



500 Summer St NE E35

Salem, OR, 97301

Voice: 503-945-5772 or 800-527-5772

Fax: 503-373-7689

TTY: 711

www.oregon.gov/OHA/HSD

Date: April 7, 2023

To: Coordinated care organizations

From: Dave Inbody, CCO Operations director

Veronica Guerra, CCO Quality Assurance and Contract Oversight manager

Subject: 2020-2021 Compliance Monitoring Review Unresolved Findings

Beginning in CY 2020, OHA requested that HSAG conduct compliance reviews over a three-year cycle with one-third of the standards being reviewed each year. The division of standards over the three years is outlined in the table below.

Compliance Monitoring Standard	Year One (CY 2020)	Year Two (CY 2021)	Year Three (CY 2022)
Standard I—Availability of Services		✓	
Standard II—Assurances of Adequate Capacity and Services		✓	
Standard III—Coordination and Continuity of Care	✓		
Standard IV—Coverage and Authorization of Services	✓		
Standard V—Provider Selection		✓	
Standard VI—Subcontractual Relationships and Delegation		✓	
Standard VII—Member Rights and Protections	✓		
Standard VIII—Confidentiality			✓
Standard IX—Enrollment and Disenrollment			✓
Standard X—Grievance and Appeal Systems	✓		
Standard XI—Practice Guidelines		✓	
Standard XII—Quality Assessment and Performance Improvement			✓
Standard XIII—Health Information Systems			✓
Standard XIV—Member Information	✓		

CCOs are required to submit an Improvement Plan (IP) addressing all elements that were Partially Met or Not Met. The CCO must identify the actions(s) taken to achieve compliance with the requirement, the individual(s) responsible, and the timelines for completing the planned activities. Implementation of interventions identified in the IP should begin immediately to resolve findings and bring the organization into compliance with federal and State requirements. The completed IP and evidence of implementation must be submitted with the 2023 Compliance Monitoring Review pre-onsite documentation due to Health Services Advisory Group (HSAG) on April 20, 2023.

HSAG will review the CCO's IP, evidence of implementation for resolution of the 2022 findings, and any unresolved findings from previous review cycles. To date, CCOs have not fully resolved all findings identified in 2020 and 2021 review cycles (50% of total findings across CCOs remain unresolved).

OHA expects all previous years' findings to be resolved as expeditiously as possible including 2022 CMR findings. If findings are not resolved by April 20, 2023, OHA may determine a CCO is not in compliance with state and federal requirements and may, among other remedies, impose a Sanction, set forth in Exhibit B, Part 9, Sections 1-3 of the Contract and OAR 410-141-3530.

CCOs are encouraged to contact HSAG to schedule a technical assistance call to review findings and ensure proposed interventions will successfully resolve areas of noncompliance.

Questions?

If you have general questions about this communication, please contact Cheryl Henning, CCO Contracts Administrator, at Cheryl.L.Henning@oha.oregon.gov.

Thank you for your continued support of the Oregon Health Plan (OHP) and the services you provide to OHP members.