
In Lieu of Services (ILOS) Office Hour

May 30, 2024



Introductions

Oregon Rural Practice-Based Research Network (ORPRN)

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Purpose of today's office hour:

- Share key updates to ILOS guidance documents
- Provide space for CCOs to ask OHA questions about ILOS

Welcome, CCOs!

- Which ILOS is your CCO offering?
- Which ILOS is your CCO interested in or would like to explore further?



Updated ILOS guidance documents

- **ILOS Program Overview**
 - Resource for CCO staff, community partners and others to **learn the basics of ILOS**
- **ILOS Billing and Reporting Guide**
 - Resource for CCO staff that outlines the **process of billing and reporting ILOS**
- **ILOS Frequently Asked Questions (FAQ)**
 - Resource primarily for CCO staff that provides **answers to FAQs**

Key guidance updates

In lieu of services (ILOS) definition

- **Medically appropriate** and **cost-effective substitutes** for covered benefits under Oregon’s Medicaid state plan, Oregon Health Plan (OHP)
- Substitutes OHP-covered benefits usually by offering an alternative service, alternative setting, or alternative provider

Covered benefit	ILOS
Service	Medically appropriate and cost-effective alternative service
Service offered in a clinical setting	Medically appropriate and cost-effective service offered in an alternative setting (where the service isn’t already covered)
Service offered by a clinician or clinic staff	Medically appropriate and cost-effective service offered by an alternative provider

ILOS definition

- Can also provide an immediate or longer-term substitute to OHP covered benefits, **for example:**

Substitute type	ILOS
Immediate substitute	A member eligible to participate in a diabetes self-management program can receive the covered benefit offered in-person in a clinical setting or participate online (alternative setting) through ILOS.
Longer-term substitute	A member is offered medically tailored meals through ILOS* to support better health outcomes and access to care in communities, which could prevent or delay their need for care in nursing facilities in the future .

*This example is provided by Centers for Medicaid & Medicare Services (CMS). Medically tailored meals is not currently an approved Oregon ILOS available to CCOs.

Learn more: ILOS FAQ #1-#4; ILOS Program Overview pg. 3-4; [SMD #: 23-001](#)

Approved Oregon ILOS

- There are **currently nine ILOS available** to CCOs for implementation in 2024.
- The ILOS Program Overview guidance document includes:
 - Service details for each ILOS, including 2024 ILOS
 - Additional background information of each ILOS

Question for CCOs:

Is your CCO interested in either of the ILOS added in 2024?

ILOS added in 2024

- HIV/STI testing and treatment services—alternative setting
- Traditional health worker services for HIV/STI disease management—alternative setting

Updated ILOS supervision option language

- Community Health Worker (CHW) services ILOS and Peer and Qualified Mental Health Associate (QMHA) services ILOS offer a **supervision option** to support these services in community-based settings.
- A Traditional Health Worker ILOS workgroup convened from November 2023- April 2024 reviewed and **revised this supervision option language.**

Updated supervision language: CHW services ILOS

“CHWs providing this ILOS:

- 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
- May bill under an organization or billing hub using a forthcoming enrolled OHP provider type, and work under the supervision of a supervisor who: (a) upholds the Traditional Health Worker 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](#). CCOs will attest to these minimum supervisory requirements via an attestation process."

Updated supervision language: Peer & QMHA services ILOS

“Peers providing this ILOS:

- 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
- May bill under an organization or billing hub using a forthcoming enrolled OHP provider type, 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.”

Updated supervision option language

- After this supervision language revision, there are implementation details currently in development:
 - CCO attestation process
 - Provider type for organizations and hubs to enroll and bill under is being developed by OHA Claims and Encounter Data Unit

Question for CCOs:

How would you like to be notified when these details are finalized?

Questions?

Next steps

- Based on the information shared today, what are your CCO's next steps?
- What support do you need?
- What questions can OHA/ORPRN work on answering?

Guidance documents

ILOS guidance documents are available for your reference on the [OHA ILOS webpage](#):

- [ILOS Program Overview](#)
- [ILOS Billing and Reporting Guide](#)
- [ILOS Frequently Asked Questions](#)

Contact

- For assistance with case-specific questions to enable ILOS reimbursement, contact **OHA's Encounter Data Liaisons** (Encounter.DataSupport@odhsoha.oregon.gov)
- **One-on-one technical assistance is available to CCOs** interested in implementing ILOS. Contact:
 - Bethany Linscott-Lowe (lowbe@ohsu.edu) or Hannah Bryan (bryanh@ohsu.edu)