
CCO Contracts & Compliance Meeting

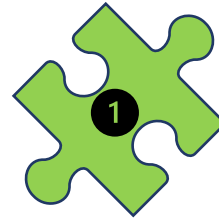
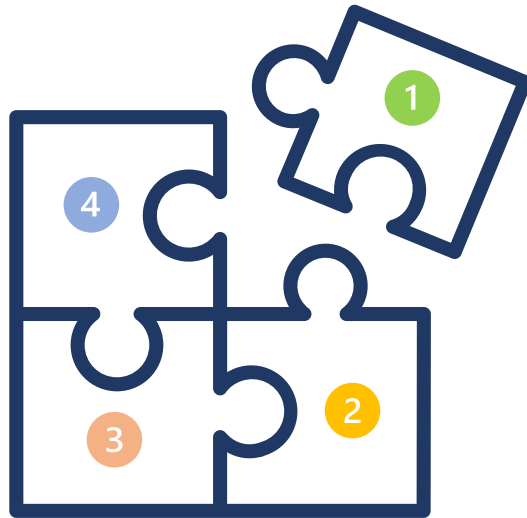
June 27, 2023

Network Adequacy Changes

Time and Distance Standards: Network Monitoring

Presenters: Carrie Williamson and Andrea Smith

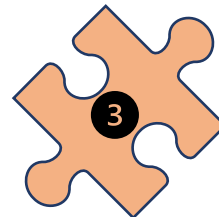
Time and Distance Standards



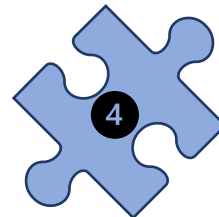
Provider Categorization



Geographic Regions



Time and Distance Tiers



Monitoring

Today's topics

- **Work Session Opportunities**

- OHA will bring a “puzzle piece” to Contracts & Compliance each month for a deeper dive discussion.
- Materials will be released ahead of the meeting for CCOs to review and foster deeper discussion during C&C.
- OHA requests that CCOs review the materials carefully in advance of the Contracts & Compliance meeting and come prepared for discussion.

- **Monitoring**

- Delivery System Network (DSN) Provider Capacity Reporting
- OHA Network Monitoring
- Exceptions Process – Time and Distance

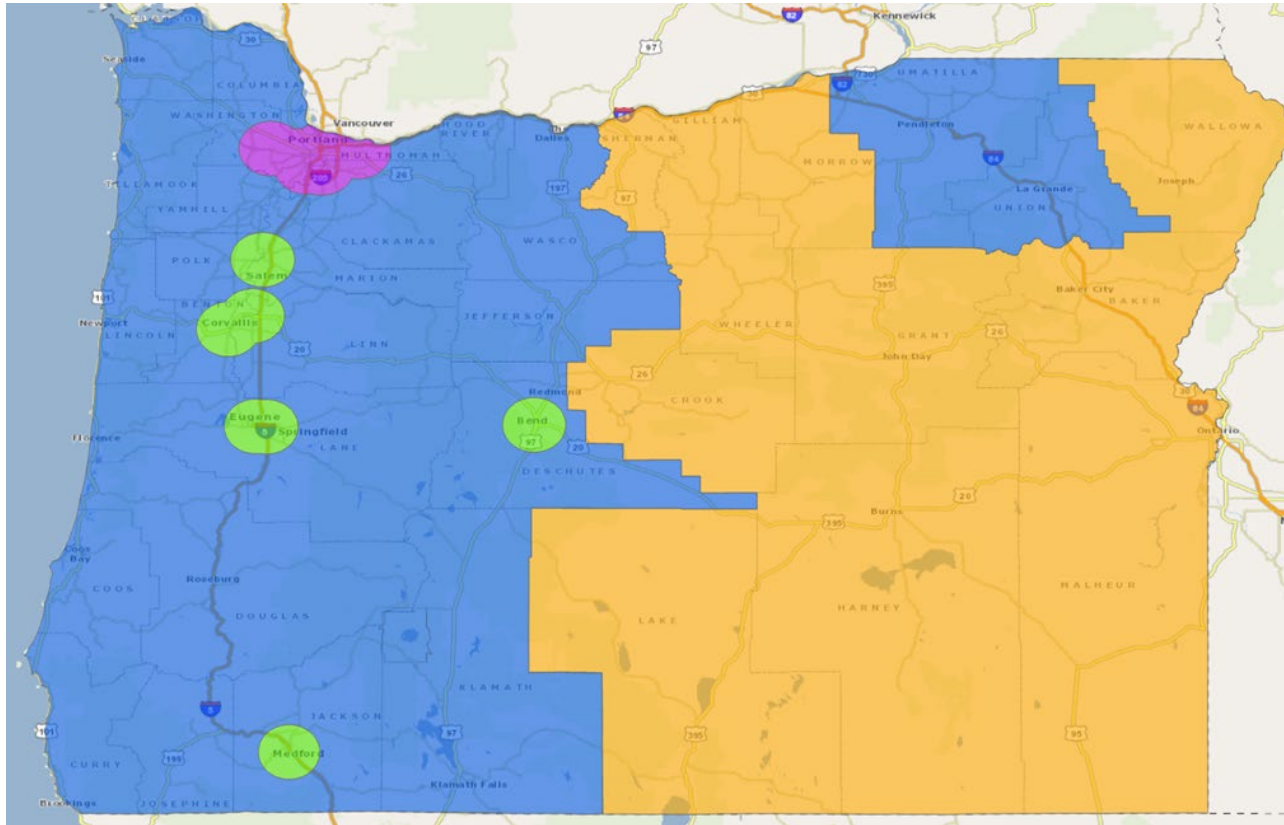
Delivery System Network (DSN) Provider Capacity Reporting

