



May 16, 2019

The Honorable Governor Kate Brown  
254 State Capitol  
Salem, OR 97301

RE: Oregon Health Authority Monthly Update on Ongoing and Emerging Issues

Dear Governor Brown:

This letter is the Oregon Health Authority's (OHA) May 16<sup>th</sup> monthly issue update. We have two previously documented issues to communicate updates.

OHA's Issue Resolution Leadership Team and the Issue Resolution Project Team have been meeting jointly to provide leadership oversight and to ensure progress continues to be made in resolving identified issues. We are also continuing ongoing research and analysis into previously documented issues as well as documenting new issues.

***Updates to Previously Documented Issues***

**Issue Number 002-17: Dual Eligible Population**

**Status:** Continue Monitoring

**Estimated Additional Impact:** TBD

**Summary and Update:** As reported in the April 15, 2019 update, OHA is continuing to monitor any disputed claims related to the dual eligible population (eligible for both Medicaid and Medicare). Staff are currently researching a potential concern where the Medicaid Management Information System was not paying correct amounts for claims. More information will be provided as staff continue to research.

***Previously Documented Issues – Resolution***

**Issue Number 022-17: Non-Covered Services in Rates for Certain Certified Community Behavioral Health Clinics (CCBHC)**

**Status:** Resolved

**Estimated Impact:** \$130,023 (including both Fee-for-Service and Wrap payments)

**Summary:** Some non-covered crisis respite services may be included in cost data reported to OHA for use in developing rates paid to Certain Certified Community Behavioral Health Clinics (CCBHCs). OHA is gathering information from CCBHCs to determine the scope and impact of the issue and will determine next steps to adjust rates, as needed.

**Update:** After research was completed it was determined that there were two services that some CCBHCs included in their cost report upon which the Prospective Payment System (PPS) rates were determined therefore resulting in incorrect rates. The CCBHCs that were affected were informed in the fall of 2017. Corrected cost reports were submitted by the CCBHCs and the funds were recouped in the fall of 2018. Rate adjustments were completed by the end of November 2018 and staff have been working to assure that there is no further risk of this issue reoccurring since that time.

Please don't hesitate to contact me with any questions you may have.

Sincerely,

A handwritten signature in blue ink, appearing to be 'P. Allen', with a long horizontal flourish extending to the right.

Patrick M. Allen  
Director

ENC: Issues Log and Status Report

EC: Fariborz Pakseresht, Director, DHS

**ISSUES LOG AND STATUS REPORT**



**Resolution Process Lifecycle**

<b>1. Issue Identified</b>	<b>2. Initial Issue Meeting</b>	<b>3. Research Underway</b>	<b>4. Issue Substantiated</b>	<b>5. Resolution Plan Established</b>	<b>6. Issue resolved</b>
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**Issues and Status**

NUMBER	ISSUE	IMPACT	STATUS
002-17	Dual Eligible Population	\$41.48 Million	Continuing to Monitor
003-17	Payments to Institutions for Mental Disease (IMDs)	\$9.7 Million	Resolution Plan Established
004-17	Payments for Certain Procedures Related to Termination of Pregnancy	\$2.0 Million	Resolution Plan Established
005-17	Bariatric Surgery Payments	\$1.5 Million	Resolution Plan Established
007-17	Overwritten Eligibility Records	1200 Individuals/\$46,000	Resolution Plan Established
008-17	Pharmacy Other Coverage Codes (payer of last resort)	\$1.2 Million (Est.)	Resolution Plan Established
009-17	Retroactive Terminations	\$17.3 Million (Est.)	Resolution Plan Established
010-17	Prescription Drug Rebate Credits	\$22.3 Million (Est.)	Resolution Plan Established
011-17	Posting of Cash Payments – Cash Medical	\$20 Million (Est. opportunity)	Resolution Plan Established
012-17	Fee-for-Service Payments while Enrolled in CCOs	TBD	Resolution Plan Established
013-17	Post-Delivery Coverage for CAWEM Plus Clients	TBD	Issue Substantiated
014-17	Capitation Payments for Deceased and Incarcerated Clients	TBD	Issue Substantiated
015-17	Long-Term Residential Services Eligibility	TBD	Resolution Plan Established
016-17	Case Mismatch Across Systems	TBD	Resolution Plan Established
017-17	Services Provided to Tribal Members at Non-Tribal Facilities	TBD	Resolution Plan Established
019-17	Tribal Targeted Case Management Services	TBD	Issue Substantiated
020-17	Prior Period Adjustments for Public and Private Providers	TBD	Issue Substantiated
022-17	Non-Covered Services in Rates for Certain Certified Community BH Clinics	\$130K	Resolved
001-18	Mental Health Residential Transition	Est. \$4.6 Million	Resolution Plan Established
003-18	Retroactive Medicare Eligibility	TBD	Resolution Plan Established
004-18	Medicaid Compliance – Language and Translation	TBD	Issue Substantiated
005-18	Disproportionate Share Hospitals (DSH) Audit Reporting	None	Continuing to Monitor
006-18	Contract Issues and Impact on Medicaid	TBD	Issue Substantiated
007-18	Insufficient Notices of Action Regarding Mental Health Residential Services	TBD	Resolution Plan Established
008-18	Tribal Pharmacy All-Inclusive Rate Settlement Overpayment	TBD	Research Underway
009-18	End Stage Renal Disease (ESRD) Provider Overpayments	Est. \$3.7 Million	Research Underway