OREGON OFFICE of RURAL HEALTH

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OPPORTUNITY Just knock.

OHSU

2026 Oregon Rural Health Conference Presentation Slides

The Change in Scope (CiS) Process for Rural Health Clinics (RHCs) and Federally Qualified Health Centers (FQHCs)

Adrienne Cooke – Oregon Health Authority, Federally Qualified Health Centers and Rural Health Clinics Policy Analyst

Medicaid Division

Safety Nets

Agenda

- Defining a Change in Scope
  - Federal and State guidelines
- Outlining the Process
  - Steps and timelines
- Needed Documentation
  - Narrative
  - Cost Report
- Common Issues
- Questions



Defining a Change in Scope

What is a Change in Scope (CiS)?

Federally mandated under the following –

42 USC § 1396a(bb)(3)(B)

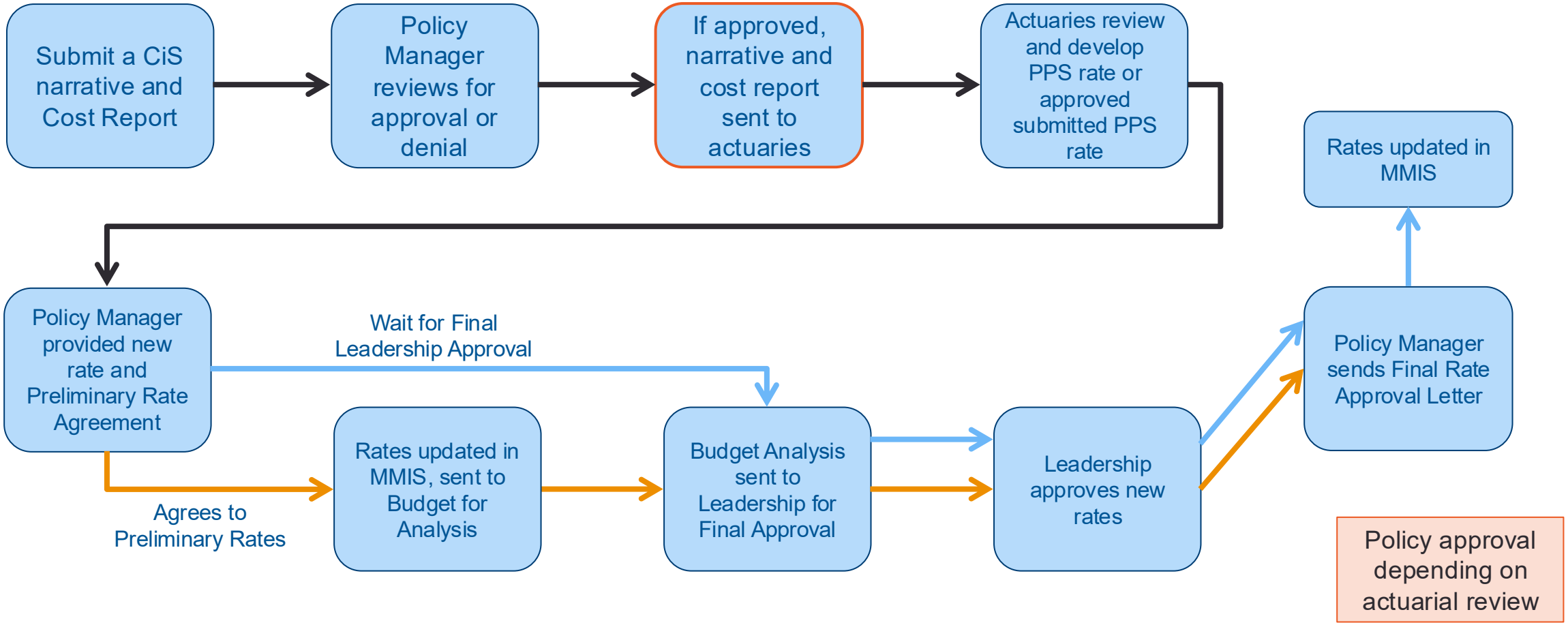
SHO # 10-004 – defines a CiS as a "change in the type, intensity, duration and/or amount of services."

