisition and review process have raised concerns among the community. I've heard a great deal of apprehension regarding the potential impact of this acquisition on the quality and accessibility of health care services. Evidence suggests that investor-owned health care services, such as those owned by UnitedHealth Group, can lead to reduced care quality and access. UnitedHealth Group's recent expansion in other parts of Oregon has added additional cause for concern about health care market competitiveness in the state.

Given the seriousness of this proposed transition and the potential impact on the community of Corvallis, I strongly urge you to extend the opportunity for public comment to take advantage of the full 30 days. A longer public comment period better aligns with our shared intent of a robust and transparent process. For a transaction of this nature, it is essential to take the time needed to allow for full public engagement and a meaningful review of comments and feedback.

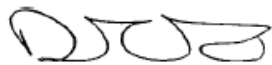
In light of these concerns, I respectfully request that the Oregon Health Authority consider the following:

1. Extend the period for public comment until at least the maximum allowable 30 day window outlined in OAR 409-070-0055. This would allow for a more thorough understanding of the deal's implications and alternative courses of action.
2. Under OAR 409-070-0062, the HCMO program has provisions that allow OHA to convene a Community Review Board. As the acquisition of The Corvallis Clinic would affect patients in three counties, I feel the transaction requires this level of review.
3. Ensure that any decision aligns with the goals detailed in OAR 409-070-0000, particularly those related to improving health equity, access to care, and ensuring a transparent and public-informed process.

It is imperative that any significant change in our health care landscape not only complies with legal and regulatory standards but also genuinely serves the best interests of Oregonians, particularly in terms of health care access, equity, and cost.

I look forward to your response and am eager to collaborate in ensuring that the review process and any resulting decision truly reflect the needs and expectations of our community. Thank you for your attention to this matter.

Sincerely,



House Speaker Dan Rayfield

266. Subject: Please deny Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/19/24

Corvallis Clinic is a fine, physician owned and operated provider in my town, Corvallis, and in many other Oregon towns. History shows that the takeover of the Corvallis Clinic by a mega-corporation is likely to lead to higher costs for patients and poorer service and health outcomes. Please don't allow this purely profit-driven acquisition. Health care serves a higher purpose.

Sincerely,

Kathleen Rochester and Mark C. Rochester

Corvallis, OR

267. Subject: Corvallis Clinic

Received 1/19/24

Greetings,

I'd like to share my opinion that the sale of The Corvallis Clinic to the United Health group would not be a positive move for the Benton County community or Oregon. It is my understanding that the parent organization seeks to reduce competition which ultimately contributes to higher costs. I plead with you to consider carefully the risks of these practices to our already failing "healthcare system" and turn down this deal.

Respectfully,

Carol Walsh

Corvallis, OR

268. Subject: Re: Optum purchase of Corvallis Clinic

Received 1/19/24

Dear OHA,

I intended to mention in me email below, that it was Representative Dan Rayfield who provided the link to OHA's notice about the public comment period in his reply to a concerned Corvallis resident who then shared this in his post on Nextdoor this evening. No one in the community seemed to know of this.

Thank you again for considering my request for an extension of OHA's public comment period.

Sincerely,

Arlene Merems

cc:

Representative Dan Rayfield,

SEIU Public Services Team

Hello,

I only recently learned through a discussion on the social platform, Nextdoor, that Optum is proposing to purchase the Corvallis Clinic. Corvallis Clinic is my 'medical home' through Providence Choice Health Plan (PEBB policy) . To my knowledge, there has been no public notice/outreach on this matter from Corvallis Clinic, Optum or OHA. I only learned tonight through a neighbor posting on Nextdoor regarding Representative Dan Rayfield's concern, that OHA is/was taking public comment and that the comment period closed yesterday, January, 18, 2023.

Based on the opinions and discussion of numerous local residents on Nextdoor who depend on Corvallis Clinic for their medical services, there is nearly unanimous concern and negative reaction about Optum taking over Corvallis Clinic. Largely because they are owned by United which has a terrible track record for underpaying or denying claims and underpaying physicians and medical facilities. There is no way to know what this means for those of us who's insurance is currently accepted at Corvallis Clinic, and there are very limited options here in Corvallis. If Optum does not accept my policy, or if my policy does not cover Optum, where does this leave me and countless others? The corporate take over of a doctor-owned clinic is a travesty in this country generally, and should not be allowed.

OHA has done a disservice to those of us dependent on Corvallis Clinic by not providing sufficient public notice about this review.

I strongly urge OHA to extend the comment deadline for an additional 30 days and OHA should expend great effort to inform the public about the opportunity to comment, particularly for the patients of Corvallis Clinic who would be directly affected by this transaction.

