REALD & SOGI Data Collection and Submission FAQs for CCOs, Insurers, and Data Submitters

Background

This Frequently Asked Questions (FAQs) document is designed to provide guidance on the submission and reporting of REALD (Race, Ethnicity, Language, and Disability) & SOGI (Sexual Orientation and Gender Identity) data to the All Payer All Claims (APAC) program as required by the Oregon Health Authority (OHA). Developed in collaboration with the Equity and Inclusion Division (E&I), it addresses key questions raised by insurers and Coordinated Care Organizations (CCOs) during meetings. While its primary focus is on data submission and reporting, it also provides some guidance on data collection to support compliance with state standards. Please see the OHA E&I FAQ for Health Care Providers for additional information.

Overview and Compliance

1. What is REALD & SOGI?

REALD (Race, Ethnicity, Language, and Disability) and SOGI (Sexual Orientation and Gender Identity) are demographic data collection standards mandated by the Oregon Health Authority (ORS 413.161). These standards aim to address health inequities and promote data justice in communities disproportionately impacted by health disparities. For more information and resources on REALD & SOGI and their associated data standards, visit the Equity and Inclusion Division's REALD & SOGI webpage here.

2. Who is required to collect and submit REALD & SOGI data?

All insurers and all CCOs must begin collecting and reporting REALD & SOGI data for their members starting January 31, 2026 (2025 Q4). APAC is initially requiring insurers and CCOs to report because both are subject to reporting requirements under ORS 413 and ORS 442.

REALD data collection has been mandated in state programs since 2013. In 2021, E&I gained the authority to collect data directly from entities identified in ORS 413.164. This requirement supplements the mandate for state agencies to use REALD (now REALD & SOGI) standards under ORS 413.161(3).

Until 2023, APAC law required the collection of race, ethnicity, language, and disability data using national standards, while other state programs followed REALD standards. The 2023 update aligned APAC's data collection with state law (specifically ORS 413.161), requiring all APAC reporters to adopt REALD & SOGI standards across all lines of business. Additional reporting entities will be phased in over the coming years, with formal rulemaking clarifying reporting responsibilities and timelines.

3. When does REALD & SOGI data submission to APAC begin?

The first data submission deadline to APAC is January 31, 2026, followed by quarterly submissions of new or updated data. Insurers and CCOs are expected to begin collecting data before this date. Unlike claims files, APAC does not expect to receive previously reported data each quarter. Only new information received from the member should be submitted each quarter.

4. Will insurers be required to meet specific thresholds for data completeness when submitting REALD & SOGI data?

No, specific thresholds for data completeness are not currently required. The only exception is identifying the entity submitting the data (payer) and the individual the data pertains to (member). All other data fields detailing race and ethnicity, disability, language, sexual orientation and gender identity will not have error thresholds. APAC's current focus is on structural accuracy rather than survey response. Insurers should make good-faith efforts to collect and submit data while working with E&I to improve response rates over time. We encourage insurers and CCOs to engage with the provider training, tools, and resources E&I has created to prepare and inform their members about REALD & SOGI.

Survey Administration and Collection

5. Do Medicare Advantage Plans need to survey members for REALD and SOGI data?

Yes, Medicare Advantage insurers will eventually need to survey members for REALD & SOGI data, but not yet. The requirement will be implemented in the future.

Although excluded from direct reporting to Equity and Inclusion under ORS 413.164, all APAC mandatory reporters will need to collect REALD and SOGI data

because APAC is required to collect the demographic data using those standards under ORS 413.161 and ORS 442.373. APAC will provide more information about expectations and timelines for Medicare Advantage reporters soon.

6. Are all members included in data collection requirements?
Yes, the requirement applies to both Medicare Advantage and Medicaid members. Data should be collected during enrollment and updated annually.

7. What methods can insurers use to collect data?
Surveys may be distributed via paper, electronic means (e.g., member portals, apps), or other secure methods. Insurers must ensure compliance with REALD & SOGI standards and protect member privacy. E&I has developed resources with standards and templates, available here. Additionally, the REALD & SOGI Data Dictionary provides guidance based on collection methods. For example, electronic surveys can allow members to choose from a list of specific languages or accommodations rather than relying on open-text boxes.

8. How often must surveys be disbursed, and what are the follow-up requirements?
Surveys must be disbursed annually. If no response is received, one follow-up reminder must be sent within 30 to 60 days, in accordance with OAR 950-030-0020 (13).

