



OREGON  
**HEALTH**  
AUTHORITY

Recorded August 29, 2024

# Oregon Cost Growth Target Program **CGT-4 Frontline Worker Compensation 2024 Data Submission Training**

<https://www.oregon.gov/oha/HPA/HP/Pages/Cost-Growth-Target-for-Provider-Orgs.aspx>



# Housekeeping

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This training is being recorded and a link to the recording is posted on the [CGT Provider Organization](#) webpage.



# Training Purpose

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## Audience

- Technical staff (of *provider entity*/data reporter organizations) who will be compiling and submitting the CGT-4 data files to OHA by December 6, 2024\*.

## Purpose

- Provide an overview of technical submission requirements for the Oregon Cost Growth Target Program's annual frontline worker compensation data submission (CGT-4).

- \* In subsequent years, the annual due date will be the first Friday in September



# Agenda

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- 1 Overview of OR's Cost Growth Target Program
  - 2 Overview of data captured (CGT-4)
  - 3 Data collection + validation process
  - 4 Contact information + resources
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# Overview of Oregon's Cost Growth Target Program

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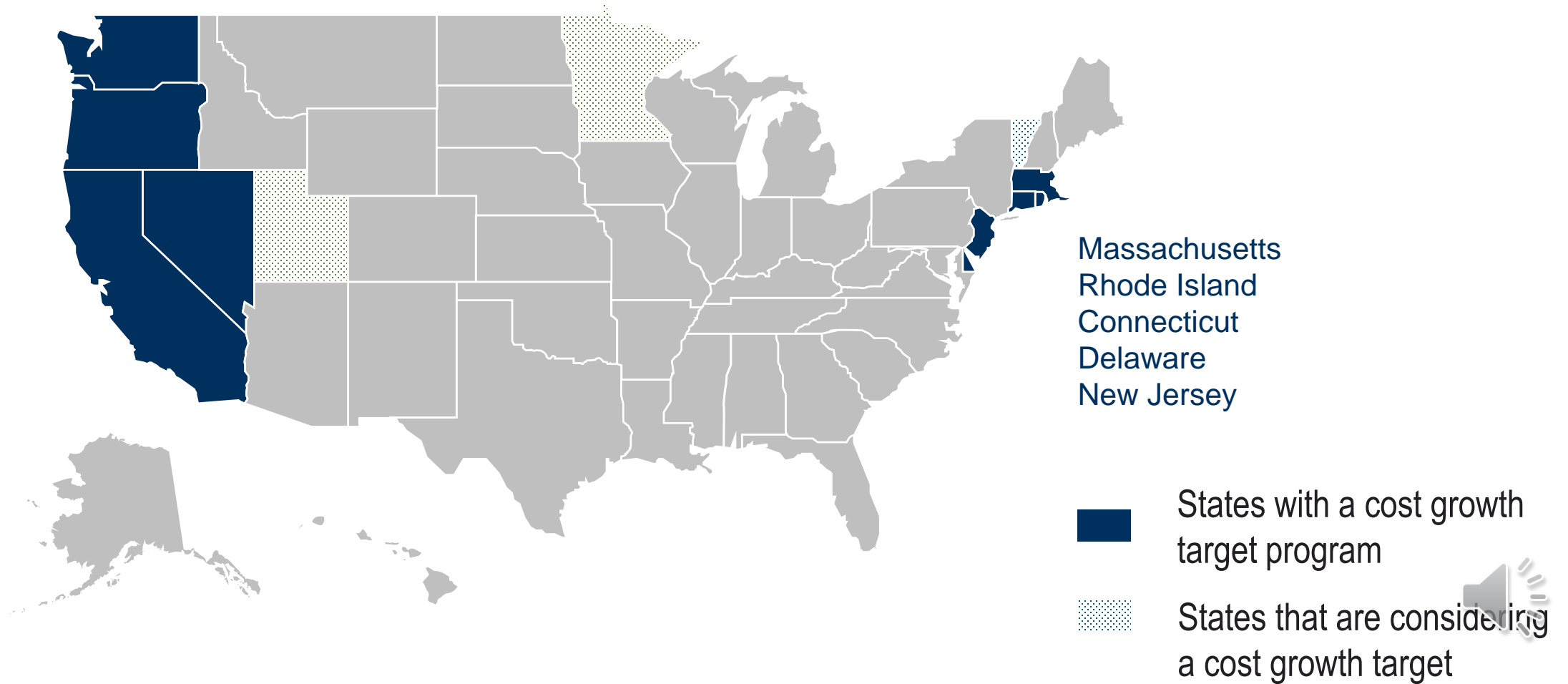


