

## Memorandum

**To:** CCO Metrics Technical Advisory Group (TAG)

**From:** Valerie Stewart, OHA Metrics Manager and Heidi Beaubriand, Health & Wellness Services Program Manager, DHS

**Date:** April 8, 2020

**Subject:** COVID-19 and CCO Incentive Metrics

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Thank you to our CCO partners for all the work you are doing to address the COVID-19 pandemic and protect the health of all Oregonians.

We know that this time is difficult for everyone, and there are questions about the CCO Quality Incentive Program. As noted in the communication shared with CCOs [on 27 March 2020](#), in response to the pandemic OHA evaluated sources of funding that could be released quickly to support the needs across Oregon to prepare for the surge in patients needing care, maintain capacity, and ensure access to care across the delivery system. The monies used to fund the CCO Quality Incentive Program (these funds are called the ‘quality pool’) have been leveraged to meet this urgent need. Specifically:

- Early release of 60% the 2019 Quality Pool Fund in late March 2020.
  - The remaining 40% of the 2019 quality pool funds will be paid out in June 2020 based on the regular 2019 calculation, less quality pool funds already received in March.
- Suspension of the 2020 Quality Withhold during the emergency.

We are also aware that this raises questions about metrics being tracked for 2020 given the pandemic disruption in the system, particularly for measures of preventive and dental services that are currently being suspended or shifted from in-person to telemedicine as appropriate. OHA’s Office of Health Analytics is monitoring the impact to the metrics, as well as decisions made by external stewards of incentive metrics in regard to telemedicine, and will create options and proposals for consideration by the Metrics & Scoring Committee, which makes final decisions about the measures and targets included in the Quality Incentive Program. This will occur at a later date, when more data are available on COVID-19 impact on performance. This also allows time for OHA to consult with CCOs on these recommendations via the CCO Metrics Technical Advisory Group (TAG).

In the interim, we know that there are questions regarding specific metrics, and OHA intends to address those questions to the extent it can during the crisis, bearing in mind that per statute final

decisions about the metrics and targets in the program are made by the Metrics & Scoring Committee, not OHA. As we know everyone is extremely busy during this time, OHA will endeavor to send all communications to the TAG for a given week in a single email.

### **OHA COVID-19 Webpage for Providers and Health Plans**

CCOs and providers are encouraged to make use of OHA's COVID-19 webpage:

<https://www.oregon.gov/oha/HSD/OHP/Pages/COVID-19.aspx>. This page includes guidance, updates, and references; please check back often. Given questions about telemedicine, CCOs can reference the materials from the [Provider Information Session](#) on Telemedicine OHA hosted on 6 April, which included links to these additional resources:

- [Provider fact sheet](#) about telemedicine coverage changes
- [DCBS-OHA Telehealth Guidance](#)
- [OAR 410-130-0610 Telemedicine](#)
- [Prioritized List of Health Services](#), Effective 3/13/2020
- [Guideline Note A5](#) -Teleconsultations and electronic/telephonic services
- [Statement of Intent 6](#) -Telephonic services during an outbreak or epidemic
- [Behavioral health fee schedule](#)

Non-metric-specific questions can also be sent to [covid19@dhs.oregon.gov](mailto:covid19@dhs.oregon.gov); OHA's Health Systems Division will work quickly to post questions and answers on the webpage above.

Guidance and policy changes such as the changes noted in the Telehealth Provider Information Session will be considered as OHA prepares its recommendations to the Metrics & Scoring Committee on any changes to the 2020 Quality Incentive Program needed in light of the pandemic.

### **Assessments for Children in DHS Custody**

Given the vulnerability of children in foster care, OHA has received numerous questions about this particular measure. We understand that telemedicine visits are being implemented for physical and mental health assessments for foster children where possible, and such visits would be counted in the metric. However, we have also heard from our CCO partners that there are areas in which physical health assessments have been cancelled outright, and that in some cases the mental health assessment is only being performed if the mental health provider is holding office hours or the foster family has access to a device with a camera as these visits have to be done with visual contact/video. As of April 6<sup>th</sup> restrictions are lifted for telemedicine (see webinar above), and all licensed physicians and nonphysicians can perform services within their scope of work via telemedicine, with billing data including the proper place of service or modifier codes. However, OHA will assess whether prior restrictions could have created barriers for cases in terms of meeting the assessment completion period. There are also new codes available for telemedicine and OHA will assess whether the services included in the new codes align with the assessments required for this measure.

In terms of how the metric will ultimately be evaluated, as noted above, that decision must be made by the Metrics & Scoring Committee. As part of its work in monitoring the impact of the pandemic on *all* 2020 incentive measures and in preparation of recommendations to the Metrics & Scoring Committee, OHA will work with the TAG to identify whether it would be appropriate to recommend continuing this specific measure for 2020 given the high priority of this population, but in an altered

fashion (e.g., excluding the dental component for the year). However, a decision on these metrics will take time as data will be needed so that the Committee can make informed decisions, and to ensure CCOs and other partners are consulted in options presented to the Committee.

External to the metric considerations, OHA consulted our partners at DHS, including the Child Welfare Health & Wellness Services Program manager, who advises that CCOs continue their efforts to ensure children entering foster care during the pandemic receive the vital health assessments the metric is meant to incentivize as below:

- Schedule telemedicine (video) appointments for both physical and mental health assessments whenever possible.
- DHS advises that dental assessments for foster children should not be done via video conferencing; full in-person evaluation is needed. Therefore, these should be scheduled as office visits at a later date once all restrictions are lifted.

OHA is committed to working with the CCOs other relevant partners in creating recommendations for the Metrics & Scoring Committee that consider the impact of the pandemic's health system disruptions on CCO performance on this and other measures. We know the health and safety of these vulnerable children is of the utmost importance to our CCO partners and urge CCOs to pursue care for these children as directed by DHS above, and look forward to working together to address COVID-19 impacts on the Quality Incentive Program.

### **For More Information**

If you have additional thoughts or questions, please email us at  
[metrics.questions@dhsoha.state.or.us](mailto:metrics.questions@dhsoha.state.or.us).