



Date: November 20, 2024

To: Coordinated care organizations (CCOs)

From: David Inbody, CCO Operations director

Subject: Annual Pharmacy Benefit Manager Subcontract compliance audit

This communication is notice of the Oregon Health Authority's (OHA) decision to waive the following requirement in the Contract Year (CY) [2025](#) CCO contract:

- Exhibit B, Part 2, Section 7, Paragraph e, Subparagraph (2), Sub-Subparagraph (d): This contract provision describes the requirement for the CCO to have a third-party perform an annual compliance audit of the CCO's Pharmacy Benefit Manager (PBM) Subcontract and for the CCO to submit a summary of the audit findings to OHA.

OHA hereby waives the requirement for the annual PBM Subcontract compliance audit due in CY 2025. This waiver does not relieve the CCO of any other requirements relating to PBM Subcontracts and oversight of such Subcontractors.

The first annual PBM Subcontract compliance audit will be due in CY 2026 and will cover CY 2025.

Please note that this waiver was announced in the [CCO Pharmacy Directors Workgroup](#) meeting on [October 3, 2024](#).

Questions?

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

If you have questions about PBM Subcontracts, please contact Deborah ("Dee") Weston, Pharmacy Program Policy Advisor, at Deborah.G.Weston@oha.oregon.gov.

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