

# Memorandum

**To:** Coordinated care organizations (CCOs)

**From:** Dave Baden, Deputy Director for Policy and Programs

**Date:** December 13, 2024

**Subject:** 2025 Changes to SHARE (Supporting Health for All through Reinvestment)

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The Governor's Office and Oregon Health Authority (OHA) convened CCO leadership for a series of meetings during the first half of 2024 to review current financial policies (including SHARE) and make recommendations, if any, to the Governor and OHA director to spur greater reinvestment in community, align with the Governor's key priorities, reduce community recipient burden, maximize flexibility, and/or increase cohesion across financial policies.

OHA will be implementing four recommendations from this effort related to SHARE. These changes will affect:

- The reporting process for CCOs' reinvestment of SHARE dollars
- The type of SHARE reinvestments CCOs make
- The timing of CCOs' SHARE reinvestments
- How information about SHARE reinvestments is shared publicly

These changes all expand the flexibility of CCOs' investments; all previous SHARE-funded activities will still be allowable.

This memo outlines these changes and related timelines. More guidance will be provided in summer 2025 once the rule changes noted below are finalized.

**Change #1: Reporting and accountability** – Replace OHA pre-approval of CCOs' SHARE spending plans with CCO spending plan attestation. Move to CCO public posting of SHARE investments to maintain public transparency.

- *Desired outcome(s):* Maintain CCO accountability and transparency of SHARE spending while allowing CCOs to be more responsive to community needs.

- *Process for change:* Two phases: (1) For 2025, OHA will issue a CCO contract waiver memo for the shift to attestation; (2) For 2026, OHA will update the CCO contract requiring CCOs to publicly post SHARE investments.
- *Details/considerations:* Attestation will include CCOs submitting to OHA a brief table of spending details (not subject to OHA approval). Starting in 2026, CCOs will also publicly post a SHARE report in a format of their choosing.
- *Implementation year:* Attestation in 2025 (due Dec. 31, 2025; public posting in 2026).

**Change #2: Reinvestment criteria** – Expand SDOH-E definition/reinvestment criteria for more SHARE spending flexibility.

- *Desired outcome:* Allow CCO SHARE reinvestments to better align with community needs and community health improvement plans, including investments related to access to care and health disparities.
- *Process for change:* OHA will draft changes to [Oregon Administrative Rule 141-414-3735](#), open a Rules Advisory Committee (RAC) in April 2025, and apply final changes to 2025 SHARE spending plan attestation.
- *Details/considerations:* SDOH-E domains may be revised. Access to care investments intended to reduce disparities would be allowed as long as they are not supplanting a Medicaid-covered service or other CCO requirements within their global budget.
- *Implementation year:* 2025 spending plan attestation (due Dec. 31, 2025)

**Change #3: Financial set-aside** – CCOs may choose to set aside up to 25% of their annual designations to allocate to partners (and report to OHA) within three years.

- *Desired outcome:* Increase flexibility for CCOs to respond to community needs.
- *Process for change:* This set-aside flexibility is allowed currently, but 2025 SHARE guidance will provide clarification, including the expectation that the set-aside not exceed 25% of the CCO's SHARE obligation. If choosing to do this, a CCO would submit its 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.
- *Implementation year:* Currently allowed; will be clarified for 2025.

**Change #4: Financial carry forward** – When a CCO spends more on SHARE than required for a given year, the CCO may choose to count the extra amount toward a future year's SHARE requirement (within three years).

- *Desired outcome:* Increase flexibility for CCOs to respond to community needs.
- *Process for change:* OHA will draft changes to [Oregon Administrative Rule 141-414-3735](#), open a Rules Advisory Committee (RAC), incorporate final changes into the 2026 CCO contract and clarify in SHARE guidance.
- *Implementation year:* 2025 spending plan attestation (due Dec. 31, 2025)

**Key dates:**

- April 2025 – Rules Advisory Committee
- ~July 2025 – OHA releases attestation form and final 2025 SHARE guidance
- December 31, 2025 – CCOs submit 2025 SHARE plan attestation

In the meantime, CCOs may proceed with their annual SHARE planning processes. If you have questions, please email [Rachel.E.Burdon@oha.oregon.gov](mailto:Rachel.E.Burdon@oha.oregon.gov) and [Laura.E.Kreger@oha.oregon.gov](mailto:Laura.E.Kreger@oha.oregon.gov).