Thank you for your consideration,

Arlene Merems

Corvallis, OR

269. Subject: Optum

Received 1/20/24

Since many in Corvallis drive to Kaiser in Salem, it would be a great service to Corvallis if Kaiser would buy Corvallis Clinic. Another option would be if Nurse Practitioners would form a co-op and purchase the clinic. They have a high level of community satisfaction scores, often better than MD's, provide excellent equal care, and are cost efficient. NP's can contract and/or refer to MD's as needed. Most of the community of Corvallis is already served by Nurse Practitioners.

270. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/20/24

I believe this potential acquisition meets the criteria for conducting a comprehensive review under ORS 415.501, since there is certainly potential to have a negative impact on access to affordable care in Oregon, and it also meets the criteria for convening a Community Review Board.

Please do a deeper dive to make sure promises are built on a proven track record and not just lip service. Oregonian's health and well being are on the line. Affordable Healthcare is already difficult to achieve.

Thank you for your consideration.

Hilary Boyce

271. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/20/24

Dear OHA

I am against the purchase of the corvallis clinic by optum health care. I am worried about how small this clinic is relative to the size of optum health care. Optum will put profits ahead of health care. Please do not approve this.

Sincerely

Martha Truninger

Corvallis OR

272. Subject: United Healthcare Purchase of Corvallis Clini

Received 1/20/24

I haven't read all of the comments submitted to date. However, most of the comments I did read were of a negative nature.

I understand everyone's concerns that this purchase will put United Healthcare in control of a sizable portion of the health care services in Corvallis. I am also aware of the many shortcomings of United Healthcare including their denials of services, Medicare payment issues, UHC profits, etc.

However, I am also concerned with the future financial health and viability of the Corvallis Clinic. My fear is that without this transaction being approved and consummated the Corvallis Clinic will fail, leaving a sizable portion of the Corvallis population without medical care or creating an overwhelmed Samaritan Health organization as additional patients seek the available limited medical services. I dread thinking how long it may take to see a physician with the influx of Corvallis Clinic patients clamoring for appointments.

I know this may seem a choice between two evils, but it is a choice you must make. Let the market (patients) decide. If they don't like UHC, for whatever reason, they can vote with their pocketbook - whether they are on a private medical plan or Medicare and leave the Corvallis Clinic and seek medical services from Samaritan or other providers.

For me, as a patient of Corvallis Clinic and a United Healthcare Medicare Advantage member, the choice is clear - for the greater good the transaction must be approved.

Thank you for considering my concerns.

David Bergevin

Corvallis, Oregon Citizen

Corvallis Clinic Patient

273. Subject: OPTUM

Received 1/20/24

Please do not let United Health take over the Corvallis Clinic. Good Samaritan and other groups have had too many problems getting them to honor their payment obligations.

- Optum Oregon MOS is owned by UnitedHealth Group Inc, the largest health care corporation in the US. UnitedHealth has a long history of driving up costs in the name of profit and has been the subject of a lot of controversy, nationwide, over the last decade.

We ALL need honest health care providers to manage our health care systems. Optum has a terrible track record, and leaves patients and clinics stranded too often.

Thank you,

Leslie Redpath

Fred Heil

Corvallis. OR

274. Subject: Optum

Received 1/20/24

To the Oregon Health Authority,

As a resident of Corvallis and an RN of nearly 34 years who also has some understanding of the insurance industry I strongly object to Optum/United Health Care purchasing The Corvallis Clinic.

United Health care as an insurance company is terrible to work with; many nursing facilities and Home Health agencies refuse to accept their insurance. They deny skilled nursing facility stays for patients that would have been covered by Medicare or other Advantage plans. Samaritan recently did not renew their contract with United Health Care due to them slowly or not properly paying for care that their members should be covered for. There are multiple lawsuits nationwide involving United Health Care's failure to provide appropriate coverage. With that kind of track record I cannot imagine this company providing quality patient care and easy access. Health care institutions are financially stressed and clearly Corvallis Clinic is no exception. It would be better for the community if the purchase was made by an organization with a track record of good health care in Oregon Like Providence Health systems, OHSU, Salem Health, or Peace Health.

Whatever happens, do not allow The Corvallis Clinic to be sold to United Health Care/Optum.

Thank you,

Amy Ayers, RN BSN

275. Subject: Optum take over of Corvallis Clinic

Received 1/21/24

I am opposed to Optum Oregon MSO's attempt to purchase the Corvallis Clinic. I am a patient there and am very concerned about what would transpire with this take over.

With these kind of consolidations to a larger organization, decisions to address problems are not decided locally at the clinic. But rather, the decision is made "up the chain" at some remote office. That is an inefficient, model, and makes for a slow and inappropriate response. The patient suffers.

Please disallow this take over!

