

July 29, 2026

U.S. Department of Justice
Antitrust Division
Healthcare and Consumer Products Section

Re: Request for Expanded Antitrust Review of OhioHealth's Impact on Ohio Communities

Dear Assistant Attorney General,

On behalf of the Ohio Nurses Association, representing thousands of registered nurses and health professionals across Ohio, I write to urge the Department of Justice to broaden its scrutiny of OhioHealth's conduct and the impact its market power is having on patients and communities throughout our state.

The Department has already concluded that Ohio Health engaged in anticompetitive contracting practices significant enough to warrant federal enforcement action and a proposed settlement requiring the system to abandon contractual provisions that restricted competition and to operate under years of compliance monitoring.¹

While that case focused on commercial contracting practices, we believe a larger question deserves examination:

How is OhioHealth's growing market power affecting access to essential healthcare services for the communities it serves?

The recent decision to close inpatient maternity services at Grady Memorial Hospital raises serious concerns. Delaware County is one of Ohio's fastest-growing counties, yet Ohio Health has chosen to eliminate local labor and delivery services despite continued community need. Families will now be forced to travel farther for obstetric care during one of the most critical moments of their lives. In some cases, it could take up to 50 minutes to travel to a hospital that has a safe labor and delivery unit.² These increased travel times are highly correlated with poor maternal and fetal outcomes.

This reduction in services at Grady Memorial Hospital is just the latest in a series of closures across the state of Ohio. Since 2018, twenty-five inpatient labor and delivery units have shuttered deepening the existing maternal and infant health crisis in the state. According to a recent report by the Center for Health Quality & Payment Reform, only 22% of rural hospitals in Ohio offer labor and delivery services.³ Recent cuts to federal funding pose additional threats to our communities.

Healthcare systems frequently justify acquisitions, affiliations, and market expansion by promising stronger local healthcare, improved access, and long-term investments in communities. When dominant systems later reduce or eliminate essential services after competition has diminished, communities are left with fewer choices and less leverage.

From the perspective of frontline nurses, this creates a troubling pattern:

- Communities lose independent healthcare options.
- Market concentration increases.
- Essential services are centralized or eliminated.
- Patients travel farther.
- Healthcare workers leave their communities.
- Local hospitals become shells of what they once promised to be.

3510 Snouffer Road, Columbus, Ohio 43235
www.ohnurses.org
614-969-3800

The result may not simply be higher prices—it can also be reduced access, diminished quality, weakened workforce stability, and fewer competitive alternatives for patients.

Healthcare is unlike most industries. When labor and delivery closes, families cannot simply “shop elsewhere.” Delays in care carry real clinical consequences. Rural and suburban communities deserve more than assurances that services are available somewhere else within a health system’s footprint.

We respectfully request that the Department examine whether Ohio Health’s pattern of acquisitions, market consolidation, and subsequent service reductions warrants additional antitrust review under the broader public interest goals of preserving competition and protecting consumer access to healthcare.

Specifically, we ask the Department to consider:

- Whether consolidation has reduced meaningful healthcare competition in affected communities.
- Whether commitments made during expansion or affiliation have been fulfilled.
- Whether dominant market position enables service reductions that would not occur in a competitive marketplace.
- Whether patients, employers, and communities ultimately suffer diminished access despite increased market concentration.

The Ohio Nurses Association stands ready to provide the perspective of frontline nurses and health professionals who witness these consequences every day. Nurses and health professionals understand better than anyone what happens when critical services disappear—not on a balance sheet, but in emergency departments, ambulances, labor rooms, and at patients’ bedsides.

Competition policy exists to protect the public. In healthcare, protecting competition must also mean protecting access.

Ohio communities deserve healthcare systems that invest in them—not simply acquire market share and later withdraw essential services.

We appreciate your consideration and would welcome the opportunity to discuss these concerns further.

Respectfully,



Rick Lucas BSN, RN, CCRN
ONA President & Executive Director

References:

1. https://www.justice.gov/opa/pr/justice-department-requires-ohiohealth-stop-using-anticompetitive-healthcare-contract-terms?utm_source=chatgpt.com
2. https://newsroom.ohiohealth.com/ohiohealth-announces-updates-to-maternity-and-womens-health-services-at-ohiohealth-grady-memorial-hospital/?utm_source=chatgpt.com
3. https://ruralhospitals.chqpr.org/downloads/Rural_Maternity_Care_Crisis.pdf

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