



## **Non-Engaged Patient Closure Re-implementation Process Drafted March 2020, Updated December 2020**

### **Policy basics**

OHA will close APCM enrollments for patients who have not received a visit or a Care STEP within an eight quarter rolling lookback period. The purpose of this policy is to make sure APCM health centers engage with patients on a regular basis. This policy was approved by OHA and APCM health center leadership in late 2017 and is part of the Access Quadrant of the APCM Accountability Plan.

### **Review of the first implementation cycle in mid-2019**

A sub-group of six APCM health centers met with OPCA and OHA to test the process ahead of the official policy roll-out. The first test took place in late 2018 through early 2019, and the second test took place in April 2019. Health centers received their first NECRs from OHA in June 2019. Soon after the Non-Engaged Closure Reports (NECR) were implemented, OHA ran into unanticipated issues and decided to pause the NECR. The pause to the NECR had been extended to Q2\_2021, and is now further extended to Q4\_2021.

### **High-level drafted plan for restarting the NECR**

#### **Q4 2021 tentative re-implementation timeline**

- OPCA and OHA will provide an updated and standardized Care STEPs template by February 2021. (Please note: There will be no changes to the Care STEPs policy, only the reporting template.)
- OPCA and OHA will reconvene a subset of the workgroup by early 2021.
- OPCA will organize technical assistance (TA) for all health centers ahead of implementation in early-mid 2021.
- OPCA and OHA will test out re-implementation with the reconvened workgroup in Q3\_2021.
- October 31st, 2021: Q3 Care STEPs reports are due to OHA, along with other quarterly reports.
- November or early December 2021:
  - OHA will prepare and send NECRs to health centers.
  - Health centers will have the opportunity to appeal individual patient closures.
- Following opportunity for appeals, payment recoupments for closed patients will be taken only back to the beginning of Q4\_2021.

#### **Lookback periods and patients affected**

For the first quarter of re-implementation (Q4\_2021), the NECR will consider all patients on APCM lists within the prior eight quarters. The NECR will only look for engagement within the past eight quarters and payment recoupments for closed patients will be taken only back to the beginning of Q4\_2021.

The first cycle of NECR in mid-2019 considered all patients that were established since the beginning of the program. Therefore, the lookback period will always be a rolling eight quarters and the patients affected should be fewer than within the first implementation in mid-2019.

#### **Payment recoupments**

Payment recoupments for closed patients will only be collected back to the beginning of the reported quarter. Recoupments due to NECR are reflected within the monthly capitation cycle.