Mark Keller

Linn County, Oregon

276. Subject: Corvallis Clinic merger

Received 1/21/24

Public comment: I am a resident of Albany Oregon and a patient at Corvallis Clinic.

I am concerned that this proposed merger with United Health Care will result in less accessibility, higher costs and poorer patient care.

Also, I am a Samaritan Health Plan member and I am concerned they will not cover costs of care under this proposed plan,

Sincerely,

Karla Knieps

Albany, Or

277. Subject: Public Comment Corvallis Clinic Merger

Received 1/21/24

I am a patient at Corvallis Clinic and I am quite concerned about the proposed merger. Ownership of health care in the United States by insurance companies and hedge funds has been the primary cause of the degradation of our health care. I am against this merger. It will raise patient costs and lessen the quality of care. This merger will only benefit greedy insurance companies and hedge funds. I read that this merger will also give non-profit status to this merger--which is ludicrous. These companies are for-profit companies, not non-profits!

Karlene K. Bergold

278. Subject: Optum

Received 1/21/24

I am writing in opposition to the acquisition of a portion of the equity of The Corvallis Clinic by Optum Oregon MSO. An element of this transaction includes a management agreement whereby

Optum will be in charge of all operations of The Corvallis Clinic including standards of care, staffing levels, and contracts for ancillary services.

As a subsidiary of the United Health Group (UHG), Optum has proven in prior transactions to be a bad actor by making promises to providers and employees of acquired clinics, then reneging on those promises. Physicians are required to meet daily patient visit quotas which significantly decreases the amount of time they are able to meet with each patient. Ancillary staff are told their jobs are secure, yet within the first year many are laid-off in a "cost cutting" measure. Both of these actions have a negative impact on patient care quality.

Andrew Witty is the CEO of UHG. As the CEO of any publicly traded company, Mr. Witty's primary legal responsibility is to maximize shareholder value by cutting costs and optimizing revenue streams. If he does not, any shareholder can hold him responsible via legal means. Given this, Mr. Witty and all the executive staff in UHG, including all its subsidiaries, do not focus on what is best for patients. We are simply relegated to the status of a commodity.

UHG has a littered history of legal trouble. As a subsidiary, Optum has shown that it falls in lock step with UHG and has been the target of numerous legal actions as well. The links below are only a small sample of the trouble both UHG and Optum have previously and are currently involved in. This is not an organization we want managing a significant amount of healthcare services in the Mid-Willamette Valley. Yes, most large companies have their share of legal issues but in the case of UHG and Optum they seem to have an inordinate amount compared to their peers.

Access to cost-effective, clinically appropriate, and affordable health care is enshrined in our state constitution as a fundamental right to all the residents of The State of Oregon. UHG and Optum have continually demonstrated they are not willing to meet this standard. Don't allow this bad actor to acquire any more healthcare operations in The State of Oregon. I urge the Health Care Market Oversight Board to not approve this transaction.

Thank You,

Fritz Stephens-Tiley, CHFP

Mid Valley Health Care Advocates

Board Member and Co-Chair Communications/Outreach Committee

[UnitedHealth violated labor laws during layoffs, former employees allege in lawsuit \(beckerspayer.com\)](#)

[Whistleblowers say United Healthcare hid complaints about Medicare Advantage plans | Fierce Healthcare](#)

[Optum | Complaints | Better Business Bureau® Profile \(bbb.org\)](#)

[OptumHealth accused of fraud in three lawsuits | Local News | santafenewmexican.com](#)

[Aetna, Optum must face 'dummy code' lawsuit, Supreme Court rules \(beckerspayer.com\)](#)

[UnitedHealth to Pay \\$15.7M to Settle Mental Health Benefits Parity Case | ThinkAdvisor](#)

[4th Circ. revives dummy-code lawsuit against Aetna, Optum | Reuters](#)

[UnitedHealth's Optum accused of antitrust violations in California \(statnews.com\)](#)

279. Subject: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/21/24

Having a major portion of Corvallis as Lila health care providers run by the largest health insurance provider in the USA is akin to the Fox guarding the henhouse

Let's keep our healthcare local, accessible, and patient-centered. Please deny the takeover of The Corvallis Clinic by Optum/UnitedHealth, or conduct a comprehensive review with a Community Review Board if more evidence is needed.

Sincerely,

Eric Rehm

Corvallis, OR

280. Subject: Optum

Received 1/21/24

Testimony against the merger of Optum with the Corvallis Clinic.

I am Michael Huntington, MD, a retired radiation oncologist from Corvallis. I strongly oppose the proposed merger of the Corvallis Clinic with Optum Oregon Management Services Organization (MSO). I fear the likely result of the merger would be increased costs and poorer healthcare outcomes for our communities.