OAR 410-147-0362 Change in Scope of Services



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The CiS Process

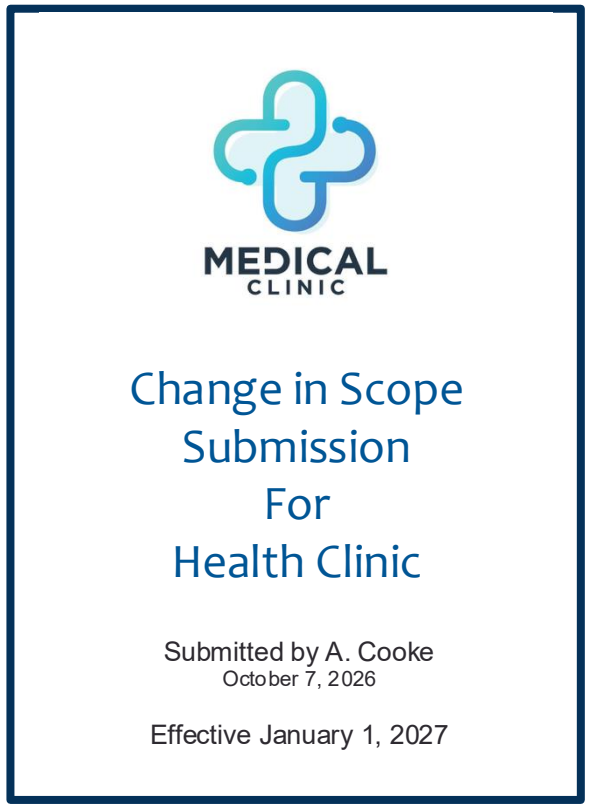


Needed Documentation

- CiS Narrative
  - Overall picture of the clinic or health center prior to and after CiS qualifying events.
  - Clearly demonstrate changes –
    - Type
    - Intensity
    - Amount
    - Duration
- 1008 CiS Cost Report
  - Not a rebasing.
  - Must result in a 5% or more change in cost per visit.
  - Current rate must be trended forward only with MEI.
  - Clearly identify costs associated with each qualifying event.

CiS Narrative

- Overall picture of and needs of the community.
- Identify requested effective date
- Qualifying Events
  - **Type** – new discrete service: Behavioral Health, dental, maternity care, etc.
  - **Intensity** – services that do not require a face-to-face visit: adopting/updating EHR, increase care coordination, addition of laboratory/ radiology services, etc.
  - **Amount** & **Duration** – longer visits or more services/ procedures per visit, can be attributed to change in types of patients served (chronic conditions, homeless, elderly, etc.) , should also correspond with a change in service delivery model.



Cost Report

- Review done by Office of Actuarial and Financial Analytics (OAFA).
  - Validate data, review costs with policy

	A	B	C	D
	RQHC/RHC - Change in Scope			
	Present PPS=	R	$ 346.64	current rate
	Present total visits=	PV	13,423	
	R x PV =	$ 4,652,949		
	Expected change in costs=	C	$7,787,599	
	Expected change in visits=	CV	19,272	
	New Rate =	(RxPV) + C	$12,440,548	
	$380.50	(PV+ CV)	32,695	
2	New Rate (2024):	$380.50		
3	MEI (2025) estimate	3.50%		
4	MEI calculation	$13.31		
5	**NEW RATE WITH MEI**		**$393.82**	
5	**9.77%**			
7	**13.6%**			
8	Difference in old/new rate:	$47.18		
9	Previous Rate	$346.64		
0	New Rate	$393.82		
1	Additional revenue based on # of encounters:	$1,542,486		