9. Are there limits on the number of attempts to contact members?
APAC rules will propose a minimum of two contact attempts (initial and one follow-up). However, insurers may use additional opportunities during regular member interactions to encourage participation.

10. What happens if members decline to answer?
Surveys include options like "Don't want to answer." Insurers must report all data collected, even if incomplete. Refer to OAR 950-030-0020 (6) (a) for more information on response options.

11. Are there recommendations for improving response rates while managing survey costs?
While E&I is not able to provide recommendations related to fiscal impact, response rates can be improved through member education and staff training on REALD & SOGI data collection. Please view the Provider/Partner Resources page for more information or reach out to the E&I Team for support.

12. How will insurers know if a member has already completed the survey elsewhere, such as a provider's office?
Currently, it is not possible to provide information about an individual's REALD & SOGI survey response status to insurers or CCOs. E&I'S REALD & SOGI Team will explore solutions for this issue.

13. Can completed REALD & SOGI survey responses collected at a provider's office be used to report to APAC?
Yes, E&I will connect member responses from various sources on the backend. Insurers are not responsible for identifying duplicate responses.

Data Submission and Reporting

14. What is the format for data submission?
Data will be submitted in a flat-file format through the APAC Data Submission and Quality Portal, similar to quarterly claims submissions.

15. Will there be a guide for data mapping?
Yes, once finalized through the formal RAC process in Spring 2025, the finalized Appendix J file layout, which references the E&I data dictionary, will guide insurers in aligning data with submission requirements.

16. What guidance will be provided for mapping existing data to REALD & SOGI standards?
Demographic data collected using non-REALD & SOGI standards (for example, race and ethnicity information collected using OMB race and ethnicity categories) should not be reported under REALD & SOGI requirements (to review the REALD & SOGI standards, refer to Oregon Administrative Rules 950-030-0000 through 950-030-0060). OHA is developing resources for requestors to use REALD & SOGI data to meet external reporting requirements. When published, resources can be found in the REALD & SOGI Implementation Guide. Please contact the E&I REALD & SOGI Team for technical assistance.

17. Can pre-existing data, such as information found in EHR systems or other sources, be used to fill gaps in survey responses?
No. Members must self-report REALD & SOGI data using the standardized survey format, and it must be collected directly from them. All members must

be asked all of the REALD & SOGI questions, following skip logic specified in the [templates](#) and standards.

18. What happens if members submit surveys but are no longer active members at the time of submission?

Data collected within the annual reporting timeline should still be submitted, even if the member is no longer active.

19. Are insurers required to submit all member records or only completed surveys?

Only completed surveys (i.e., surveys that were returned with at least one question response) need to be submitted. Do not send a row in the data file for a member who has not responded to the survey.

20. Are there plans for APIs or real-time data submission?

Discussions about transitioning to APIs for real-time data exchange are ongoing, but current submissions will follow flat-file formats.

21. What specific API or technical integration options will OHA provide to insurers?

OHA is currently exploring options for API or technical integration. Insurers and CCOs are encouraged to [join our listserv](#) for updates.

Support and Resources

22. What resources are available to support data collection and response rates?

The E&I Provider Engagement team has developed a variety of templates, tools, and communication materials to assist providers, insurers, and CCOs in improving data collection and response rates. These resources can be accessed [here](#). Additionally, the E&I REALD & SOGI team is available to answer questions via their inbox at OHAREALD.Questions@odhsoha.oregon.gov.

E&I and APAC are collaborating on a cover sheet that will accompany the REALD & SOGI survey. The cover sheet will inform members that the survey is from OHA, explain the importance and purpose of REALD & SOGI data, and outline the security measures in place to protect their information. This resource will be

available to insurers and CCOs by October 1, 2025. Updates and further information will be provided throughout the year.

23. Can insurers customize the survey template?

Yes, insurers and CCOs can customize the survey templates by adding their own branding and including additional questions, as long as the core format and sequence remain intact. However, all of the REALD & SOGI questions must follow the exact wording and skip-logic of the REALD & SOGI templates and minimum standards as outlined under ORS 413.161(3).

24. Who should insurers contact for additional support?

Any REALD & SOGI data submission questions can be directed to the APAC admin inbox at APAC.Admin@odhsoha.oregon.gov. For guidance on survey content and distribution, the E&I team can be contacted at OHAREALD.Questions@odhsoha.oregon.gov, or you can submit a training and technical assistance request through this link.