I took care of and learned of many patients who had delayed care for months or would refuse care because they feared the cost of care. They would wait until a crisis of pain, bleeding, or breathing forced them to agree to be seen, often in the emergency room. The ER doctor would inform them that they had advanced cancers.

On November 6, 2023, Katherine Gudiksen of the University of California at San Francisco College of Law testified before the Oregon Senate Committee on Health Care. She asserted that medical mergers and acquisitions are the leading cause of escalating healthcare costs in the U.S.

<https://olis.oregonlegislature.gov/liz/202311/Downloads/CommitteeMeetingDocument/277682>.

David Baden, Acting Director of the Oregon Health Authority (OHA), affirmed Ms. Gudiksen's comments in his presentation to the Committee

<https://olis.oregonlegislature.gov/liz/202311/Downloads/CommitteeMeetingDocument/277646>

There are other reasons to oppose this merger. Optum Oregon MSO is owned by Optum, Inc., which in turn is owned by UnitedHealth Group Inc. (UHG). UHG has a decades-long history of fraud and abuse. For details, read the October 8, 2022, New York Times article, "The Cash Monster Was Insatiable. How Insurers Exploited Medicare for Billions." UHG was at the top of the list for being accused of fraud. UHG controls over one-fourth of the health insurance market. Other insurances, including Humana, CVS Health, Kaiser Permanente, and CIGNA, also behaved poorly.

In the past six months, two large hospital systems in Oregon have notified UHG that they are no longer accepting patients who have Medicare Advantage insurance through UGH. UHG had imposed intolerable and unjustified delays and denials of preauthorizations and payment of claims.

The OHA and the state of Oregon must honor the recently amended Oregon Constitution assuring equitable access of all Oregonians to affordable health care. To do so, Oregon needs a permanent moratorium on mergers of medical groups with out-of-state corporations. Without such a moratorium Oregon cannot control medical costs, maintain local control of health in our communities, nor comply with its Constitution.

Michael Huntington, MD

Corvallis, OR

December 30, 2023

281. Subject: Stop Optum and UnitedHealth takeover

Received 1/22/24

I am writing in reference to the takeover of Corvallis Clinic by United Health.

For several years I have read about problems for people using United Health for their insurance, their questionable and harmful business practices, their promises made but not kept.

I am asking for a Comprehensive Community Review Board process to convene to give serious consideration about this transfer, and I ask that the transfer not be allowed.

I am worried about saving my eyesight if this goes through, and I'm worried for thousands of others who will receive worsened care. I'm worried about Oregon's ability to move forward to a truly just, high quality and low cost method of delivering health care.

MY STORY:

My own personal situation involves about twenty years of struggle with eye surgeries and ongoing tracking after several vitrectomies, with the problem caused by an unknown source. The surgeries resulted in some lost visual acuity, but I was able to continue life almost normally.

When I moved to Corvallis in 2010 the skilled ophthalmologists at Corvallis Clinic recognized and knew how to handle my vulnerability and increasing eye pressure with skill, medications and carefully timed eye checks throughout the year.

Even with such competence, unfortunately one eye medication after another would begin to cause side effects, requiring a change in medication and more careful tracking.

We went through all possible eye meds and on the last choice when my eyes were still responding with worrisome side effects, I finally had to reduce the risks of Glaucoma by having a surgery called Trabeculectomy in one eye to force the pressure to stay low in that eye so we could use the problem med in the other eye only, thus lowering the body burden of that medication by 50%.

THAT has been successful.

If United Health were to take over, they would "standardize" the patient process, then everyone in a particular category could be assigned to receive the same medication and treatment. My highly individualized but successful plan for treatment would disappear in a crude and inappropriate plan that would put me at high risk of blindness.

This standardized approach allows more money to flow to top executives and shareholders, and that profiteering is at the expense of the needed and appropriate treatment for patients.

That is the difference between life and death, or eyesight and blindness.

I request please that you say No to the purchase by United Health. They provide a disaster of a health care model placing financial gain over patient health. They have been shown to be dishonest and untrustworthy.

Oregonians do not want this mega-corporate health care in Oregon and would line up to fight it by the thousands if they only knew about it, if only they were a newspaper-reading public, but that's another sad story across the nation.

Sincerely,

Karen Josephson

Corvallis

282. Subject: Optum

Received 1/22/24

Please deny the takeover of The Corvallis Clinic by Optum/UnitedHealth, or conduct a comprehensive review with a Community Review Board if more evidence is needed.

