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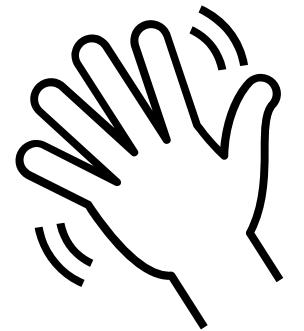
In Lieu of Services (ILOS) Office Hour

Introductions

Oregon Health Authority (OHA) ILOS team

Mary Durrant (she/her), Claims and Encounter Data Services

Dave Inbody (he/him), CCO Operations



Today's agenda

- Background and overview of the ILOS supervision option
- Implementation updates
- Questions and open discussion
- Forthcoming OHA guidance
- Contact information



ILOS supervision option

ILOS definition

- **In lieu of services (ILOS)** are medically appropriate and cost-effective substitutes for covered benefits under the state Medicaid plan, the Oregon Health Plan (OHP).
- ILOS can be used as an immediate or longer-term substitute, or when it's expected to reduce or prevent the need for OHP-covered benefits in the future.
- ILOS available for coordinated care organization (CCO) implementation are included in CCO contracts with OHA.
- CCOs are not required to offer ILOS to members; CCO members are never required to receive the ILOS.
- A CCO can offer ILOS "a la carte," for example, it may offer one of the 13 existing ILOS, and another CCO might offer five of the 13 ILOS.

Overview: ILOS supervision option

- ILOS offers an optional supervision flexibility CCOs can use to support provision of **community health worker (CHW)** and **peer services** in community-based, non-clinical settings.
- Key elements of the flexibility:
 - A CHW or peer providing an ILOS may work under a **non-licensed health care professional (LHCP)** supervisor who meets certain qualifications, based off current guidance in OARs and by the Traditional Health Worker Commission.
 - A CHW or peer providing an ILOS **may bill under an organization or billing hub**, using the new OHP ILOS provider type.

Background: ILOS supervision option

A limited-duration **Traditional Health Worker (THW) ILOS workgroup** met to advise on this flexibility from October 2023 to August 2024.

- Composition: Consistent representatives from the THW Commission Executive Committee (including CCO THW liaisons) and OHA ILOS team, with ORPRN facilitating

Outcome:

- The workgroup ultimately advised OHA to continue offering the supervision option, with the revised language currently in the ILOS Program Overview guidance document (pg. 9, 13).*
- The supervision flexibility is offered in two of the 13 existing Oregon ILOS:
 - **CHW services ILOS, and**
 - **Peer and Qualified Mental Health Associate (QMHA) services ILOS.**
- Reminder: ILOS is optional to CCOs, as is the supervision flexibility. For example, a CCO could offer the Peer & QMHA ILOS and not offer the supervision flexibility within it.

*ILOS Program Overview- <https://www.oregon.gov/oha/HSD/OHP/CCO/ILOS%20Program%20Overview.pdf>

ILOS that feature the supervision option (1 of 2)

Peer and Qualified Mental Health Associate services- alternative setting

Peers providing this ILOS:

1. May work and bill under the supervision of a licensed health care professional, including physicians, certified nurse practitioners, physician assistants, dentists, Dental hygienists with an Expanded Practice Permit, Ph.D. Psychologists, PsyD Psychologists, Speech Language Pathologists, LCSW Social Workers and Licensed Professional Counselors, OR
2. **May bill under an organization or billing hub using the OHA ILOS enrolled provider type (1C), and work under a Peer-Delivered Services Supervisor**, who is a qualified program staff with at least one year of experience as a Peer Support Specialist (PSS) or Peer Wellness Specialist (PWS) in behavioral health services, who is responsible for evaluating and guiding PSS and PWS program staff in the delivery of peer-delivered services and supports, as defined in [OAR 309-018-0105](#), clause 106.

ILOS that feature the supervision option (2 of 2)

Community Health Worker services- alternative setting

CHWs providing this ILOS:

1. May work and bill under the supervision of a licensed health care professional, including physicians, certified nurse practitioners, physician assistants, dentists, Dental hygienists with an Expanded Practice Permit, Ph.D. Psychologists, PsyD Psychologists, Speech Language Pathologists, LCSW Social Workers and Licensed Professional Counselors, OR
2. **May bill under an organization or billing hub using an enrolled OHP provider type (1C), and work under the supervision of a supervisor who:** (a) upholds the Traditional Health Worker (THW) Standards of Professional Conduct, as defined in [OAR 950-060-0080](#), and (b) aligns with the recommended qualities, skills, knowledge and standards of excellent practice of a THW supervisor, as outlined in the current THW Commission [guidance document](#).



Implementation updates



ILOS provider type

ILOS provider type

The **ILOS provider type** required to use this supervision flexibility is now built in the Medicaid Management Information System (MMIS).

- ILOS Provider type: 1C.
- Specialties will be created related to applicable ILOS adopted by CCOs.
- This provider type is to be used in ILOS encounter data only, not any regular encounter data.
- Enrollment to provider type 1C is completed through regular Encounter Only provider enrollment process.



Implementation needs

Request for CCO feedback

- What tools or assurances do you need to implement the supervision option?
- What does your CCO need to feel comfortable in the relationship with ILOS providers in this novel approach?
- Do you have different needs or concerns to implement the Peer/QMHA ILOS versus the CHW ILOS?
- What is holding you back from implementing these two ILOS?
- What do you need to move forward to ensure ILOS providers meet the supervisory requirement?
- What guidance would be helpful from OHA to successfully implement the supervision option?

Additional forthcoming OHA guidance

- CCOs can expect forthcoming ILOS guidance from OHA:
 - Guidance on ILOS provider type and specialties: Published on the OHA Encounter Data webpage
 - Updated ILOS guidance documents published to the OHA ILOS webpage and CCO contracts page

Resources and contact information

- To learn more about ILOS, see the [OHA ILOS webpage](#)
- OHA ILOS team: ILOS.info@odhsoha.oregon.gov
- ILOS billing support:
Encounter.DataSupport@odhsoha.oregon.gov



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Thank you