# Oregon's Sustainable Health Care Cost Growth Target Program

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- Established by Oregon Senate Bill 889 (2019); [ORS 442.385, 442.386](#)
  - Initial groundwork laid through SB419 (2017) Joint Interim Task Force on Health Care Costs (started with hospital rate setting)
  - Purpose is to create a more affordable and sustainable health care system in Oregon through **transparency, a sustainable growth target, total cost of care approach, and a common goal**
- Implementation Committee's final [recommendations report](#) was submitted to the Oregon Legislature Jan 2021
- Background and additional resources available online  
<https://www.oregon.gov/oha/HPA/HP/Pages/Sustainable-Health-Care-Cost-Growth-Target.aspx>

# Oregon was the 4<sup>th</sup> state to establish a statewide health care cost growth target program





**Oregon's cost growth target says that total health care spending should not grow more than 3.4% each year.**



# Annual Cycle



Starting 2024, provider organizations will submit a CGT-4 each year

Payers have been submitting the CGT-1 file since 2021



# Frontline workforce compensation as an acceptable reason for cost growth

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- **2021:** The Cost Growth Target Implementation Committee started an [initial list](#) of potential factors in anticipation of accountability work.
- **2022:** CGT Advisory Committee added [macroeconomic factors](#) as a potentially acceptable reason an accountable entity may reasonably exceed the cost growth target. Pay increases for frontline workforce is included as an example.
- **2023:** [HB 2045 \(2023\)](#) specified that a provider [organization] shall not be accountable for cost growth resulting from total compensation provided to frontline workers.
- **2024:** CGT accountability rulemaking discussions resulted in this new requirement ([OAR 409-065-0028](#)) for large and medium sized provider organizations to submit frontline worker compensation data annually.



# Annual CGT-4 Submission Schedule

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Due Date	Annual Data Submission
<b>Dec 6, 2024</b>	CY 2022 and 2023 compensation
<b>Sep 5, 2025</b>	CY 2023 and 2024 compensation
<b>Sep 4, 2026</b>	CY 2024 and 2025 compensation

After 2024, file will be due the first Friday of September



# Overview of data captured (CGT-4)

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# Frontline Workforce Compensation Data Submission

## Who is required to submit data?

Medium and large provider organizations identified using 2023 CGT data (28 entities). Contacted in late July 2024.

## What is the required data submission?

New [CGT-4 template](#) found on [CGT Provider Organization](#) webpage.

## What data is being collected?

Frontline workforce compensation (compensation, benefit expenses, payroll hours, etc.)

Input total organization expenses for <i>all worker</i> types, not just frontline workers	
	Current Calendar Year
<i>Enter year</i>	
Grand total operating expense	
Grand total payroll expense (\$)	
Grand total payroll hours (#)	
Grand total benefit expense (\$)	
Grand total contracted labor expense (\$)	
Input total organization expenses for frontline workers	
	Current Calendar Year
<i>Enter year</i>	
Grand total frontline worker compensation	



# Overview of CGT-4

CGT-4 template [link](#) found on the [CGT Provider Organization webpage](#).

**Contents tab** includes basic information

- Template version, due date, measurement years
- Tab contents:

This workbook contains the following tabs:		
Tab Name	Contents	
1. Cover Page	Provider organization info and data submission confirmation	<i>Required</i>
2. Frontline_Worker_Current	Total annual compensation to frontline workers - Current Year	Optional
3. Frontline_Worker_Previous	Total annual compensation to frontline workers - Previous Year	Optional
4. Non_Frontline_Current	Total annual compensation to non-frontline workers - Current Year	Optional
5. Non_Frontline_Previous	Total annual compensation to non-frontline workers - Previous Year	Optional
6. Annual_Adjustment	Annual adjustment to compensation threshold for reporting. No data entry required.	N/A
7. Definitions	Definition of terms and other instructions	N/A

# Overview of CGT-4

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**Only the Cover Page tab is required for the CGT-4 to be considered complete,** however, completing the additional/optional tabs provides more supporting information.

