

CCO 2.0 Health Equity Infrastructure Frequently Asked Questions



CCOs are called to advance and sustain the necessary changes within their organizational governance and leadership to effectively promote health equity through policy, practices, and the allocation of dedicated resources. One of those practices is the development of an organization-wide oversight structure to lead, develop, support, and monitor all activities that relate to health equity.

This FAQ provides answers to common questions regarding CCO 2.0 Health Equity Infrastructure. Details on each component can be found on the component guidance document. All guidance documents related to "Health Equity Infrastructure" deliverable for CCO 2.0 (i.e., Health Equity Plan, Health Equity Administrator) will be posted on the OHA CCO Contract Forms website: www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx

In addition, "CCO Technical Assistance" section will be added to the **OHA Equity and Inclusion Division** website <https://www.oregon.gov/oha/oei/Pages/index.aspx> by April 1st, 2020 with information about additional planned resources and a technical assistance timeline.

What does Health Equity Infrastructure mean?

The term "*health equity infrastructure*" refers to the meaningful adoption and use of culturally and linguistically responsive models, policies, and practices. These include but are not limited to the: implementation of the Health Equity Plan and Health Equity Administrator; community and member engagement; provision of quality language access; ensuring workforce diversity; ADA compliance and accessibility of Coordinated Care Organizations (CCOs) and provider network; ACA 1557 compliance; training of CCO staff and provider network; and implementation of the CLAS Standards and non-discrimination policies.

What are the new CCO 2.0 deliverables for health equity?

In the new contract, CCOs are required to have a Health Equity Administrator and develop an annual Health Equity Plan.

What is the Health Equity Administrator?

The Health Equity Administrator or HEA is a single point of accountability (SPA) that will lead the design and development of health improvement strategies to eliminate health disparities and improve the health and well-being of all members. In the contract, the single point of accountability appears as the "Health Equity Administrator." (CCO Contract Exhibit K Part 10 (a)(2)).

Are CCOs required to hire a Health Equity Administrator (HEA)?

No, CCOs are not required to hire new staff to fill this position. CCOs can designate a current employee with decision making authority to the role. However, the "Health Equity Administrator" is a contractual requirement, and designation is not optional.

What are the requirements for the Health Equity Administrator (HEA)?

The Health Equity Administrator will be responsible and accountable for all matters relating to Health Equity within the CCO, CCO Provider Network, and CCO service area.

OHA expects that the HEA is a high-level employee (e.g., director level or above) with authority to communicate directly with CCO executives and governing board. Additionally, OHA expects that the development of the "Health Equity Administrator" reporting structure and overall role shows clear evidence that health equity activities and health equity are integrated into all functions of the organization. The Administrator can have more than one area of responsibility and job title.

Does the CCO need to inform OHA who the Health Equity Administrator is?

Yes. CCOs are expected to include in the 2020 submission of the Health Equity Plan (Section 1) details about the HEA including but not limited to: name and contact information, HEA areas of responsibility, and a description of the HEA role as it fits into the CCO governance structure for accountability of advancing health equity at the CCO and community.

CCO 2.0 Health Equity Infrastructure

Frequently Asked Questions



What is a Health Equity Plan?

A Health Equity Plan is a tool that a Coordinated Care Organization (CCO) and its stakeholders can use to develop a clear framework to advance health equity in their organization, provider network, and service area. The Health Equity Plan is not meant to function in isolation from other areas of the organization. CCOs are not expected to develop a separate set of projects to fulfill the requirements of the health equity plan. OHA expects the plan to complement other organization-wide efforts such as CCO strategic planning, CHA/CHPs, CCO work on Social Determinants of Health, and other initiatives. The Health Equity Plan will provide evidence to OHA that health equity is integrated into all functions of the CCO as an organization.

What is included in the Health Equity Plan?

