Technical Specifications for HCMO Submissions

This document describes technical specifications for submitting documents to Oregon Health Authority's Health Care Market Oversight (HCMO) program. Following the instructions in this document will help ensure a smooth and efficient submission review process, as well as avoid technical issues that may cause delays in reviewing a submission. Contact us by email at hcmo.info@oha.oregon.gov or by phone at 503-945-6161 with any questions.

How to Submit

Submissions may be sent via email or a secure file transfer site hosted by the submitting entity. OHA also has a secure file transfer site that can be utilized if needed; please contact hcmo.info@oha.oregon.gov to request access.

Technical Specifications for All Submissions

Submissions that do not meet the specifications listed below may require a resubmission.

- Responses to the HCMO-1 form, excluding referenced exhibits, must be entered directly on the HCMO-1 form and not as a supplemental appendix unless necessary to include confidential information (see "Requirements for Confidential Information" below).

- Apply Bates numbering to all documents submitted as supplemental materials that are not HCMO forms.

- Submit forms and exhibits as separate files; do not combine multiple exhibits into a single PDF.

- Name documents with a file name that contains the Bates number of the first page of the document. Aim to keep file names as short as possible, preferably under 60 characters.

- Do not nest documents within subfolders, except for submitting documents in separate folders for public and confidential versions of documents (see below).

- Each submission must include a document index that identifies each file submitted, the Bates number range for each file, and the title of the document. This allows OHA to ensure that we have received everything you intended to include in the submission. A suggested document index template is available on our website.

- PDFs must be produced in their native, searchable form. Do not produce PDFs as scanned documents unless that is the only existing version of that document.

- Use a 12-point, black font for responses provided in HCMO forms and supplemental requests for information. Use italicized, bold, underlined, or highlighted text sparingly and only for emphasis. Do not use italic, bold, or underlined formatting for large blocks of text.

Requirements for Confidential Information

If designating any information as confidential under OAR 409-070-0070, entities must submit two sets of documents: 1) a confidential, unredacted set and 2) a public set with appropriate redactions applied. Submissions that do not meet the requirements below may require a resubmission.

- The HCMO-1 form must not include any confidential information. If confidential information is required to respond to a HCMO-1 item, please include that information in a supplemental appendix. The public portion of each response must still be on the HCMO-1 form and each HCMO-1 item requires a public-facing response.

- If submitting via file transfer site, upload the submissions in separate folders labeled "Confidential" and "Public."

- Use the same Bates numbers for both the public and confidential submissions.

- Mark documents as "confidential" or "public" in the header or footer on each page of the document.

  - If public versions of documents contain pre-existing confidential stamps in the original document, they must be removed or covered up in a manner that does not cause confusion as to whether a document is public or confidential.

  - Do not add a confidential label to any documents that do not contain confidential information.

- Include a confidentiality designation in the file name in addition to the Bates number for confidential documents. For example, "HCMO_EntityA-00023_Conf."

- If a document is redacted in its entirety, provide a cover sheet with a public-facing title for the document in the public submission in lieu of producing the entire document with each page entirely redacted.

- The submission must include a redaction log that provides a reasonably detailed explanation of the grounds for confidentiality, citing the applicable statutory basis for confidentiality of each portion.

- Submit the redaction log as an Excel file using the redaction log template available on the [HCMO website](#).

- The redaction log must be updated and resubmitted, as warranted, each time submission materials are provided to OHA. Do not provide multiple, separate redaction logs for a single transaction review.

- If you wish to assert that any redacted information qualifies for the ORS 192.345(2) trade secret exemption under Oregon Public Records Law, you must explain why the information is considered trade secret in the redaction log. Your explanation must include at least the following:

1. Internal steps the parties have taken to keep the information secret;

2. To the extent the information is, by necessity, shared with or known by outside parties, the steps taken to ensure that these parties keep the information secret;

3. How the information would be economically valuable to a competitor or could be used to economically harm the entity; and

4. The time, effort, and expense needed to compile the information.

- If any party to a transaction wishes to consider submitted materials confidential and to keep such information confidential and protected from other parties to the transaction, OHA will accept separate submissions. Please take the following steps:
  - Notify OHA via hcmo.info@oha.oregon.gov;
  - Include an explanation in the redaction log; and
  - Mark all submitted materials that are to be held separate as "Highly Confidential: OHA's eyes only."

- If you wish to withhold any information due to attorney client privilege, you must include this information in the redaction log.