

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

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**STATE OF OREGON
OREGON HEALTH AUTHORITY
HEALTH POLICY AND ANALYTICS DIVISION
SUSTAINABLE HEALTH CARE COST GROWTH TARGET PROGRAM**

In the Matter of:

Cascade Health Alliance LLC, an
Oregon Limited Liability Company

For the Cost Growth Target
measurement period: 2021-2022

Agency No. **CGT-2023-PAYER-07**

**NOTICE OF PROPOSED DETERMINATION
AND RIGHT TO REQUEST A HEARING**

Oregon Health Authority's (OHA) Sustainable Health Care Cost Growth Target Program (CGT) is tasked with monitoring the cost of health care in Oregon and holding payers and provider organizations accountable for cost growth that exceeds the annual target with statistical confidence and without an acceptable reason. The CGT is governed by Oregon Revised Statutes (ORS) 442.385 through 442.386 and Oregon Administrative Rules (OAR) Chapter 409, Division 65.

Per ORS 442.386 and OAR 409-065-0035, OHA reviews underlying cost drivers and reasons for cost growth and makes a determination as to whether such conditions or factors, or combination of such conditions or factors, suffices as reasonable cause for an entity to exceed the cost growth target for the measurement period.

Now, therefore, upon due consideration of the circumstances, including the mandatory cost growth target data submissions, supplemental information provided by the entity, and the entirety of OHA's record, OHA enters the following Notice of Proposed Determination.

Procedural History and Findings of Fact

OHA's CGT conducted its cost growth review under OAR 409-065-0035, which requires that OHA conduct analyses to understand potential systematic causes or other factors that might result in payers or provider organizations exceeding the cost growth target. The cost growth target for 2021 through 2025 is 3.4%.¹

Cascade Health Alliance LLC, an Oregon Limited Liability Company (CHA) is a payer in Oregon and a mandatory reporter under OAR 409-065-0010. On or around April 20, 2023, OHA notified CHA that it was subject to the cost growth target program for the 2023 data cycle, with a data submission due date of September 1, 2023.

On or around September 1, 2023, CHA submitted its mandatory data submission (CGT-1) to OHA. OHA generated a data validation summary on or around September 5, 2023. Due to issues identified in the data submission upon review of this summary and the CGT-1 file, a resubmission was requested of CHA on or around September 10, 2023.

CHA submitted a second version of its file on or around September 19, 2023. OHA generated an updated validation summary of CHA's data on or around September 20, 2023 and held an initial data validation meeting with CHA on October 3, 2023. Due to data issues identified during this meeting, CHA resubmitted an updated version of its CGT-1 data file on or around October 10, 2023. OHA generated an updated validation output summary of CHA's data on or around October 11, 2023 and held a technical assistance meeting for CHA on that same day. Following the technical assistance

¹ The cost growth target value for 2021-2025 was established by the Cost Growth Target Implementation Committee, as documented in their January 2021 Recommendations Report.
<https://www.oregon.gov/oha/HPA/HP/HCCGBDocs/Cost%20Growth%20Target%20Committee%20Recommendations%20Report%20FINAL%2001.25.21.pdf>

meeting, OHA considered CHA's 2023 CGT-1 data submission for measurement period 2022-23 to be final and validated.

On or around May 9, 2024, OHA notified CHA of the cost growth data that were to be reported publicly in OHA's 2024 Cost Growth Target Annual Report, for the 2021-2022 cost growth measurement period. This report was released publicly on or around May 28, 2024.

OHA identified CHA as having cost growth over the target between calendar years 2021 and 2022 for the following markets: **Medicaid, 4.7%.**

On or around July 25, 2024, OHA notified CHA that it had exceeded the cost growth target for the 2021-2022 measurement period pursuant to OAR 409-065-0035(3).

OHA met with CHA in September of 2024 to discuss potential reasons for excess cost growth for Medicaid from 2021-2022. See Attachment 1 for meeting dates and participants. OHA also reviewed data on CHA's risk adjusted rate of growth (RAROG) data for the 2021-2022 period to inform its analysis of the reasons for CHA's cost growth.

