

Part 1: High-Level Description of Possible Significant Change

The table below provides high-level information about the possible significant change, as submitted.

Tracking #	2027-014
Q6. Provide a short name for possible change	CCO Subcontractor Dispute / Term Language
Q1. Which CCO Contract(s) will be impacted?	(a) All 3 contracts
Q2. High-level description of possible change	CCOs will ensure their subcontracts include language that prevents contract disputes from interfering with day-to-day operations and CCO contractual obligations. CCOs will ensure their subcontracts include language to ensure that Subcontractors and Downstream Entities provide and/or maintain access to records beyond contract termination.
Q3. Which prioritized restatement category applies?	(e) Other (this change does not fit into any of the prioritized categories)
Explain how change fits into "Other" category	Prevent disruption in service to members and/or CCO's ability to provide data/reports to state/federal agency.
Q4. Could entire change be deferred to later contract year?	No
Consequence(s) if not included in 2027 contract	Need to ensure that service disruption to members and/or CCO's ability to provide data/reports to state/federal agency does not occur when a CCO's subcontractor and/or downstream entity terms or disputes contract terms.
Q5. Could change be reduced to smaller components so it's phased in over multiple contract years?	No
Which component(s) could be in later contract year(s)?	
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Executive Sponsor OHA Division/Program/Unit	Medicaid/CCO Operations/CCO Quality Assurance

Part 2: Information for Engagement

This should be completed by the responsible OHA unit. **Be specific yet clear and concise in your responses; use bullet points.**

Tracking #	2027-014
Short name	CCO Subcontractor Dispute / Term Language

1. What is the specific issue that will be addressed by this change?

This should explain the current state and why it's an issue to be addressed.

Need to ensure that service disruption to members and/or CCO's ability to provide data/reports to state/federal agency does not occur when a CCO's subcontractor and/or downstream entity disputes contract terms and/or terms the contract. If not currently included in CCO subcontract(s), there is a risk that members may not receive timely services/communications and/or CCO's may not be able to provide specific information to state/federal agencies upon request.

2. What is the preliminary suggestion for how to address the issue?

This should align with the high-level description submitted for the change. Refer to Part 1: High-Level Description of Possible Significant Change. The final proposed change may differ from the preliminary suggestion as a result of OHA and CCO engagement.

CCOs to ensure their subcontracts include language to prevent disruption to provide services to members and/or CCO ability to provide data/reports to state/federal agencies during contract disputes and/or after contract terms for a period of ten years. Data held by subcontractors/downstream entities should remain available to CCO during this timeframe.

3. What knowledge and/or skills should CCOs consider when deciding which staff to work with OHA on this issue?

Contracts and compliance knowledge and familiarity with CCO subcontracts and delegation oversight operations.

4. Is there an existing meeting where OHA and CCOs can work – or are already working – on this issue? If so, identify the meeting and its schedule.

This work may require regular OHA-CCO engagement over a few weeks, possibly up to a couple months. If there is not a suitable existing forum, then OHA will hold a dedicated work session/s specifically for this purpose.

No. We will set up separate workgroup to address Subcontractor specific contract changes.