This could save time and effort ahead of potential reasonableness conversations due to observed high-cost growth.



# Overview of CGT-4

Snapshot of required data on **Cover Page** tab

Input total organization expenses for <i>all worker</i> types, not just frontline workers			
	Current Calendar Year	Previous Calendar Year	
<i>Enter year</i>			[Input Required]
Grand total operating expense			[Input Required]
Grand total payroll expense (\$)			[Input Required]
Grand total payroll hours (#)			[Input Required]
Grand total benefit expense (\$)			[Input Required]
Grand total contracted labor expense (\$)			[Input Required]
Input total organization expenses for frontline workers			
	Current Calendar Year	Previous Calendar Year	
<i>Enter year</i>			[Input Required]
Grand total frontline worker compensation			[Input Required]



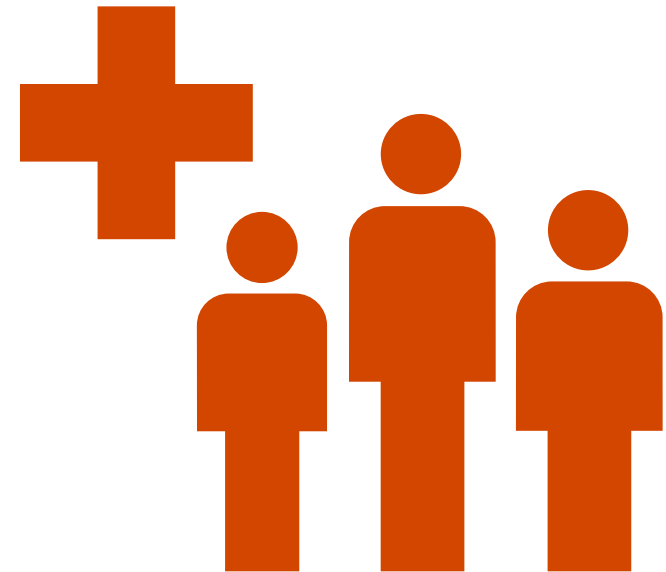


# Optional Frontline and Non-Frontline Tabs

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**Frontline and Non-Frontline workers** are stratified by *Setting*\* then by *Worker type*

- Data input fields include
  - Person hours (#)
  - Wages/salaries/incentives/bonuses (\$)
  - Benefits (\$)
- For frontline workers, input fields are separated for represented and non-represented
- Each year has its own tab



\* For any employee who works in multiple settings, include their hours and costs in the setting in which they work the most.

# Optional Frontline and Non-Frontline Tabs

Snapshot of optional frontline worker data tab

Note there is an *Other Worker Type* category

Setting	Worker Type	Total person hours of represented employees (#)	Total wages, salaries, bonuses, and incentive payments to represented employees (\$)
Clinic workers	Registered Nurses, Certified Registered Nurse Anesthetists, Clinical Nurse Specialists		
	Certified Nursing Assistants, Licensed Practical Nurses, Medical Assistants		
	Nurse Practitioners, Physician Assistants		
	Physicians (MD, DO)		
	Pharmacists		
	Certified Pharmacy Technicians		
	Medical Imaging Technologists		
	Counselors, Therapists		
	Licensed Clinical Social Workers, Clinical Social Work Associates, Non-clinical social workers		
	Occupational Therapists, Physical Therapists, Therapy Assistants		
	Respiratory Therapists, Polysomnographic Technologists		
	Licensed Dieticians		
	Other Technicians and Technologists		
	Other		



# Optional Frontline and Non-Frontline Tabs

Snapshot of optional frontline worker data tab

*Contracted direct care workforce and administrative (non-direct care) workforce compensation are collected in the last rows*

All other workers who cannot be classified in the above categories should be reported in *Other (non-direct care)*

5		Other Technicians and Technologists		
7		Other		
8	<b>Contracted Direct Care labor</b>			
9	<b>Administrative (non-direct care) workers</b>			
0	<b>Other (non-direct care) workers</b>			



# Reference Tabs: Annual Adjustment

Provider organizations are not required to enter any data on this tab.

