

Traditional health worker (THW) billing guidance for community-based organizations

The Oregon Health Authority (OHA) Transformation Center, in partnership with the [OHA THW Program](#) and the [OHA Medicaid Division](#), has released two new guidance documents to support THW billing and payment. These documents and materials from recent THW billing guidance webinars are available on the [THW billing and payment webpage](#).

- [THW Billing Guide](#) – Clarifies Medicaid THW billing options, including supervision requirements for different provider types/provider arrangements, alternative or community settings, available billing codes, and information on how requirements differ by THW type. Includes options beyond standard covered services, like in lieu of services (ILOS) and health-related services (HRS).
- [Sustainable THW Program Toolkit](#) – Includes sample job descriptions, a survey of salaries in different organizations, research on rates, sample contracts or payment models, and ideas for making payment sustainable beyond Medicaid reimbursement.

Below are answers to questions that came up during the webinar on May 28, 2025.

Questions & Answers

- **Question:** Is a THW required to have a high school diploma?
 - **Answer:** THWs are required to have a GED or high school diploma.
- **Question:** Would a Registered Nurse or family nurse practitioner (FNP) qualify as supervisor?
 - **Answer:** An FNP does qualify as a supervisor, but an RN does not. Clinical supervisors must be licensed health care providers (LHCP). This includes Physicians, Nurse Practitioners, Physician Associate, Dentists, Dental Hygienists with an expanded practice permit, Ph.D. Psychologists, PsyD Psychologists, Licensed Clinical Social Workers, and Licensed Professional Counselors. Clinical settings where an RN is working under the supervision of an LHCP, the THW would be supervised by the LHCP.
- **Question:** Can someone apply for an NPI number or apply to be a Medicaid provider before they have completed their THW training/certification?
 - **Answer:** You can get an NPI number and apply to be a Medicaid provider prior to completion of THW training. To do so, you must know the taxonomy for your specialty. Information on THW trainings is at <https://www.oregon.gov/oha/EI/Pages/THW-Training-Programs.aspx>

- **Question:** Are all Oregon CCO's represented at today's webinar?
 - **Answer:** CCOs present on the webinar:
 - Lana McGregor, THW Liaison for AllCare, lane.mcgregor@allcarehealth.com. AllCare CCO has a similar model to Pacific Source using HRS Flex and CBI funding
 - Emily Zeller- THW Liaison w/ PacificSource for Central Oregon and Lane Counties. Emily.zeller@pacificsource.com
 - Lamar Tillman, THW Liaison for Trillium CCO in the Tri County supporting (Washington, Clackamas and Multnomah) Lamar.tillman@trilliumchp.com
 - Kristinia Rogers, Trillium CCO, Lane and small portion of Douglas County Region THW Liaison krogers@trilliumchp.com
 - Umpqua Health Alliance THW Liaison abrown@umpquahealth.com
 - Each CCO is required to have a THW Liaison. Contact your CCO to be connected to that staff person.
- **Question:** Are other Oregon CCO's providing similar services for CBOs with THWs as PacificSource?
 - **Answer:** CCO THW programs vary. The documents posted on <https://www.oregon.gov/oha/HPA/dsi-tc/Pages/Traditional-Health-Worker-Billing-and-Payment.aspx> include case studies from some CCOs. AllCare CCO has a similar model to Pacific Source using HRS Flex and CBI funding.
- **Question:** Do I understand an organization cannot have any billable services to qualify for the PacificSource programmatic payment?
 - **Answer:** The PacificSource programmatic payment model is for community-based organizations who do not bill or submit claims. Clinics with integrated THWs can bill for those services.
- **Question:** Is PacificSource seeking new contractors for the alternative payment model?
 - **Answer:** Yes, feel free to reach out thwinfo@pacificsource.com to be connected to the right person depending on your CCO region.
- **Question:** Can an FQHC that uses the APCM payment model bill for CHW services or are those services already included in the APCM?
 - **Answer:** No. The APCM PMPM enables health centers to expand their services by making the hire of a THW/CHW possible (i.e. as transitioned to care team model and built out the team to fit the needs of the patient, hiring a THW was possible due to the set PMPM of known revenue).
- **Question:** Are CCO's required by OHA to share their specific payment models for THW's?

- **Answer:** Yes, annually. They are posted at <https://www.oregon.gov/oha/EI/Pages/CCO-Traditional-Health-Worker-Deliverables.aspx>
- **Question:** I'm wondering if there is any specific guidance around hourly pay rates for CHWs. In particular, I'm curious about the pay rate increase for a CHW who gets certified after going through the CHW training while employed by our CBO. Are there any best practices or suggestions for the pay rate increase once an employee becomes CHW certified?
 - **Answer:** The document does not include specific payment suggestions. Fee-for-service rates are included in the document as ideas. Columbia Gorge Health Council tries to raise up the profession and gives points for lived experience, which is given more points than education. The Oregon Community Health Worker Association and other THW professional organizations may have additional guidance.
- **Question:** Can you include where, in writing, postpartum doulas can be funded with HRSN funds?
 - **Answer:** HRSN funds cannot be used to support postpartum doulas. HRS funds can be used for this. Details are at <https://www.oregon.gov/oha/HPA/dsi-tc/Documents/Health-Related-Services-Guide-THWs.pdf>. Iris Bicksler, Oregon Doula Association, is happy to talk more about this iris@mshconsultingnw.com.
- **Question:** Can local public health agencies contract to provide CHW services with their CCO?
 - **Answer:** Yes, local public health agencies can contract with CCOs to provide CHW services to members.