



HEALTH SYSTEMS DIVISION

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Date: September 12, 2020
From: Lori Coyner, Medicaid Director
To: Coordinated Care Organizations (CCOs)
Re: FAQ for CCOs related to fire response and evacuations

OHA is grateful for the rapid engagement with Oregon Health Plan members by CCOs and local public health authorities during the current wildfire emergencies and evacuations. This partnership is vital to keeping our members safe and healthy during and after the crisis.

On September 9, 2020, Governor Brown requested Federal approval of Oregon's emergency declaration. Approval was granted by the Federal government on September 10, 2020.

<https://www.fema.gov/disaster/3542>) The approval of the Declaration ordered Federal assistance to supplement State, tribal, and local response efforts due to the emergency conditions resulting from wildfires beginning on September 8, 2020, and continuing. Specifically, FEMA is authorized to identify, mobilize, and provide at its discretion, equipment and resources necessary to alleviate the impacts of the emergency. Emergency protective measures, including direct Federal assistance, will be provided at 75 percent Federal funding. CCOs should keep detailed records and documentation of expenditures related to the fire response for FEMA reimbursement purposes. If FEMA reimbursement is not available for these expenditures, detailed records are needed for credit toward Health Related Services.

CCOs are highly encouraged to engage and communicate regularly with your local county incident management teams (IMT) and county emergency managers. Innovator Agents will help facilitate connections with the OHA Regional Emergency Coordinators where needed.

In response to questions posed by CCOs during this emergency response, the Medicaid team has prepared the following FAQs. Updates to this FAQ will be made and posted as additional information is obtained. We will be working closely with the Innovator Agents (IAs) to rapidly disseminate information and to collect and answer CCO's questions as quickly as possible. Please note: [the FAQ document](#) will be revised and disseminated often to reflect changes in the crisis response.

How do CCOs connect with local incident management teams?

CCOs must connect with their local county and Tribal emergency preparedness departments, specifically county and Tribal emergency managers. Contact information can be found at:

https://www.oregon.gov/oem/Documents/locals_list.pdf

How do CCOs receive reimbursement for expenditures made toward local and Tribal emergency management efforts?

Currently, the best steps to take are to work with your local county and Tribal emergency management team and keep thorough documentation of resources dedicated toward assistance with the local emergency management effort (staff, supplies, expenses, etc.). It is imperative that CCOs have these resources documented so they can be reimbursed by FEMA or for credit toward Health Related Services.

What can we do for evacuated members who had to leave behind durable medical equipment (DME), medical supplies, and/or prescription medications?

OHA has released guidance to CCOs regarding what to CCOs should do in these situations. The guidance can be found at: <https://www.oregon.gov/oha/HSD/OHP/Announcements/replacement-dme-rx-091020.pdf>.

Regarding prescription medications, the Board of Pharmacy, Public Health Emergency, Oregon Administrative Rule (OAR) ([855-007-0090](https://www.oregon.gov/oha/HSD/OHP/Announcements/replacement-dme-rx-091020.pdf)) refill rules permit a pharmacist to dispense a refill of a prescription drug without a valid prescription provided when certain criteria are met. Note: The DEA has not suspended any regulations related to the scheduling of Controlled Substance (CS) drugs, therefore a pharmacist may not dispense a refill of any CS medication without prescriber authorization.

For your members who are on a CS, please identify and work with them to quickly obtain a prescription when necessary due to evacuation or other reasons related to the fire emergency.

Can CCOs use Health Related Service (HRS) funds for members who need items such as glasses/contacts, food, diapers, air filters due to evacuation?

HRS funds apply to providing members personal hygiene supplies, clothing, food, air filters, etc. during the fire emergency if those expenditures cannot be reimbursed by FEMA.

CCOs are encouraged to contact their local county emergency managers for assistance related to clothing and personal hygiene. CCOs should keep detailed records and documentation of these expenses and work with your county emergency managers to have these expenditures reimbursed through FEMA. HRS apply to items provided to members during the fire emergency response paid for from your capitated rates only and that are not subject to FEMA reimbursement.

Can CCOs pay for evacuated members' stays in alternative settings, i.e. hotels? For how long?

These funds will come from local IMTs. CCOs need to work with your county emergency response manager to request FEMA funding. If FEMA reimbursement is not available for certain expenditures, these expenditures can be counted as HRS paid for from your capitated rates only. The duration is the end of the quarter that Governor Brown ends the emergency declaration.

Can CCOs use their resources to clean up a members' property that is still standing but needs extensive restoration services before it can be re-inhabited?

These funds will come from local IMTs. CCOs need to work with your county emergency response manager to request FEMA funding. If FEMA reimbursement is not available for certain expenditures, these expenditures can be counted as HRS paid for from your capitated rates. The duration is the end of the quarter that Governor Brown ends the emergency declaration.

