

# Supporting Health for All through REinvestment (SHARE) 2025 Program Changes



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## **Agenda**

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  - Identifying changes to SHARE
- Changes to SHARE
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  - Reinvestment criteria
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## Supporting Health for All through REinvestment (SHARE)

- SHARE comes from a legislative requirement for coordinated care organizations (CCOs) to invest some of their profits back into their communities.
- After meeting minimum financial standards, CCOs must spend a portion of their net income or reserves on services to address health inequities and social determinants of health and equity (SDOH-E).
- 2024 was the fourth year of the SHARE program.

## Identifying changes to SHARE

- In the first half of 2024, the Governor's Office and Oregon Health Authority (OHA) convened CCO leadership to recommend changes to CCO financial policies, including SHARE.
- Goals of this effort:
  - Spur greater reinvestment in community
  - Align with the Governor's priorities
  - Reduce community recipient burden
  - Maximize flexibility
  - Increase cohesion across financial policies

## **Changes to SHARE**

In December 2024, OHA notified CCOs that OHA will be implementing **four changes** related to SHARE from this effort.

- 1. Reporting and accountability
- 2. Reinvestment criteria
- 3. Financial set-aside
- 4. Financial carry forward

## Impacts of changes

- The changes expand the flexibility of CCO reinvestments.
- All activities previously SHARE-funded will still be allowable.
- The changes will impact:
  - CCOs' SHARE reporting process
    - How CCOs report to OHA
    - How SHARE reinvestments are reported publicly
  - The type of SHARE reinvestments CCOs make
  - The timing of CCOs' SHARE reinvestments



## Change #1: Reporting and accountability

## Spending plan attestation

Change: Replace OHA pre-approval of CCOs' SHARE spending plans with CCO spending plan attestation.

Attestation will include a brief table of spending details (not subject to OHA approval).

#### **Timing:** 2025

- CCOs will attest to meeting SHARE requirements annually by December 31.
- OHA will issue a 2025 CCO contract waiver memo for shift to attestation.

## **Posting SHARE investments**

Change: Move to CCO public posting of SHARE investments to maintain public transparency.

CCOs will choose the format.

Timing: Applies to 2026 investments

OHA will update the 2026 CCO contract with details and timeline.



## Change #2: Reinvestment criteria

## **Expand reinvestment criteria**

Change: Add "Health care access and quality" as an SDOH-E domain.

- Access to care investments intended to reduce disparities would be allowed as long as they're not supplanting a Medicaid covered service or other CCO requirements within their global budget.
- All previous SHARE-funded activities will still be allowable.

#### **Timing:** 2025

• OHA will draft changes to <u>Oregon Administrative Rule 141-414-3735</u>, open a rules advisory committee (RAC) in April 2025 and apply final changes to 2025 SHARE spending plan attestation.



## Change #3: Financial set-aside

#### Financial set-aside

Change: CCOs may choose to set aside up to 25% of their annual designations to allocate to partners (and report to OHA) within three years.

• If choosing to do this, a CCO would submit their spending plan attestation with up to 25% of funds not yet allocated to partners and would report it in a future year's attestation once the partners are known.

#### **Timing: 2025**

• This set-aside flexibility is allowed currently, but it will be clarified in 2025 SHARE guidance.



## Change #4: Financial carry forward

## Financial carry forward

Change: CCOs may choose to count SHARE spending beyond a given year's required amount to meet a future year's SHARE requirement (within three years).

#### **Timing:** 2025

- OHA will draft changes to <u>Oregon Administrative Rule 141-414-3735</u>, open a rules advisory committee (RAC) in April 2025 and apply final changes to 2025 spending plan attestation.
- CCOs will report this decision to OHA through annual attestation (Dec. 31).

## SHARE financial reporting stays the same

#### Exhibit L reporting on SHARE continuing from 2024:

- Report L6.7 SHARE obligation for previous year based on formula and SHARE designation if more than obligation
- Report L6.71 Total SHARE spending and per partner spend down from previous years



## Questions submitted through webinar registration

## How do these changes impact how funding decisions are made?

- Each CCO will continue to have their own SHARE funding decision process.
   This includes the requirement for Community Advisory Councils (CACs) to be a part of spending decisions. SHARE investments must also still align with CCOs' community health improvement plans (CHPs).
- CCOs won't submit SHARE spending plans for OHA to approve before funding projects. This will be replaced by an attestation.
- CCOs will have more flexibility to meet the goals and activities in their CHP through SHARE investments. CCOs may:
  - Invest in reducing disparities in health care access and quality.
  - Carry forward excess SHARE spending to count toward future years' requirements.
  - Set aside funds for future years.

## How do these changes impact community partners?

- Community partners can learn about their local CCO's SHARE investments posted on the CCO's website.
- SHARE funding will support a broader range of SDOH-E activities and projects. Examples:
  - CCOs may invest in community partners working on health care access and quality.
  - CCOs may decide to fund larger, more impactful projects with a community partner and count any extra SHARE spending toward their future years' SHARE obligation.
  - CCOs may decide to set aside funds so they have more time to identify a community partner to meet a need.

## Do these changes impact traditional health worker programs and trainings allowable through SHARE?

- All previous SHARE-funded traditional health worker (THW) activities will still be allowable. Past THW funded efforts include:
  - THW trainings and outreach to recruit participants
  - THW certification costs
  - Establish Medicaid billing infrastructure for THW services
  - Launch and grow THW support networks or collaboratives, regional planning efforts to integrate and sustain THW workforce
  - Non-covered THW services, such as community health workers providing non-covered outreach and housing navigation services and peer support specialists providing noncovered substance use support
- SHARE funding may not be used for Medicaid-covered services (no change).
- OHA will provide more guidance in this area later in 2025.

## Implementation timeline

- April 2025 Rules advisory committee is opened.
- ~July 2025 OHA releases 2025 CCO contract waiver memo, attestation form and final 2025 SHARE guidance.
- By December 31, 2025 CCOs submit 2025 SHARE spending plan attestation.
- 2026 Final changes included in the 2026 CCO contract.



## Questions

#### Resources

- OHA SHARE webpage
- CCO memo (12/13/24)
- 2025 SHARE office hours
  - February 13, 1:30–2 p.m.
  - Join here

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## Thank you

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