



Date: May 3, 2021

To: Coordinated Care Organizations

From: Dave Inbody, CCO Operations Manager

Subject: System of Care policy resubmission and re-evaluation

This communication is to clarify the Oregon Health Authority's (OHA) expectations for CCOs' System of Care (SOC) policies for CY 2021 and to describe OHA's plan for resubmission and re-evaluation of these policies.

- Exhibit M, Section 19, Child and Youth Behavioral Health Services: Subparagraphs (3) and (4) of Paragraph p. in this section describe the requirement for the CCO to develop an SOC policy and to submit it to OHA by February 28, 2021, for review and approval. The SOC policy must have been approved by the CCO's SOC Executive Council prior submission to OHA.

OHA provided CCOs with the SOC policy evaluation criteria on January 29, 2021. OHA provided CCOs with their individual policy evaluation results on April 15-16, 2021. OHA instructed CCOs to submit their corrected policies by May 7, 2021.

OHA recently determined that the criteria used to evaluate the SOC policies exceed that which are permitted under the CY 2021 contract. The SOC policy is described in the contract as a policy rather than a policy *and procedure*. However, OHA's evaluation criteria include concepts reflective of a policy *and procedure*. Requiring the SOC policy to include procedures or process concepts is outside the scope of current contract requirements.

OHA will revise the CY 2021 SOC policy evaluation criteria and distribute the document to CCOs. Each CCO will have 90 days from the distribution date to revise and re-submit its SOC policy for OHA review and approval. CCOs may include procedures or process concepts in the revised policy, but OHA will not evaluate such content. CCOs should disregard the SOC policy evaluation results communicated last month by OHA; also, the May 7, 2021, resubmission deadline no longer applies.

In order to accelerate the revision and resubmission process, OHA hereby waives the requirement for the revised SOC policy to be approved by the CCO's SOC Executive Council prior to submission to OHA provided that the CCO has not made substantive changes to the policy concepts represented in the revised policy as compared to the version submitted to OHA earlier this year.

OHA will provide CCOs with their individual evaluation results for the revised SOC policy within 30 days of the resubmission due date.

Questions?

If you have questions about this communication, please contact Cheryl Henning, CCO Contracts Administrator, at Cheryl.L.Henning@dhsoha.state.or.us.

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