283. Subject: Optum

Received 1/22/24

Dear HCMO,

I am writing to ask (beg) you to please not approve the purchase of Corvallis Clinic by Optum. I have been a patient at the Corvallis Clinic for many, many years and the idea that some outside-the-area company would own and operate my local clinic is scary to the extreme. I had to choose another Medicare advantage plan just this last enrollment period but the Samaritan Group (our only hospital in the area) was no longer going to accept UHC because of the difficulties of dealing with UHC. This is the same UHC that owns Optum! How can this be good for patients? So please consider patients over a profit-driven model for our local clinic.

Thank you.

Best,

Mark

284. Subject: Optum...a bad idea

Received 1/22/24

The Corvallis Clinic injects more than \$41 million into the economy every year. Local residents deserve to have a say in the future of their health care in their community.

I believe that patients are the most important element of a health care clinic or facility. Patients should have a voice in what happens in their community on issues that affect their health.

History tells us that costs will rise in the Mid Valley if this proposal is approved. Multiple research studies have proven this. The publicly traded for profit model adds a minimum of 8-10% profit margin and a 10-20% marketing budget. It relies on a variety of accounting and other financial strategies to impress investors.

--

Dorrie Board

Dental Floss Enthusiast

285. Subject: Optum's Purchase of Corvallis Clinic

Received 1/22/24

To Whom It May Concern:

All of my family members go to the Corvallis Clinic in North Albany. We are opposed to the purchase of Corvallis Clinic by OPTUM.

Feel free to contact us with any questions.

Thank you,

Theresa and Doug Johnson

286. Subject: Optum

Received 1/22/24

Hi,

I have a comment I would like posted on the Optum-Corvallis clinic merger

I am a 60 year old resident of Corvallis and a life-long democrat. I do not work in healthcare, nor do I work for the clinic or Optum, but I do care about the clinic and I do care about keeping physicians in our community. I am troubled by the factual errors in the Lund report documents and I am troubled that this merger is being politicized with the involvement of a state representative. The state representative has his own goals and perhaps sees this as an opportunity to collect voters. The Lund Report has it's own agenda although it's unclear what that is. What is clear is that the reporting is biased.

Let's talk facts:

1. The Corvallis clinic is a private for-profit company of 600+ employees with over 100 providers (including physicians, nurse practitioners, physician assistants, mental health providers, and physical therapists) that has been in the community for 75+ years. It is NOT a non-profit organization.
2. The Corvallis clinic does NOT own it's buildings (this has been reported incorrectly and is easily verified online). This is important because the clinic's only assets are the physicians, employees, and the equipment they require.
3. From the documents submitted to the OHA, it is clear that the clinic has been struggling for a while and that the doctors have taken pay cuts just to stay afloat.

4. This large healthcare company did not swoop in to take control of the clinic. It is the clinic that sought out a financial partner. Similar to most healthcare establishments, The Corvallis Clinic is struggling financially. Health care systems have had to navigate many financial stressors- inflation, staffing shortages resulting in the need to increase staff wages, the aging of the population with rising medicare participants and decreasing reimbursement to name a few.

OHA's oversight of such mergers is relatively new and I am sure that it is mostly well-intentioned. Oregon law makers have done a decent job of keeping healthcare a priority for the state. However, using this particular merger as a target for political gain is problematic at best and libelous at worst. I read "evidence suggests" in the state representatives' letter without any evidence or support provided. There is no evidence that suggests an Optum-owned Corvallis clinic would be any different than it is today except that evidence does suggest that the clinic would become financially stable. My question is that should this particular merger be dragged out, what will happen to The Corvallis Clinic? This is the real elephant in the room. Bankruptcy means closing the doors perhaps for months, resulting in a mass exodus of clinic providers and hundreds of people out of work. Alternatively, they may be forced to make financial decisions that DO impact the ability of community members to seek care at the clinic, causing potentially thousands of patients to be without adequate access to doctors. If the OHA oversight is strictly to assure that mergers do not limit access to care, there should be no impediment to allowing this merger to move forward.

287. Subject: Optum

Received 1/22/24

Health Care Market Oversight,

I am emailing in opposition to the proposed purchase of the Corvallis Clinic by Optum/United Healthcare. Based on the following arguments and the abundance of public testimony already in your record, you should reject this acquisition.

1. Lack of Transparency. The posted documents in the record are highly redacted. There is an assumption being presented that the financial distress of the Corvallis Clinic is so severe that the acquisition is necessary to keep health care access afloat in the region, but we are unable to review the full breadth of the facts. United Health Care is a publicly traded company and by such should be used to the type of public disclosure required of them by the SEC. Why do we need to wait on the details of this transaction? These documents should not be redacted.