Rate Estimate Sheet

Cost Report

#	Qualifying Event	Pre CIS Costs	Brought Forward by MEI	Current Costs	Projected Costs	**Allowable/Approved Costs** ((Current Costs MINUS Pre CIS Brought Forward by MEI)+Projected Costs)	Additional New Visits (Distinct)	Projected New Distinct Visits if Reporting Projected Costs
1	OCHIN Implementation	$496,997	$539,608	$647,615	$790,000	$898,007		
2	Addition of a Population Health Team			$283,949	$148,241	$432,190		
3	Addition of a Dental Assistant Training Program				$218,182	$218,182		
4	Addition of Dental Prevention/Teledentistry Services				$46,797	$46,797		84
5	Addition of Cone-Beam Computed Tomography (CBCT) Imaging and Dental Implant Services				$79,479	$79,479		
6	Addition of Dental Sleep Apnea Oral-Appliance Therapy				$32,537	$32,537		32
7	Addition of Digital Intraoral Scanner – Cave Junction Clinic				$19,854	$19,854		
8	Addition of a Primary Care Director				$117,821	$117,821		
9	Addition of a Clinical Education Director				$194,387	$194,387		
10	Westbrook Administation Expansion			$126,000		$126,000		
11	Addition of Dental Diabetic Screening Integration				$49,629	$49,629		134
12	Expansion of Finance Department			$136,845	$93,327	$230,172		
13	Expansion of Human Resources Department			$189,921	$49,409	$239,330		
14	Expansion of I.T. Department			$223,281	$37,323	$260,604		
15	Addition of Clinical Supervisors			$548,546	$135,040	$683,586		
16	Addition of Marketing Director			$92,252	$40,347	$132,600		
17	Addition of Chief Strategy Officer			$188,004		$188,004		
18								
	Total	**$496,997**	**$539,608**	**$2,436,414**	**$2,052,373**	**$3,949,179**	0	250

Rate Estimate Sheet

Cost Report

	Additional revenue based on # of encounters:	$2,432,332			3.5%					
	Projected costs are on CY25 Basis. Must reduce all projected costs by 2025 MEI to match 2024 rate period (2025									
#	**Qualifying Event**	Pre CIS Costs	Brought Forward by MEI	Current Costs	Projected Costs	**Allowable/Approved Costs** ((Current Costs MINUS Pre CIS Brought Forward by MEI)+Projected Costs)	Additional New Visits (Distinct)	Projected New Distinct Visits if Reporting Projected Costs		cost/visit
1	OCHIN Implementation	$496,997	$539,608	$647,615	$763,286	$223,678			790k incremental costs assumed incre	
2	Addition of a Population Health Team			$283,949	$143,228	$427,177				
3	Addition of a Dental Assistant Training Program				$210,804	$210,804				
4	Addition of Dental Prevention/Teledentistry Services				$45,215	$45,215		158	scale to 158 visits; include all visits in I	
5	Addition of Cone-Beam Computed Tomography (CBCT) Imaging and Dental Implant Services				$76,791	$0			confirmed with Dental team that these	
6	Addition of Dental Sleep Apnea Oral-Appliance Therapy				$31,437	$31,437		60	scale up to 60 visits; include all visits ir	
7	Addition of Digital Intraoral Scanner – Cave Junction Clinic				$19,183	$19,183				
8	Addition of a Primary Care Director				$113,837	$113,837			is this just to handle higher volume of s	
9	Addition of a Clinical Education Director				$187,813	$187,813				
10	Westbrook Administation Expansion			$126,000		$0			attributing to growth, does not meet re	
11	Addition of Dental Diabetic Screening Integration				$47,951	$47,951		134		
12	Expansion of Finance Department			$136,845		$136,845			Removed Senior Accountant from CiS	
13	Expansion of Human Resources Department			$189,921	$47,738	$237,659				
14	Expansion of I.T. Department	$196,680	$213,543	$223,281	$36,061	$45,799			Clinic provided salary for prior IT mana	
15	Addition of Clinical Supervisors			$548,546	$130,474	$679,019				
16	Addition of Marketing Director		$0	$92,252	$38,983	$0			not allowed in PPS rate	
17	Addition of Chief Strategy Officer	$159,989.28	$173,706	$188,004		$14,298			Clinic provided salary for Senior Direct	
18										
	Total	**$853,666**	**$926,857**	**$2,436,414**	**$1,892,801**	**$2,420,716**	0	352		**$4,329,215** T

