

April 16, 2025

Re: Official Notice of Designation of Cost Growth Target Program Mandatory Reporter  
Status – ACTION REQUIRED

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Hello,

Per Oregon Administrative Rules 409-065-0010, this letter serves as written notification that your organization has been identified by the Oregon Health Authority (OHA) as a mandatory reporter to the [Sustainable Health Care Cost Growth Target Program](#) for data submission in 2025. Mandatory reporters are payers and licensed third-party administrators with at least 1,000 covered lives in Oregon across all required lines of business (commercial, Medicare, and Medicaid).<sup>1</sup>

The latest health insurance enrollment data from the Oregon Division of Financial Regulation and the Oregon Health Authority indicate that your organization is a mandatory data reporter and is subject to Oregon's Cost Growth Target Program reporting requirements in 2025 (see attachment [2025 Cost Growth Target Payer List](#)).

If your organization received a waiver for Cost Growth Target Program reporting requirements for the 2024 data submission, please contact us at [HealthCare.CostTarget@oha.oregon.gov](mailto:HealthCare.CostTarget@oha.oregon.gov) in the next 30 days to confirm your status for 2025.

Established by Senate Bill 889 (2019), the Cost Growth Target Program sets a target for the annual per capita rate of growth for total health care spending in Oregon. OHA administers the program as specified by Oregon Revised Statutes 442.385, 442.386 and Oregon Administrative Rule 409-065. The program uses annual data submissions from data reporters to monitor and report on health care spending in the state. More information about the [program](#) and additional guidance for [data reporters](#) is available online.

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<sup>1</sup> If the only individually reportable line of business a payer or TPA has in Oregon is Medicare Advantage; and, if the number of Medicare Advantage covered lives in Oregon is less than five percent of the total Medicare Advantage market in Oregon, the payer or TPA will not be considered a mandatory reporter and will be invited to submit data as a voluntary reporter.

The 2025 data submission for the Cost Growth Target Program must include data from January 1, 2023 – December 31, 2024, and must be submitted to the Oregon Health Authority by **September 5, 2025**.

Data reporters must submit data for all required lines of business (commercial, Medicare, Medicaid) and may voluntarily submit data for self-insured plans subject to ERISA. Other lines of business are excluded and should not be reported (e.g., disability, supplemental, stop-loss, workers' compensation, among others).

The data submission template and specifications for data submission will be finalized in May of 2025. Reporters are invited to participate in the [monthly Cost Growth Target Technical Advisory Group \(TAG\)](#) where the data submission template, specifications, data submission process, and validation topics are discussed (next meeting: April 23<sup>rd</sup> at 10 AM Pacific time). OHA will provide notification to all data reporters when the 2025 data submission template and specifications manual are published.

Mandatory reporters receiving this reporting notification should email OHA ([HealthCare.CostTarget@oha.oregon.gov](mailto:HealthCare.CostTarget@oha.oregon.gov)) an organization contact(s) name, role, telephone number, and email **by May 15, 2025**. If there are no changes from your 2024 organizational contact(s), please email to confirm so.

OHA will make data reporting training and technical assistance available this summer. OHA will provide more information to all designated organizational contacts.

If you believe your organization does not meet the criteria for mandatory reporter status in 2025, please contact the Cost Growth Target program in the next 30 days by email at [HealthCare.CostTarget@oha.oregon.gov](mailto:HealthCare.CostTarget@oha.oregon.gov) to discuss.

If you need more information on anything outlined in this letter, please contact the Cost Growth Target program by email at [HealthCare.CostTarget@oha.oregon.gov](mailto:HealthCare.CostTarget@oha.oregon.gov).

Sincerely,



Sarah Bartelmann, MPH  
Cost Programs Manager  
Oregon Health Authority