2. This acquisition could have a negative impact on workers in Linn, Benton, and Lincoln counties. Your public record is replete with concerns from Medicare patients. You should add to that the concerns of workers in the region who have private health care coverage. Many workers have been moving away from United Health Care and do want to go back! Unions in the region have been dropping coverage with them because of inscrutable billing practices and trouble getting medical providers paid. All of our public school district employees in the region are now covered by MODA and Kaiser through the Oregon Educator Benefits Board. How will this align when one of the two primary medical providers in the region is now owned by United Health Care--- an insurer that desperately needs to reclaim some of its market share in the region? This doesn't bode well for workers.

3. Optum/United Health Care is no Kaiser. Our portion of the Willamette Valley really stands out because for most residents, there is no feasible option to access Kaiser medical care. Some folks

will make the drive to Salem, etc., but most do not have this option. Whether you like them or not, Kaiser's presence in a region tends to drive down costs while arguably not diminishing the quality of care. If you approve this acquisition, you will be allowing Optum to set up their own Kaiser-style outpost in the region except for one thing---they're not Kaiser! They are a fledgling experiment. This experiment may not end well. We already have far too many residents who have lost their local grocery stores to Dollar General. We don't need a Dollar General-style Corvallis Clinic.

Please reject the acquisition.

Jason Foltz

Corvallis, OR

288. Subject: [Untitled]

Received 1/22/24

I am a patient of The Corvallis Clinic. It has come to my attention that people are trying to prevent the merge of the clinic with Optum. I am aware that without this merge I am likely to lose my provider and the clinic will close. This is unacceptable. Please do not interfere with this merge as it would be devastating to Corvallis Clinic health care.

289. Subject: Optum & Corvallis Clinic

Received 1/22/24

Comment on possible sale of Corvallis Clinic to Optum/United Healthcare:

Please do not allow this sale to take place. My eye doctor is part of Corvallis Clinic. My husband and I are on traditional Medicare. Once Optum takes over Corvallis Clinic, we will lose our eye doctor and there isn't another ophthalmologist available in Newport (where we live) or in Corvallis. After Optum took over Oregon Medical Group in Eugene, they went to only accepting Medicare Advantage plans (please check their website: <https://www.oregonmedicalgroup.com/>). This will happen at Corvallis Clinic, too. Please do not allow Optum to continue to squeeze traditional Medicare patients out of access to their doctors.

Ruth Craig

Michael Sydow

290. Subject: Optum

Received 1/22/24

Hello,

I'm writing to let you know that I strongly oppose the proposed Optum/UHC takeover of my local provider, the Corvallis Clinic. UHC has a deplorable track record in our area, resulting in Samaritain Health Services terminating their contract with UHC this past fall. This caused a hardship for many UHC Medicare Advantage clients in the Corvallis area, including myself and my husband, as SHS runs our local hospital. I will also add that I have received multiple cold-calls from Optum during the

past month soliciting my personal information as a Corvallis Clinic patient, and I do not appreciate their ham-handed efforts to use me as a pawn in their takeover bid.

Sincerely,

Helen Redfield

Corvallis, OR

291. Subject: Re: Re: Optum/UnitedHealth acquisition of The Corvallis Clinic

Received 1/22/24

Please do not approve Optum/UnitedHealth's acquisition of The Corvallis Clinic without a full review of the ways that this consolidation could impact the stated goals of "health equity, lower costs, increased access and better quality".

There is no evidence that such corporate mergers lead to improved quality and costs for patients, and I am concerned about UnitedHealth's focus on corporate well-being over the well-being of local community members. I understand that The Corvallis Clinic is experiencing some financial strain- but hope that there are other ways to maintain and strengthen its important role in the community.

Please, at a minimum, convene a Community Review Board

Betsy Zucker, MSN

Chair, Portland Jobs with Justice Health Care Committee

292. Subject: Against OPTUM take over

Received 1/22/24

I would like to join thousands of other Oregonians to raise my voice against the mega-corporation OPTUM taking over control of our local healthcare in Corvallis! Consolidation of medical services by profit-driven entities has been correlated with decreased affordability and availability and poorer medical outcomes for patients.

Thank you.

Chinh Le, MD

Corvallis, OR 97330

www.le-mail.org

293. Subject: Optum Oregon

Received 1/22/24

To Health Care Market Oversight,

I am writing as a concerned Oregonian about Optum Oregon taking over The Corvallis Clinic.

I do not want private corporations taking over health care in Oregon. As you know, Optum Oregon MOS is owned by UnitedHealth Group, the largest health care corporation in the country.

Health care and profit do not belong together. I know this as the daughter of a physician who took his oath to care for people seriously, irrespective of the money he earned. Indeed, he was often paid with fresh eggs, raspberries which he loved, or whatever patients of low income were able to pay.

Health care is not a privilege. It is every Oregonian's right.

Please prevent the takeover of The Corvallis Clinic, which serves patients in Albany, Lincoln City, and other towns near Corvallis. Let's keep health care local!

