



**Date:** November 1, 2023  
**To:** Coordinated care organizations (CCOs)  
**From:** Dave Inbody, CCO Operations director  
**Subject:** Attestation for qualifications of staff making SUD PA decisions

This communication is in follow up to the [9/7/2023](#) memo about the Annual Behavioral Health Report (ABHR) in the [2023](#) CCO contract. In that memo, the Oregon Health Authority (OHA) waived submission of the 2023 ABHR as a standalone deliverable and noted that key metrics from that report would be incorporated into the separate 2023 Comprehensive Behavioral Health Plan update and progress report. OHA also noted that these same changes would be reflected in the 2024 contract.

In making the above decision, OHA overlooked the provision, which was new to the 2023 contract, that the ABHR would be used for CCOs to report on the qualifications of staff, including those of Subcontractors, making Prior Authorization (PA) decisions for Substance Use Disorder (SUD) treatment (Exh. M, Sec. 23, Para. c). OHA is required to monitor the qualifications of these staff for the OHP SUD 1115 Demonstration waiver.

OHA cannot waive this provision in its entirety. However, OHA has determined that an Attestation of compliance from each CCO, instead of a report on staff qualifications, is sufficient to meet the monitoring requirement. Later this month, OHA will provide CCOs with an Attestation that, upon submission, will serve as the 2023 deliverable for this requirement. CCOs will have 90 days from that date to submit the Attestation via the CCO Contract Deliverables [portal](#).

OHA has taken this same approach for the 2024 contract, with the addition of the following language to Exh. M, Sec. 7, "Substance Use Disorders," as new Para. j:

Contractor shall:

- j. Require all staff (including staff of any Subcontractor(s)) making Prior Authorization (PA) determinations for SUD treatment services and supports have a working knowledge of the ASAM Criteria, as required by the OHP SUD 1115 Demonstration waiver. Contractor shall submit to OHA, via Administrative Notice, by July 31 of each Contract Year an Attestation of its compliance with this requirement. Contractor shall also provide to OHA, via Administrative Notice, the information that is the basis of its Attestation within five (5) Business Days of request by OHA. Such information may include but is not limited to staff training, experience, continuing education, and credentials specific to the ASAM Criteria. Consistent with Ex. B, Part 9, OHA has the right to impose one or more Sanction(s) if it determines that Contractor's Attestation is false.

## Questions?

If you have general questions about this communication, please contact Cheryl Henning, CCO Contracts Administrator, at [Cheryl.L.Henning@oha.oregon.gov](mailto:Cheryl.L.Henning@oha.oregon.gov).

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