- The quarterly provider capacity reporting is integral to OHA's monitoring of CCO networks.
 - Currently, HSAG conducts an analysis of compliance with time and distance standards on an annual basis as part of its annual Network activities.
- Q1 2023 represents the first quarter using the updated reporting template and instructions.
- In reviewing the Q1 submissions, OHA is focusing on the quality of the data and the reporting:
 - Error logs focused on missing data elements and use of valid (correct) formats.
 - OHA to conduct a review of Group NPI and the relationship between the Individual and Facility sections of the reporting.

Delivery System Network (DSN) Provider Capacity Reporting

- Additional resubmissions as described in Exhibit G (1)(f) may be necessary. OHA will communicate resubmission requirements, as necessary, to individual CCOs via administrative notice.
- Failure to correct data quality issues may result in an improvement plan.
- OHA to request meetings with CCO staff as needed to discuss data quality issues observed in the reporting and offer technical assistance prior to any further resubmissions.
- At this time, OHA is not requiring resubmissions based on the Credentialing Date (dates outside of the 3-year window) or Individual NPI (blank) fields.

OHA Network Monitoring



Beginning with the Q1 2024 Provider Capacity Report submissions, OHA will monitor compliance with the time and distance standards set in OAR 410-141-3515 on a quarterly basis.

The analysis will evaluate compliance at the service-area level as well as at the geographic designation level.

OHA Network Monitoring

This will be incorporated into OHA's current network monitoring strategy, which includes:

- Provider counts;
- Provider count changes;
- “Active Provider” analysis (representation of individual providers in the claims & encounter data within 21 months prior to the end of the reporting period);
- Member-to-Provider ratio calculations by total and “active” provider counts;
- Evaluation of capacity (i.e. PCPs reporting as having capacity to serve additional members and individual providers accepting new members);
- Evaluation of non-English languages spoken by providers; and
- Additional measures as determined by OHA.

Exception Process – Time and Distance

In instances where the contracted supply of a particular provider type is such that a CCO is unable to meet the time and distance standards set in OAR 410-141-3515, OHA will consider approving an exception.

CCOs will be required to submit evidence of:

- A plan to remedy the network gap in order to come into compliance with the time and distance requirement; and
- A process for members requiring care from that provider type to access that provider type, including but not limited to: clinically-appropriate use of telehealth in accordance with OAR, out-of-network agreements, support to access NEMT & any reimbursements necessary to reach providers outside the service area; and
- Monitoring of member needs & utilization in relation to that provider type.

OHA to develop additional subregulatory guidance and a form for CCOs to use when preparing their exception requests for review.



Q & A