Thank you,

Carol Raphael

294. Subject: Optum

Received 1/22/24

Hello, I am very opposed to a takeover of Corvallis Clinic! They are local and they provide excellent services and coverage. The doctors who own Corvallis Clinic care about what all is going on with their patients. I wouldn't want to go from that to a corporate entity that is always just looking at the bottom line. Sounds simple perhaps but that's what happens and it is a sensitive situation, especially with regard to healthcare!! Please don't let this takeover go through. Sincerely, Enid Clarke Poole.

295. Subject: Optum merger with TCC

Received 1/22/24

To whom it may concern,

I am a patient of The Corvallis Clinic and it has come to my attention that there are attempts to prevent the merge between Optum and The Corvallis Clinic. This is incredibly disheartening. Without this merge many people, including myself, will lose their healthcare provider. In a time when there is already significant challenge accessing healthcare this seems unethical. Also, the number of employees that would be significantly negatively impacted without this merge would have a ripple effect in the community that I fear is not being considered. I urge you to not halt this merge as the impacts could be catastrophic for many. Thank you for your time.

Danee H.

296. Subject: The Corvallis clinic merger

Received 1/22/24

To whom it may concern,

I am a patient of The Corvallis Clinic and it has come to my attention that there are attempts to prevent the merge between Optum and The Corvallis Clinic. This is incredibly disheartening. Without this merge many people, including myself, will lose their healthcare provider. In a time when there is already significant challenge accessing healthcare this seems unethical. Also, the number of employees that would be significantly negatively impacted without this merge would

have a ripple effect in the community that I fear is not being considered. I urge you to not halt this merge as the impacts could be catastrophic for many. Thank you for your time.

Daniel Forester

297. Subject: Optum

Received 1/22/24

Dear HCMO:

I am writing today about the proposed acquisition of The Corvallis Clinic by Optum MSO. As you know, Optum is a subsidiary of UnitedHealth. They have been buying up physician practices across the country and are now the largest employer of doctors in the nation.

Actions like those proposed by United Health/Optum are known to increase costs and decrease quality and access. These corporate tactics go against the goals of the Health Care Market Oversight program established by HB2362. Especially as it relates to transparency and supporting statewide health priorities.

Health Care for All Oregon is a statewide health advocacy and education organization committed to building an equitable, affordable and simplified healthcare system in Oregon. We ask that you direct the HCMO program to conduct a comprehensive review of this proposal, including a Community Review Board.

Attached with my letter is a petition signed by over 600 Oregonians whose objections include the following concerns:

- **Corporate Interests vs. Public Health:** Optum Oregon MSO is owned by UnitedHealth Group Inc., the largest healthcare corporation in the US. Its primary responsibility is to its shareholders, focusing on maximizing profits. This business model requires prioritizing financial gains over patient welfare.
- **Impact on Local Healthcare:** UnitedHealth's record as the 10th largest corporation in the nation underscores its efficiency in generating profits. However, this comes at the cost of patient care. The takeover of The Corvallis Clinic by such a corporation will lead to increased costs and reduced quality of care for Oregonians.
- **Affordability and Accessibility Concerns:** The introduction of a mega-corporation like UnitedHealth into our local healthcare landscape raises serious concerns about the affordability and accessibility of healthcare services. Experience and history proves that corporate takeovers lead to increased costs without improving quality of care.
- **Distrust in Corporate Promises:** The statements provided by Optum Oregon MSO in their application are refuted by historical evidence. Corporate takeovers of healthcare, particularly by UnitedHealth, have not benefited public health as promised.

In light of these points, we urge you to consider the broader implications of this takeover on the health and well-being of Oregonians. We believe that healthcare should prioritize people over profits, and we strongly advocate against this takeover.

Let's keep our healthcare local, accessible, and patient-centered. Please deny the takeover of The Corvallis Clinic by Optum/UnitedHealth, or conduct a comprehensive review with a Community Review Board before any final determination is made.

Sincerely,

Maribeth Healey

Executive Director

Maribeth Healey

Executive Director

She/Her

Email: director@hcao.org

Office: (503) 206.6709

Mobile: (503)804.4061

Website: www.hcao.org

Attachment (1): [Letter version of email] Optum Letter to HCMO (1).pdf;

Attachment (2): [Letter] Petition Email_Optum_1_22_24 (1).pdf

We, the undersigned concerned Oregonians, oppose Optum/UnitedHealth taking over The Corvallis Clinic, especially without a comprehensive review. Our objections include the following concerns:

