

Part 1: High-Level Description of Possible Significant Change

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

Tracking #	2027-912
Q3. Provide a short name for possible change	Align Transitions of Care data sharing requirements with CMS Interoperability requirements
Responsible OHA unit/s & SME/s	In process
From 1/27/2026 OHA memo to CCOs	Partially addressable Transition of care requirements exist primarily in OARs. The possibility of aligning transition data sharing requirements with federal interoperability requirements may be appropriate to include in discussions about data exchange requirements. OARs will be updated based on the results of this work.
Q6. Which CCO Contract(s) will be impacted?	(a) All 3 contracts
Q4. High-level description of possible change	Align Transitions of Care data transfer requirements with CMS Interoperability requirements and permit CCOs to provide these services using either method (and not require both). OHA's Transitions of Care process requires sharing claims, prior auths and care plans when a member with higher health risks transfers from FFS to a CCO or from a CCO to another CCO. This has historically been done by sharing text files on SharePoint using a proprietary format that is not used in any other workflow. CMS Interoperability requirements for health plans CMS-9115-F) includes the ability to share claims, and in 2027, will include sharing prior auth data (CMS-0057-F). The method required for this data exchange are API's based on a set of national standards (FHIR). Moving to these standards would reduce redundant work to maintain multiple solutions for sharing the same type of data.
Q2. Which prioritized restatement category applies?	(b) CCO Table Considerations
Explain how change fits into "CCO Table Considerations" category	Aligns the technical specifications of one CCO deliverable with the technical specifications required in another CCO deliverable.
Q7. Could entire change be deferred to later contract year?	Yes
Consequence(s) if not included in 2027 contract	
Q8. Could change be reduced to smaller components so it's phased in over multiple contract years?	Yes
Which component(s) could be in later contract year(s)?	There are several components to this, and they could be taken up in later years. With that said, we would not be bringing this forward if we didn't believe it to be sound policy for CY2027.
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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.**

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Short name	Align Transitions of Care data sharing requirements with CMS Interoperability requirements

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

Knowledge about and experience with meeting existing CCO-to-CCO data sharing requirements in OAR [410-141-3850](#) - Transition of Care. Knowledge about and experience with federal interoperability standards and APIs for plan-to-plan data sharing for claims/encounter data, clinical records, and authorization data.

2. 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