

Oregon Health Authority

One Percent Withhold

Under the Oregon Health Authority's final agreement with the Centers for Medicare and Medicaid Services (CMS) as required by the Special Terms and Conditions (STCs) of Oregon's Section 1115 demonstration, OHA has established a one percent withhold to ensure timely and accurate encounter data submission. This withhold is consistent with the contract signed in 2012 and amended in January 2013.

One Percent Background

Per the CMS waiver agreement, OHA will implement a process to withhold one percent of capitation from CCOs with greater than five percent of encounter data not yet submitted or corrected according to the contractual requirements for the subject month. This will allow 180 days for CCOs to submit encounter data for dates of service in the subject month and will allow 63 days, as per the contract, to make corrections to pended claims to achieve the 95% standard.

During the submission and correction time period, there is a maximum of 243 days from the last day of the subject month to complete the submission and correction of all available encounter data. OHA will provide support and technical assistance to CCOs in an effort to meet our mutual goal of high quality data.

OHA's goals were to design a one percent withhold methodology that:

- Is objective, straight forward, and transparent.
- Does not set an unreasonable requirement.
- Will encourage CCOs to invest in improving their claims processing and data submissions.

A schedule estimating one percent of each CCOs' January 2013 capitation rate is attached.

Administrative Performance Assessment

The goal of the administrative performance assessment is to improve the quality of encounter data submitted by CCOs into the state MMIS system. OHA expects CCOs to have the encounter data they have submitted for the subject month clean and finalized, as per contractual requirements, within 180 days of the subject month (Exhibit B, Part 8, Section 7.c.2).

Encounter claims submitted by a CCO for the subject month that have received a critical Pend error and require CCO action to finalize must be corrected to be considered clean and finalized. If a CCO is



unable to correct all pending encounters for the subject month due to an unanticipated or justified delay, that detailed information with an effective plan for resolution, must be reported by the CCO to OHA and agreed to in writing by OHA prior to the end of the Final Submission Month (Exhibit B, Part 8, Section 7.d.3.f).

OHA is using two factors to characterize data quality:

- Number of encounters that require CCO action (Pended) for the subject month.
- Total number of encounters submitted for the subject month.

Exceptions

As there are occasional barriers to claims submission and correction, a defined list of exceptions to the submission requirement and a process for notification to OHA is available in the contract. OHA system issues which impeded a CCO's ability to submit or fix submitted claims will be excluded from the withhold process.

One Percent Withhold Process

Beginning with the first subject month of January 2013, OHA will track a CCO's encounter data submitted that is finalized and clean after **180 days past** the last day of the month in which the service was provided. If a CCO's data submissions for the subject month are clean and finalized, no withhold will be proposed.

If, 180 days past the end of the subject month, more than 5% of encounter claims for that month have not been submitted or have remained pended for more than 63 days from notification and those claims do not fall under any of the contractual exceptions and have not been specifically exempted by OHA, OHA will notify the CCO of the delinquency and the intent to withhold one percent of the subject month's capitation amount from the upcoming month's payment.

As per Exhibit B, Part 8 of the contract, OHA has 30 calendar days after the 180 day period ends to notify CCOs of their status for the subject month by sending the Proposed Subject Month report or the Final Subject Month report.

As outlined in Exhibit B, Part 8, Section 7.d, a CCO can appeal this notice. To appeal, a CCO must provide a written notice of appeal for the subject month it is appealing no later than 15 calendar days after the date of the Proposed Subject Month report and provide written support for the appeal. OHA will conduct any appeals as administrative reviews. At the end of the review process, OHA will make a final decision on implementation of the one percent withhold.



Timing of Encounter Data Submission and Withhold Calculation, 2013



One Percent Reporting

OHA will provide two ongoing reports to support CCO data submission: a monthly report card and either a Proposed or Final Subject Month Report.

Monthly Report Card

OHA will provide a monthly report card to each CCO that includes the following:

- Number of clean encounters submitted for the subject month.
- Number of encounters awaiting CCO action to finalize (Pended).

CCOs will be able to continually monitor the quality of their data submissions. Monthly report cards will be cumulative, up to 6 months. The report card will facilitate transparency and allow CCOs to know in advance of any encounter data submission issues.

Final Report

OHA will also provide each CCO with a Proposed Subject Month Report or Final Report for each subject month that includes:

- Total number of clean encounters submitted for the subject month.
- Total number of Pended Encounters Not Yet Corrected for the subject month.
- Number of Pended Encounters exceeding 63 days from notification for the subject month.
- Number of encounters identified by the CCO as not yet submitted or corrected and approved by OHA as exceptions.



Monthly Report Card Example: Number of Encounters Awaiting CCO Action

Data Quality			
Pended Encounters (Denied Must Correct)			
Claim Type	0-30 Days	31-62 Days	63+ Days
Professional	🟡 14	🟡 26	✅ 0
Inpatient	🟢 0	🟡 6	✅ 0
Outpatient	🟡 13	🟢 0	✅ 0
Total	🟡 27	🟡 32	✅ 0

Timing of Monthly Report Card and Final Reports, 2013

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Subject Month (SM)	1	2	3	4	5	6	7	8	9	10	11	12
OHA provides monthly report on:	--	SM 1	SM 1-2	SM 1-3	SM 1-4	SM 1-5	SM 1-6	SM 2-7	SM 3-8	SM 4-9	SM 5-10	SM 6-11
OHA provides final report on:	--	--	--	--	--	--	--	SM 1	SM 2	SM 3	SM 4	SM 5

Redistribution of Funds

Any funds collected as a result of the 1% withhold process will be distributed per the provisions of the CCO contract.

For Questions Contact

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