1. Corporate Interests vs. Public Health: Optum Oregon MSO is owned by UnitedHealth Group Inc., the largest healthcare corporation in the US. Its primary responsibility is to its shareholders, focusing on maximizing profits. This business model requires prioritizing financial gains over patient welfare.
2. Impact on Local Healthcare: UnitedHealth's record as the 10th largest corporation in the nation underscores its efficiency in generating profits. However, this comes at the cost of patient care. The takeover of The Corvallis Clinic by such a corporation will lead to increased costs and reduced quality of care for Oregonians.
3. Affordability and Accessibility Concerns: The introduction of a mega-corporation like UnitedHealth in to our local healthcare landscape raises serious concerns about the affordability and accessibility of healthcare services. Experience and history proves that corporate takeovers lead to increased costs without improving quality of care.
4. Distrust in Corporate Promises: The statements provided by Optum Oregon MSO in their application are refuted by historical evidence. Corporate takeovers of healthcare, particularly by UnitedHealth, have not benefited public health as promised.

In light of these points, we urge the responsible authorities to consider the broader implications of this takeover on the health and well-being of Oregonians. We believe

that healthcare should prioritize people over profits, and we strongly advocate against this takeover.

If more evidence is needed that Optum/UnitedHealth will not be able to live up to their promises, we believe it meets the criteria for conducting a comprehensive review under ORS 415.501, since there is certainly potential to have a negative impact on access to affordable care in Oregon, and it also meets the criteria for convening a Community Review Board.

Let's keep our healthcare local, accessible, and patient-centered. Please deny the takeover of The Corvallis Clinic by Optum/UnitedHealth, or conduct a comprehensive review with a Community Review Board if more evidence is needed.

Sincerely,

Joan Adams, Ashland

Karen Adkins, Eugene

David Alba, Philomath

Linda Alband, Portland

Burt Alber, Philomath

Christine Albrecht, Eugene

Rita Alder, Newport

Jamie Alexander, Portland

Jo Alexander, Corvallis

Karen Alexander-Brown, Beaverton

SETH ALKIRE, Salem

Diana Allen, Corvallis

Megan Allen, Corvallis

Stuart Almand, Forest Grove

Timothy Almgren, Corvallis

Janice Ames, Corvallis

John Anderson, Oregon City

Malcolm Anderson, Philomath

Jessica Andrade, Philomath

Brenda Andresen, Corvallis

Ronald Anteroinen

John Ardner, Gresham

Susan Aronson, Corvallis
Deren Ash, La Pine
Margaret Ashmore, Clackamas
Rachael Atchison, Salem
Levon Atwood, Monroe
Cheryl Babb, Corvallis
Karen bailey
Carolyn Bales, Corvallis
Charlotta Ball, Hillsboro
Vicki Ballentine, Philomath
Michael Bandfield, Klamath Falls
DAWN BANKS, Salem
Roger Barber, Monmouth
Kyle Barclay, Beaverton
Sheila Barnes, McMinnville
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298. Subject: Optum

Received 1/22/24

The people in Oregon do not Want or Need to have our Health Care taken away and no longer available to those of us who are dealing with dire poverty. We could never afford to pay any more money than we are already suffering to submit.

Please do NOT continue this dire agenda.

299. Subject: Optum

Received 1/22/24

Dear Oregon Health Authorities Board members,

I am writing to you today in hopes you will not allow the take-over of Corvallis Clinic in Corvallis, OR by Optum/United Health Care.

As you may already know, Samaritan Hospitals and associated health care providers are no longer accepting United Health Care Medicare patients due to many things but mostly tardy and low reimbursements by UHC to doctors, clinics, laboratories, and hospitals. With that kind of black-eye reputation, do you think it wise to unleash this entity onto the Corvallis and surrounding area patients by allowing the take-over of the Corvallis Clinic by Optum/United Health Care???

The most infuriating aspect of dealing with United Health Care was that they refused to pay for my Armour Thyroid medication. This medicine has been proven safe and effective for decades yet UHC refused and still refuses to assist with pharmaceutical costs for Armour mostly because it's not listed as an approved Medicare drug. Samaritan Health Care pays 50% of the cost of Armour Thyroid. They don't have an issue with keeping their prescribers safe and healthy.

And can you imagine my outrage when a United Health Care representative called me to tell me about their program where you receive "Brownie Points" if you have a social experience like volunteering somewhere or going for coffee with someone???. Seriously?!? My health care dollars wasted on a totally useless program. I was furious our pittance of health care funding was being squandered by United Health Care. And as far as UHC being endorsed by AARP. Well, that approval by AARP carries no importance to me because AARP sold out millions of seniors to the pharmaceutical companies years ago instead of using their membership numbers to get medication costs reduced. Shame on AARP and Optum/United Health Care. They are just another large conglomerate putting profits before people. Please do not allow this merger to happen with the Corvallis Clinic.

Nancy Rohn, Corvallis, OR

About HCMO

The Health Care 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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