Findings of Determining Reasonableness Process

As a result of the reasonableness discussion and data review process, OHA identified the following major cost drivers for CHA from 2021-2022:

- **Increased performance incentive payments, some related to COVID-19** – CHA received additional incentive payments from OHA in 2022 relative to 2021 for facilitating provision of high quality care to its members. Coordinated Care Organizations in Oregon are evaluated on a range of quality metrics that track provision of preventative care, mental health screening, and substance use disorder treatment, among others. During the measurement period under review, some of these payments were related to the COVID-19 response and increased funding from OHA for providers.

PROPOSED DETERMINATION

Following a review of CGT data and additional information on health care spending, OHA has determined that CHA's health care cost growth for Medicaid from 2021-2022 was:

- **Due to acceptable reason(s).** CHA will not be held accountable for cost growth in this measurement period and no further action is required for this measurement period.

Please see Attachment 2 for a running summary of CHA's cost growth performance over time.

Dated this 21 day of January, 2025.

By:



Sarah Bartelmann, MPH
Cost Programs Manager
Oregon Health Authority

IMPORTANT NOTICES

PETITION FOR RECONSIDERATION: You may file a Petition for Reconsideration ("Petition") pursuant to OAR 409-065-0050 within 30 days from the date this proposed order was mailed (See the "Date Mailed" on the first page). The Petition must include the specific grounds for reconsideration, and may be supported by written argument or attachments explaining why you believe OHA erred in its decision. This Petition will initiate an informal review process under OAR 409-065-0050.

The Petition must be submitted via email to HealthCare.CostTarget@oha.oregon.gov.

NOTICE OF RIGHT TO REQUEST A HEARING: You are entitled to a hearing as provided by the Administrative Procedures Act (chapter 183, Oregon Revised Statutes), OAR 409-065-0050 and OAR 137-070-0075. You are entitled to be represented by an

attorney at the hearing. Legal aid organizations may be able to assist a party with limited resources. The Oregon Health Authority will be represented by an Assistant Attorney General from the Oregon Department of Justice.

To request a contested case hearing, your request must be in writing and must be received within twenty (20) calendar days from the date this Order was personally served, mailed, or electronically transmitted to you, based on the date at the top of this document.

A request sent by U.S. mail is “received” on the date it is postmarked. Your request may also be emailed. Your request should be sent to:

HealthCare.CostTarget@oha.oregon.gov

or

421 SW Oak Street, Suite 875
Attn: Cost Growth Target Program
Portland, OR 97204

If you submit a request for a contested case hearing, you will be notified of the time and place of the hearing. Information on the hearing process will be provided to you in accordance with ORS 183.413(2). Any hearing will be conducted by an administrative law judge from the Office of Administrative Hearings, assigned as required by ORS 183.635.

If you fail to request a hearing within the time allowed, if you request a hearing and subsequently withdraw your request for a hearing, if you request a hearing and fail to appear for the hearing, or if a hearing is scheduled and you later notify OHA that you will not appear at the specified time and place, you will have waived your right to a hearing, and this proposed order will become a final order by default. If OHA issues a final order by default, it designates its file on this matter, including all materials that you have submitted relating to this matter, as the record in this case for purposes of proving a prima facie case.

NOTICE TO ACTIVE DUTY SERVICEMEMBERS: Active-duty service members have a right to stay these proceedings under the federal service members Civil Relief Act. For

more information contact the Oregon State Bar at 800-452-8260, the Oregon Military Department at 503-584-3571, or the nearest United States Armed Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military Department does not have a toll-free telephone number.

Attachment 1: Meeting Dates and Participants

Meeting Date	Participants
September 12, 2024	Sarah Bartelmann (OHA), Sam Smith (OHA), Trang Weitemier (OHA), Dawna Oksen (CHA), Danielle Blout (CHA), Brittany Legget (CHA)

Attachment 2: Cost Growth Target Performance Over Time

Cascade Health Alliance’s Medicaid Cost Growth

Measurement Year	Cost Growth %	Status	Determination
2021-2022	4.7%	Not Met	Reasonable