

# Draft Rebaselining Electronic Health Record (EHR) Measures Policy

When OHA determines that a significant change has been made to a given EHR measure's specifications, OHA will allow CCOs to submit practice and organization data for rebaselining. CCOs may also rebase when switching from All Payer to CCO Medicaid Only reporting per the EHR Manual (section 4.4 Payer Type). However, this policy will focus on rebaselining for measure specification changes only.

For measures in the CCO Quality Incentive Program, improvement targets for the incentive measures are based off the previous year's data. Improvement targets allow CCOs to receive credit for the Quality Incentive Measure funds without meeting the benchmark. Rebaselining will ensure that CCOs' improvement targets are calculated with the most comparable information possible when significant changes are made to a measure.

OHA subject matter experts will determine whether rebaselining is appropriate for EHR measures and will notify CCOs of the opportunity to submit data for rebaselining. CCOs can petition for rebaselining by submitting the reason with technical details and, if possible, supporting data to [Metrics.Questions@odhsoha.oregon.gov](mailto:Metrics.Questions@odhsoha.oregon.gov). When a measure opens for rebaselining, CCOs can then choose to submit their EHR data for rebaselining. To rebase, a CCO must resubmit all organizations and practices for rebaselining who submitted during the previous measurement year. If it is not possible to rebase due to contractual reasons with the EHR vendor or other data limitations, CCOs must submit the reason for each group and OHA will review on a case-by-case basis.

All practices and organizations must calculate the previous year's results using the current measurement year's specifications on the prior year data. For example, if 2024 measure's improvement targets are being recalculated, the full 2024 specifications must be used on the 2023 data to calculate the new 2023 results. Organizations and practices must report the metric with the same parameters as previously used for:

- Report Type
- Level of Data Aggregation
- Payer Type
- Measurement Period

After recalculating, the practices and organizations will provide the data to their CCO. The CCO will then submit the data to OHA at the same time as the current year's data submission in a separate rebaselining template.

Rebaselined data will undergo a similar review as the current year's data submission. OHA will accept the CCO submission for rebaselining if:

- Rebaselined data passes the standard required data validations.
- The new submission appears feasible given the original 2023 submission.
- OHA approved the practices or organizations' petitions to forgo rebaselining due to technical or contractual issues.

Once the data have been accepted by OHA, the improvement target will be recalculated for the current measurement year. The calculation will use data from all organizations and practices who submitted in previous measurement year. This means that OHA will use the original data for organizations and practices who could not recalculate the measure along with the groups that were able to recalculate. No new practices can be included in the improvement target calculation, even if they are submitting in current measurement year.

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