Getting medications and oxygen, along with items such as clothing and personal hygiene supplies, to displaced members seems to be the greatest need. Are there other resources available to assist?

CCOs are encouraged to partner with local county and Tribal emergency managers, for assistance related to clothing and personal hygiene. Contact information can be found at:

https://www.oregon.gov/oem/Documents/locals_list.pdf. Additionally, CCOs should connect with local CBOs as partners.

How can CCOs assist with the safe evacuation of vulnerable members?

OHA highly recommends that CCOs use claims and other data to identify vulnerable members (i.e. members with mobility issues, lack of transportation, severe respiratory conditions that may be aggravated by poor air quality, etc.) during the fire emergency and work with local emergency response in identifying these members. OHA strongly suggests that CCOs proactively communicate with members who are receiving intensive case management or who have other special needs during and after evacuation and the fire emergency.

Can CCOs provide pet and livestock assistance to members who are required to evacuate?

OHA and CCO resources cannot be used for animal food, supplies, boarding or veterinary care. However, CCOs can assist members in reaching out to resources in their county for assistance with pets and livestock care, specifically county emergency managers. Contact information can be found at: https://www.oregon.gov/oem/Documents/locals_list.pdf.

Can CCOs use Non-Emergency Medical Transportation (NEMT) to evacuate members?

OHA has requested guidance from the Federal Centers for Medicare and Medicaid Services (CMS) about authority to utilize NEMT for evacuation. We have not received a response yet but will provide updates as they become available.

Will OHA be seeking a Disaster State Plan Amendment (SPA) or 1135 waiver from CMS for the fire emergency?

OHA received communication from CMS on September 11, 2020 that the current Disaster SPAs, 1135 waivers, and Appendix K waivers the state has in place for the COVID-19 pandemic also apply to the fire emergency. OHA will be evaluating if additional flexibility is required and will seek authority from CMS as necessary.

Can SNAP benefits be replaced due to a disaster?

Yes. SNAP benefits can be replaced for current recipients when there has been a non-presidentially declared disaster or household misfortune. Due to the Emergency Declaration, SNAP benefits may be replaced when the value of food purchased with SNAP benefits has been spoiled or destroyed (e.g., due to fire, flood or loss of electricity). Households in need should contact their local DHS or AAA branch office.

How do we support members undergoing a mental health crisis during the emergency?

CCOs are encouraged to connect with County Mental Health Programs (CMHPs) to partner in providing crisis services. CCO BH directors and CMHPs met with OHA BH Director Steve Allen on September 10, 2020. OHA plans to have continued conversations and provide resources to CCOs and CMHPs in how to address BH needs through the crisis. Please contact Anastasia Sofranac at anastasia.sofranac@dhs.oh.state.or.us with specific questions.

Additional behavioral health crisis services are available:

- [SAMHSA’s Disaster Distress Helpline](#) provides 24/7, 365-day-a-year crisis counseling and support to people experiencing emotional distress related to natural or human-caused disasters. Call SAMHSA’s Disaster Distress Helpline at 1-800-985-5990 or text TalkWithUs to 66746 to speak to a trained crisis counselor.
- Help is also available from Lines for Life, a suicide prevention organization with specific resources for youth, military personnel and their families, and those affected by substance abuse problems. Visit linesforlife.org or call one of their helplines:
 - Suicide Lifeline: 1-800-273-8255, 1-888-628-9454 for Spanish
 - Alcohol and Drug Helpline: 1-800-923-4357
 - Military Helpline: 1-888-457-4838
 - Youthline: 1-877-968-8491 or text teen2teen to 839863
- OHA also has [contacts for crisis services by county](#) on its website.

Can CCOs have an exemption by OHA of prior review and approval of member communications that relate to the fire emergency?

Quick communication and access to information is vital. That’s why if you are sharing or sending member materials related to the wildfire emergencies in your area, you do not need prior approval from OHA.

Please distribute without hesitation and submit to OHA for informational purposes using the tips below.

1. Ensure documents meet all regular communication standards, including:
 - a. Meeting language access standards
 - b. Having the language access tagline on member-facing documents
2. Use immediately
3. Submit documents for OHA record through regular SharePoint process
 - a. Mark “no review needed”
 - b. Include “Fire emergency” in comments

Additional Resources for the Emergency Response:

Wildfire Evacuation Protocol for People Quarantining or Isolating Due to COVID-19:
<https://sharedsystems.dhsoha.state.or.us/DHSForms/Served/le3257.pdf>

COVID-19 Interim Shelter Guidance:
<https://sharedsystems.dhsoha.state.or.us/DHSForms/Served/le2256A.pdf>

Oregon Health Plan Testing of COVID-19:

<https://www.oregon.gov/oha/HSD/OHP/Announcements/Oregon%20Health%20Plan%20coverage%20of%20COVID-19%20testing.pdf>

Oregon Wildfire Resources:

<https://wildfire.oregon.gov>