

CMS 2390-F Managed Care Final Rule Implementation Status

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About the CMS 2390-F Managed Care Final Rule Implementation Project

The project comprises 11 phases, according to the [implementation dates outlined by the Centers for Medicare & Medicaid Services \(CMS\)](#). The Oregon Health Authority (OHA) is currently working on Phase III-B, to identify and operationalize changes required January 1, 2018:

- Phase III-A identified the requirements to complete effective January 1, 2018, including all required Oregon Administrative Rule (OAR) and coordinated care organization (CCO) contract changes.
- Phase III-B ensures implementation of those requirements no later than January 1, 2018.

This fact sheet provides OHA's current project status.

Project status as of November 2017:

Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec
●	●	●	●	●	●	●	●	●	●	●	●

Legend:

- **Green:** In process, on track
- **Yellow:** Some concerns, minimal risk
- **Red:** Off track, high-risk
- **Blue:** Complete

For November, the project status is yellow because of delays in the review and assessment of Final Rule requirements related to quality control and compliance monitoring.

As of this update, OHA has filed Notices of Proposed Rulemaking for Division 141 rules with the Secretary of State. OHA Rules Advisory Committee (RAC) members have received copies of the proposed rules. The rules are now available for public comment on the [OHP Proposed Rulemaking Notices and Hearings page](#). The rulemaking hearing is set for December 15, 2017. Public comment ends

December 19, 2017. Any questions or comments regarding the proposed rules should be sent to hsd.rules@dhsoha.state.or.us.

Committee members and subject matter experts continue to review and update work plans, as appropriate, to reflect the tasks and operations necessary to implement January 1, 2018 rule and contract changes.

In January, Ralph Magrish will take on the roles of Division 141 policy analyst and CMS 2390-F project lead. As the new lead for this project, Ralph will attend monthly Contract and Compliance meetings to update the CCO contractors on the status of the project. During this transition, Kellie will remain the contact for questions.

Background

On May 5, 2016, CMS published the federal [Medicaid and CHIP Managed Care Final Rule](#) (CMS 2390-F). This rule requires state Medicaid agencies to make many changes related to its oversight of contracted managed care organizations, including:

- Operation,
- Contracting,
- Rates,
- Oversight, and
- Payment.

To meet these requirements, OHA has developed a project plan to implement the changes required by the Managed Care Final Rule.

The project plan will ensure that OHA updates the Oregon's Medicaid and CHIP State Plans; Section 1115 demonstration waiver; and all contracts, rates, payment, communications, operations, and rules affected by requirements outlined in the Managed Care Final Rule.

The project provides opportunity to collaborate, consult and communicate with divisions and units throughout OHA and the Department of Human Services; CCOs; and internal and external partners throughout Oregon.