

Date: July 24, 2025

To: Coordinated care organizations (CCOs)

From: David Inbody, CCO Operations Director

Subject: Update #2 regarding Planned Parenthood claims

This memo is an update to the memos issued on [July 9, 2025](#), and [July 11, 2025](#), about Planned Parenthood claims. These memos were issued in response to Section 71113 of Public Law [119-21](#), also known as the One Big Beautiful Bill Act or OBBBA, that prohibits states from using federal Medicaid funds to pay a “prohibited entity.”

The Oregon Health Authority (OHA) determined that the Oregon Medicaid enrolled providers that may meet the definition of a “prohibited entity” are Planned Parenthood of the Columbia-Willamette (PPCW) and Planned Parenthood of Southwestern Oregon (PPSO). There is significant ambiguity in the OBBBA regarding when the defunding of prohibited entities is to be applied. On the one hand, the bill states the defund provision goes into effect immediately, but on the other hand, a determination is supposed be made on October 1, 2025, about which entities are prohibited entities. OHA is being cautious in its guidance about payment of claims for PPCW and PPSO. However, because OHA is asking that certain claims be held and not denied based on the date of service, depending on the outcome of the litigation described below, OHA may instruct CCOs to pay the held claims at a later date.

In the July 9th memo, OHA directed CCOs to hold Planned Parenthood claims with dates of service on or after July 4, 2025. OHA advised CCOs that this directive only applies to Planned Parenthood claims for services provided to CCO members covered by the 2025 CCO [Medicaid](#) Contract. It does not apply to claims for services provided to members covered by the separate Non-Medicaid and Oregon Health Plan Bridge – Basic Health Program (“OHP Bridge-BHP”) Contracts.

In the July 11th memo, OHA advised CCOs to resume processing Planned Parenthood claims as usual for dates of service on or after July 8, 2025. OHA also advised CCOs to continue to hold claims for dates of service July 4, 2025, through July 7, 2025 (“the Held Claims”). This direction was a result of the temporary restraining order (TRO) issued by a U.S. District Court judge on July 7, 2025, and an amended TRO that prevented enforcement of the OBBBA through July 21, 2025.

On July 21, 2025, the U.S. District Court judge issued a partial ruling on the motion for a preliminary injunction (PI), partially granting Planned Parenthood's request for a PI but also deferring a ruling on the remainder of Planned Parenthood's motion. The ruling is confusing and unclear, but it appears that the PI issued on July 21st **does not** apply to PPCW and PPSO. Another ruling on the remainder of the motion is expected but the court provided no timeline for the further ruling. Therefore, until further notice OHA is directing CCOs to hold Planned Parenthood claims with dates of service on or after July 22, 2025. As stated in the July 9th memo, in the event a CCO pays such a claim and submits the associated encounter data to OHA, OHA will direct the CCO to void the encounter data.

Additionally, OHA has determined that the portion of Healthier Oregon Program (HOP) members' benefits covered by the Medicaid Contract are not subject to the OBBBA funding ban. This is because the services that Planned Parenthood provides to these CCO members are not paid with Medicaid funds. They are paid with Children's Health Insurance Program (CHIP) funds; CHIP funds are not affected by the OBBBA. As a result, CCOs may process the Held Claims for HOP members covered by the Medicaid Contract. As previously stated, Planned Parenthood claims for services provided to HOP members covered by the Non-Medicaid Contract are not affected by the OBBBA as they are paid with state funds.

What should you do?

- Pay Planned Parenthood claims with dates of service July 8, 2025, through July 21, 2025, for all CCO members covered by the Medicaid Contract.
- Hold Planned Parenthood claims with dates of service on or after July 22, 2025, for CCO members covered by the Medicaid Contract, except for HOP members as noted below.
- Pay Planned Parenthood claims for HOP members covered by the Medicaid Contract for dates of service July 4, 2025, through July 7, 2025. Pay Planned Parenthood claims for HOP members as usual for dates of service from July 8, 2025, forward.
- Pay Planned Parenthood claims for CCO members covered by the Non-Medicaid and OHP Bridge-BHP Contracts as usual, regardless of the date of service.

OHA will continue to share information as it becomes available.

Questions?

Please send any questions about this communication to
Medicaid.Programs@odhsoha.oregon.gov.

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