6. Annual Adjustment			
The threshold for reporting is total annual compensation is less than \$200,000, adjusted annually to Index for All Urban Consumers, West Region (All Items), as published by the Bureau of Labor Statis			
The Oregon Health Authority will complete this table annually. <b>Provider organizations are <u>not requ</u></b>			
Data reported in (year)	Compensation earned in (year)	CPI adjustment	Compensation threshold (\$)
2024	2023	-	200,000
2025	2024		
2026	2025		
2027	2026		
2028	2027		
2029	2028		
2030	2029		



# Reference Tabs: Definitions

Provider organizations are not required to enter any data on this tab.

	A	B
1	<b>7. Definitions for terms in this template</b>	
2		
3	<b>Term</b>	<b>Definit</b>
4	Frontline worker	Any worker whose total annual compensation is less than \$21 changes in the Consumer Price Index for All Urban Consumer of Labor Statistics of the United States Department of Labor, i
5	Total compensation	Wages, benefits, salaries, bonuses and incentive payments p frontline workers.
6	Grand total operating expense	The sum of all expenses incurred through normal business op supplies, equipment, contract services, management fees, d insurance, rent, and marketing.
7	Grand total payroll expense (\$)	The total amount paid for hourly and salaried employees of t reporting period including bonus or incentive payments. Do i include contracted labor expenses.
8	Grand total payroll hours (#)	Total hours worked for all hourly and salaried employees of t frontline and non-frontline workers.
		The total amount paid for expenses incurred for employee b



