

Memorandum

To: Oregon Coordinated Care Organizations (CCOs)

From: Chris DeMars, Delivery System Innovation Office Director
David Baden, Chief Financial Officer

Date: Sept 9, 2022

Subject: Changing SHARE Initiative spending designations

OHA received and reviewed the first year of CCO SHARE Spending Reports. OHA is impressed by the type and scope of community investments CCOs are making in and with the communities they serve across Oregon. It is clear that the SHARE Initiative has allowed for innovative investments in the social determinants of health and health equity with federal/CMS funding that is not possible via other spending pathways. All CCO SHARE spending reports are approved or are in the process of being approved with minor requested corrections. The 2022 SHARE Initiative spending reports will be posted to the [OHA SHARE webpage](#) once all reports are approved and the redaction period has ended.

As part of the recently submitted SHARE Initiative spending reports and Exhibit L reports (June 2022), three CCOs reflected changes in their SHARE designation from what they originally committed in their 2020 Exhibit L reports and 2021 SHARE spending plans. **OHA would like to clarify expectations, reporting and documentation of changes in SHARE designation amounts:**

- Each year CCOs designate the amount they plan to invest in the community through SHARE based on prior year net income and reserves. This designation should be made based on the most accurate and current financial data and information from community partners.
- CCOs are expected to honor their financial commitment (designation) to community partners through SHARE and consider the impact of a funding change before doing so.
- OHA expects the CCO's dollar amounts and partners in their SHARE spending report to match what they committed or designated in their corresponding SHARE spending plan.
- CCOs have three years to spend each year's SHARE designation amount.

- If a CCO chooses to change their *total* SHARE designation amount for any reason, they must notify OHA of the change via:
 - **An email memo** to Transformation.Center@odhsoha.oregon.gov, describing the financial change, rationale for the change and the community impact of the requested change, including specific partners affected by the change. CCOs should include updated partner MOUs if they're impacted by the CCO's change in SHARE designation.
 - The **SHARE spending report** must reflect the new/changed designation.
 - An amended **SHARE spending plan** must be submitted and reflect the new/changed designation
 - **Exhibit L** should only reflect SHARE designation changes that have been previously submitted and approved by OHA and received no later than the original due date of the CCO audited financial reports, June 30.
- Once the SHARE spending formula goes into effect (affecting 2023 spending plans based on 2022 financials), CCOs may not reduce their SHARE designation below their required minimum contribution. For more details about the formula, see the [SHARE guidance document](#).
- If a CCO changes their SHARE designation amount, OHA is obligated to post publicly the changed SHARE designation to maintain transparency. All SHARE reporting, including designation changes, will be posted to the [SHARE Initiative reports webpage](#).