Rate Estimate Sheet

Additional Cost Report Information

- Payroll/ Wage Report

Employee Code	Position	Department Desc	Gross (FY 202	Gross Hours (FY 2024)	FTE	Admin Time	Medicaid Pg 3	Medicaid Pg 4 A - G=Medical H - J =Dental M - R=	Assign of Costs to Type Med/Dent/BH Allocation	Triggering Event	Notes	Hire Date		Termination Date	Salary	Annual Salar	Rat
1131	Back Office Lead	Medical	57,130.03	2172.45	1.00		8.00	1G		Add of Clinical Spvrs		03/04/2024		00/00/0000	10512.81	273,333.00	
1155	OR MEDICAL ASSISTANTS	Medical	64,247.03	2299.15	1.00		8.00	1G		Add of Clinical Spvrs		06/10/2024		00/00/0000	11076.5	287,989.00	
0979	OR MEDICAL ASSISTANTS	Walk-In Clinic	44,885.48	2058.14	0.99		8.00	1G		Add of Clinical Spvrs		01/31/2022		00/00/0000	11346.15	295,000.00	
0967	OR DENTAL ASSISTANTS	Dental	71,126.47	2337.22	1.00		12.00	10J		Add of Clinical Spvrs		11/01/2021		00/00/0000	11249.15	292,478.00	
1021	RECEPTION INFO CLERKS	Medical Support Services	71,134.23	2365.37	1.00		27.00	33.00	8.00	Add of Clinical Spvrs		10/10/2022		00/00/0000	13929.35	362,163.00	
1105	RECEPTION INFO CLERKS	Medical Support Services	66,121.36	2304.11	1.00		27.00	33.00	8.00	Add of Clinical Spvrs		10/23/2023		00/00/0000	11230.77	292,000.00	
0453	RECEPTION INFO CLERKS	Dental Support Services	59,619.86	2150.27	1.00		28.00	33.00	9.00	Add of Clinical Spvrs		02/03/2011		07/03/2024	4442.31	115,500.00	
0393	C LEVEL EXECUTIVE	Information Technology	148,063.32	2080	1.00		25.00	33.00		Add of CSO	role change	09/25/2008		00/00/0000	5121.54	133,160.00	
0774	Director of Marketing	Marketing	72,653.67	1480	0.71		25.00	33.00		Add of Marketing Directo	On leave par	01/07/2019		09/04/2023	5670.69	147,438.00	
1091	OR RN	Quality Improvement	109,505.22	2228.32	1.00		4.00	1C		Add of Pop Health Team	0.30	09/18/2023		08/21/2023	4704.23	122,310.00	
0169	Registered Nurse	Quality Improvement	86,405.74	2060.07	0.99		4.00	1C		Add of Pop Health Team	1.00	04/01/1974		08/17/2023	5980.77	155,500.00	
1007	ADMIN SUPPORT	Quality Improvement	46,826.10	1774.02	0.85		25.00	33.00		Add of Pop Health Team	0.26	08/15/2022		00/00/0000	6216.12	161,619.00	
1095	Population Health Specialist	Quality Improvement	46,008.23	2022.67	0.97		25.00	33.00		Add of Pop Health Team	1.00	09/26/2023		00/00/0000	5330.04	138,581.00	
1018	Population Health Specialist	Quality Improvement	46,184.70	2161.21	1.00		25.00	33.00		Add of Pop Health Team	1.00	09/19/2022		09/18/2023	6844.23	177,950.00	
0958	Controller	Finance	107,772.75	2080	1.00		25.00	34.00		Expand of Finance		10/11/2021		00/00/0000	0	93,600.00	
0114	Human Resources Manager	Human Resources	75,818.09	2080	1.00		25.00	33.00		Expand of HR		07/11/1990		00/00/0000	4240.38	110,250.00	