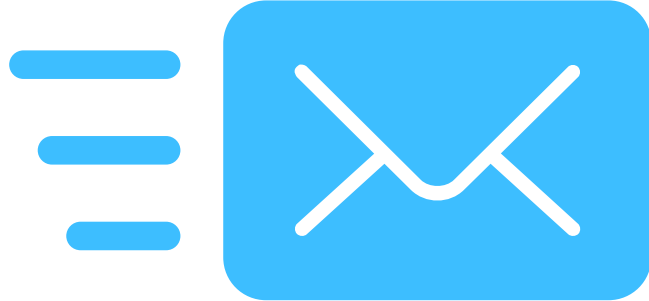
# Data collection + validation process

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# File Submission

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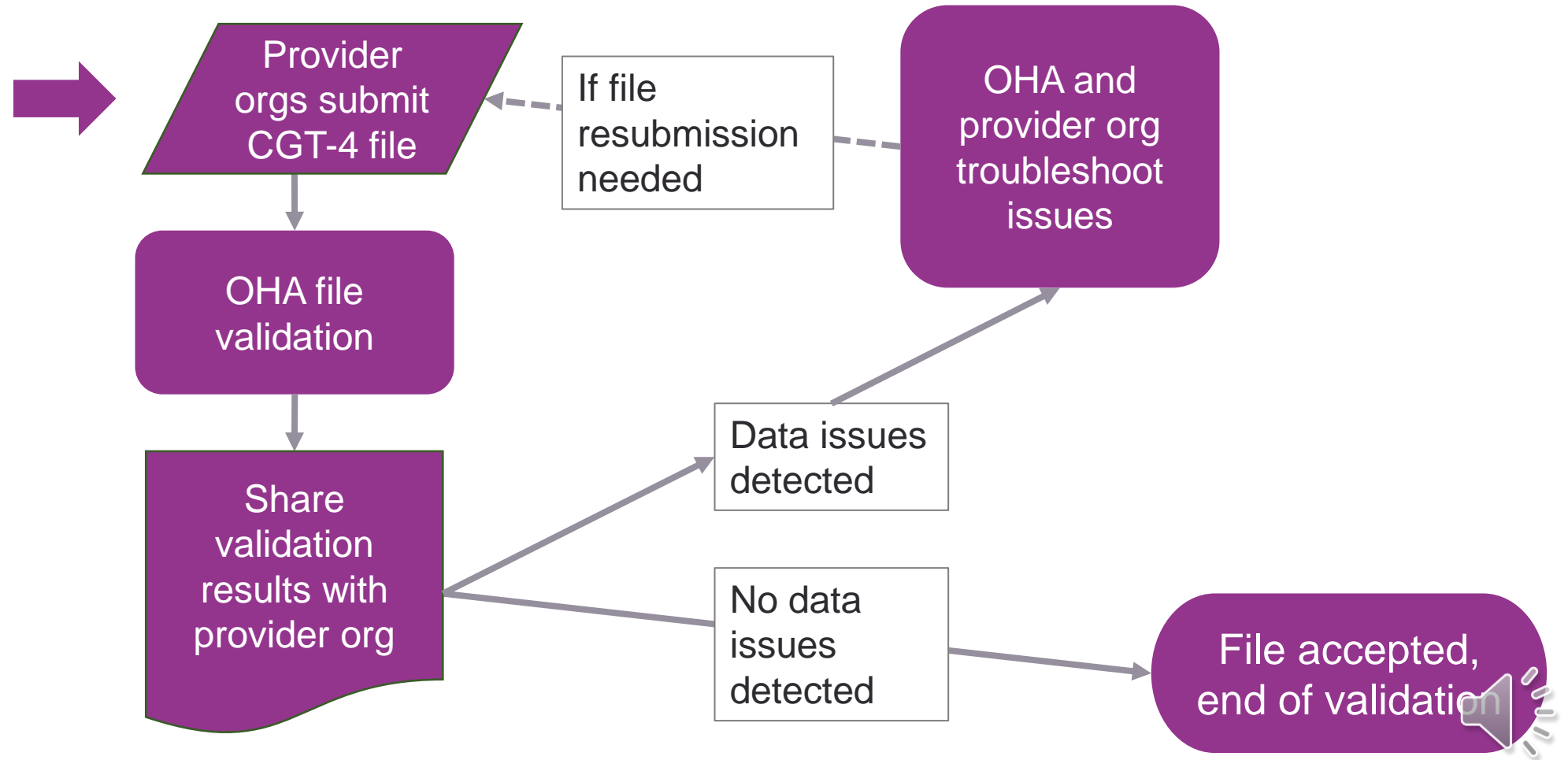


CGT-4 files should be emailed to [HealthCare.CostTarget@oha.oregon.gov](mailto:HealthCare.CostTarget@oha.oregon.gov) by end of day **December 6, 2024**



# 2024 CGT-4 Validation

CY 2022-2023 spending





# Example validation checks

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$$\text{Total Compensation} = \text{Total Payroll Expense} + \text{Total Benefit Expense} + \text{Total Contracted Labor Expense}$$

$$\text{Total Operating Expense} = \text{Total Compensation} + \text{Other expenses not collected in CGT-4}$$

$$\text{Total Frontline Compensation} < \text{Total Compensation}$$



# Contact information + resources

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# Upcoming Resources

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## Data Submission Office Hours

- Sep 25 during [CGT TAG](#)
- Oct 23 during [CGT TAG](#)

The CGT Technical Advisory Group (TAG) is open to staff from payers, provider organizations, and other interested parties. Topics address technical aspects related to data submission templates, specifications, and the data validation process.

To join the CGT TAG email list or ask OHA staff a question, email [HealthCare.CostTarget@oha.oregon.gov](mailto:HealthCare.CostTarget@oha.oregon.gov)



# Thank you

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You can get this document in other languages, large print, braille or a format you prefer free of charge. Contact the CGT Program at [HealthCare.CostTarget@oha.oregon.gov](mailto:HealthCare.CostTarget@oha.oregon.gov) or 503-801-5923 (voice/text). We accept all relay calls.

Health Policy and Analytics Division  
Office of Health Policy  
Oregon Sustainable Health Care Cost Growth Target Program



<https://www.oregon.gov/oha/HPA/HP/Pages/Sustainable-Health-Care-Cost-Growth-Target.aspx>