- Section 1- Narrative of Health Equity Plan development and implementation;
- Section 2- Health Equity Plan Strategies, goals, objectives, and metrics;
- Section 3- Organizational and Provider Network Cultural Responsiveness, Implicit Bias Training, and Education Plan.
- Section 4 – Health Equity Assessment, also known as “Progress Report”

**See questions below on due dates of sections.

Are all CCOs required to submit a Health Equity Plan?

Yes, all CCOs are required to submit a Health Equity Plan.

When do CCOs need to submit the Health Equity Plan?

The Health Equity Plan is a CCO annual contract deliverable and must be submitted to OHA via Administrative Notice by June 30th of each contract year, beginning in 2020.

In 2020, what sections of the Health Equity Plan are due on June 30th?

Sections 1,2,3 are due on June 30, 2020.

Section 4 – Health Equity Assessment does not need to be submitted on June 30, 2020.

When will all four sections be due?

Beginning in 2021, all four sections of the Health Equity Plan are due each year on June 30th.

Does the Health Equity Plan have a guidance document?

Yes, the Health Equity Plan has a guidance document that was released on March 11th, 2020. The guidance document is posted on the OHA CCO Contract Forms website: www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx

Does the Health Equity Plan have a template?

No, the Health Equity Plan does not have a template. However, the plan has sections, and CCOs must complete each section as described in the Health Equity Plan Guidance Document. To allow for flexibility for the CCO and community, the Health Equity Plan is a narrative and policy submission deliverable. CCO Health Equity Plans need to follow the page limit guidance. Page limits only apply to the narrative and do not apply to policy and procedure submissions.

Is the Cultural Competency and Implicit Bias Training Plan part of the Health Equity Plan?

Yes, the Cultural Competency and Implicit Bias training plan is a focus area (focus area #6), and it is part of the Health Equity Plan and it not a separate deliverable. This focus area is due with the rest of the submission for the Health Equity Plan due on June 30th, 2020.

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Must every focus area be addressed in the Health Equity Plan?

Yes, the Health Equity Plan has eight (8) focus areas, and all must be addressed. Focus areas are used in the Health Equity plan to provide a framework of the areas a CCO needs to address to comply with state, federal, and contractual requirements; reduce health disparities; provide meaningful access to health care and services; and improve the health outcomes of its members.

When is reporting on the Health Equity Plan due?

The Health Equity Plan has four sections. Section four (4) is the section where CCOs are asked to report on the plan progress. Reporting on plan progress is not due until 2021.

When will CCOs receive feedback on their 2020 Health Equity Plan submission?

Individual CCO feedback calls will be held in August 2020 with the CCO Health Equity Administrator to review findings (if any deficiencies are found), a general analysis of the plan's strengths and opportunities, and identify offerings of technical assistance.

What technical assistance is available from OHA in advance of the June 2020 Health Equity Plan submission?

To support CCOs in completing their Health Equity Plan, OHA is offering additional CCO Health Equity Plan Resources.

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In addition, "CCO Technical Assistance" section will be added to the OHA Equity and Inclusion Division website <https://www.oregon.gov/oha/oei/Pages/index.aspx> by April 1st, 2020 with information about additional planned resources noted below and a timeline.

Individual meetings with CCOs – After the March release of the guidance, OHA will schedule individual meetings with CCO Health Equity Administrators to discuss the health equity plan guidance and provide an opportunity to ask questions or gain further clarification. More details on Health Equity Plan Guidance Document.

Webinars – OHA will conduct two webinars after release of the health equity guidance to review the various components of the health equity plan and offer all CCOs an opportunity to ask questions or obtain further clarification. More details on Health Equity Plan Guidance Document.

Office hours – OHA will host office hours that will be available and open to all CCOs. This will be another opportunity to ask questions or obtain further clarification. More details on Health Equity Plan Guidance Document.

Additionally, the templates and guidance document will be cross-posted on the OHA CCO Contract Forms website: www.oregon.gov/oha/HSD/OHP/Pages/CCO-Contract-Forms.aspx.

Who can I contact at OHA for assistance?

Questions about the Health Equity Plan Guidance Document can be directed to:

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