Additional Cost Report Information

- Visits

Count of UniqueID	Column Labels			
Row Labels	1. Medical	2. Dental	3. Behavioral Health	Gran
1. CCC MCD	12270	7173	1556	
2. Open Card MCD	641	56	68	
3. Medicare	5958	1	344	
4. Commercial	11328	1422	973	
5. Other	817	2211	65	
Grand Total	**31014**	**10863**	**3006**	

Row Lables	Distinct Count of E/M	On-Site	Off-Site	Total
1	Physicians	13,257	111	13,368
2	MidLevels	41,213	186	41,399
4	Nurses	2,002	0	2,002
10	Dentists	14,015	129	14,144
11	Hygienist	5,815	268	6,083
16	LCSW	1,563	37	1,600
17	Psych NPs	1,333	16	1,349
23	SUD	264		264
Grand Total		**79,462**	**747**	**80,209**

Alternative Payment & Advanced Care Model (APCM) Split

- Identifies eligible medical costs only (carve outs – maternity care, behavioral health, dental).
- Validated by payer mix.
- Updates the per-member, per-month (PMPM) payment rate with applicable CiS costs.

CiS Costs	a	$7,787,599	Incremental costs from PPS CiS worksheet
CCO APCM %	b	17.32%	From APCM Split Worksheet
CCO APCM % with transformed visit adjustment	c	18.18%	From APCM Split Worksheet
APCM Wrap Cap portion of incremental costs	d	$1,415,532	
Member Months	e	22,772	OHA Validated with 820 data
Incremental Cost PMPM	f	$62.16	=d/e = APCM costs divided by member months
MEI Factor	g	3.50%	MEI for most recent year
Trended Incremental Cost	h	$64.34	= (f *(1+g)) = Cost PMPM times MEI
Current APCM Rate	i	$97.19	Current Wrap Cap APCM rate
APCM Wrap Cap Rate From Incremental Methodology	j	***$161.53***	=h+i = Incremental Cost PMPM + APCM Rate
		165.89	

CiS Costs	a	$7,787,599	Incremental costs from PPS CiS worksheet
Open Card APCM %	b	0.69%	From APCM Split Worksheet
CCO APCM % with transformed visit adjustment	c	0.72%	From APCM Split Worksheet
Open Card portion of incremental costs	d	$56,241	
Member Months	e	1,429	OHA Validated with 820 data
Incremental Cost PMPM	f	$39.36	=d/e = APCM costs divided by member months
MEI Factor	g	3.50%	MEI for most recent year
Trended Incremental Cost	h	$40.73	= (f *(1+g)) = Cost PMPM times MEI
Current APCM Open Card Rate	i	$94.58	Current Wrap Cap APCM rate
APCM Open Card Rate From Incremental Methodology	j	***$135.31***	=h+i = Incremental Cost PMPM + APCM Rate
		138.96	

Common Issues

Narrative is unclear

- "Increasing complex patient base" – How has the service delivery model changed?
- New Admin/Support positions – How do these new positions impact patient care?

Cost Report

- Appears as a rebasing effort.
- Does not clearly identify original costs trended forward by MEI.
- All payers must be included per Social Security Act §1861(v)(1)(A).
- Current staff transition to new higher paying roll – what was the previous salary?
- Dental visits – CCO data issues, include dental provider Medicaid ID/ NPI to validate visits.

Growth vs CiS

- Both the narrative and cost report must clearly identify qualifying events that are changes to the clinic/ health center and not a product of growth.

APCM

- APCM 3131 roster not regularly uploaded.
- Difficulty validating member months.



Questions?

Adrienne.Cooke@oha.Oregon.gov

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Medicaid Division
Federally Qualified Health Centers and Rural Health Clinics Program
500 Summer St NE E 35
Salem, OR 97301
Fax: 503-373-7689
www.oregon.gov/oha/hsd/ohp/pages/policy-fqhc-rhc.aspx

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