

Traditional health worker (THW) billing guidance for CCOs

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 (fee-for-service) reimbursement. The toolkit is a resource aimed to inform of different payment strategies and information used by some of Oregon's coordinated care organizations.

Below are answers to questions that came up during the webinar on May 22, 2025.

Questions & Answers

Question: Are THW services already included in PPS rate for FQHC's?

- **Answer:** In general, yes. The list of codes excluded from encounter/PPS rates can be found at <https://www.oregon.gov/oha/HSD/OHP/Tools/Procedures%20excluded%20from%20Prospective%20Payment%20System%20encounter%20reimbursement.pdf>.

Question: What is DMAP?

- **Answer:** DMAP means Medicaid; however, the term is no longer current. The Medicaid fee schedule can be found at <https://www.oregon.gov/oha/HSD/OHP/Pages/Fee-Schedule.aspx>

Question: What Primary Source Verifications are used to verify OHA certification?

- **Answer:** THW certification verification is done via the [THW Registry](#). [The THW registry may not show all persons with current certification since it is optional for THWs to share this information. An inquiry can be sent directly to OHA provider services unit or with a completed release of information and authorization from the THW provider, an inquiry may be sent to OHA's THW Program at \[thw.program@odhsoha.oregon.gov\]\(mailto:thw.program@odhsoha.oregon.gov\)](#)

Question: Where is the document that outlines supervision requirements?

- **Answer:** The Best and Promising Practices for Traditional Health Workers document includes details about supervision:
<https://www.oregon.gov/oha/EI/THW%20Documents/Updated%20Supervision%20Recommendations%201%20282%29.pdf>

Question: How is this THW billing through primary care related to pre-treatment billing codes in behavioral health? And how can we braid more of both primary care and behavioral health work (such as having more of the same billing codes for both, etc.) and ensure that location of service (e.g. on the street or in a camp) be covered?

- **Answer:** The [THW Billing Guidance document](#) includes information about billing codes for each THW type. There may be some options through in lieu of services (ILOS). Please reach out to the OHA THW program (THW.program@odhsoha.oregon.gov) or your CCO's THW Liaison for more specific information.

Question: Is anyone here a FQHC that uses the APCM payment model and bills and gets reimbursed for CHW services?

- **Answer:** FQHCs participating in APCM cannot bill separately for CHW services. The APCM PMPM payments enable 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: Has anyone been able to utilize these codes and processes for folks that might not yet be fully registered with a clinic to be able to use billing? Can these codes be used for folks that might not have completed full registration in FQHC or other CBO? Focusing on proactive outreach to address elevated behavioral health acuity that might be a barrier to engaging in traditional service models?

- **Answer:** In most cases, THWs must work with an organization (clinic, hospital, community-based organization, etc.) that is registered with OHA to bill for services. See the [THW billing guidance document](#) for more information on how to bill for services. A billing hub may be an option for individual THWs to bill for services, see an example in the [sustainable THW payment models document](#) and get in touch with your CCO to learn more about options.

Question: We have a CMHP that asked if an outpatient SUD peer can go to their SUD residential program to provide peer services to members from other counties to link them with peers in their county. The debate is whether this would be "double dipping" if peer services are included in the SUD residential bundled rate. Thoughts?

- **Answer:** Peers can provide services in multiple counties. A service can be billed separately if it is not related to the bundled rate for treatment. This is not "double dipping." Information about billing for peers can be found at <https://www.oregon.gov/oha/HSD/OHP/Tools/Peer-Support-Billing-Guide.pdf>

Question: Hannah mentioned direct outreach with newsletters etc. to THWs on the registry who identified working in one of your counties in Eastern Oregon but are not contracted. Very cool! Can you say more about that and what you do? How do we sign up for EOCCO's THW meetings and subscribe to the newsletter?

- **Answer:** On a quarterly basis, EOCCO downloads the THW registry list and filters by county. If a THW has an email associated with their certification, they are added to the listserv. They can unsubscribe at any time. Archived newsletters are available on our website if you'd like to take a look (under the Traditional Health Workers button): [EOCCO provider - education](#). To be added to the listserv please send an email to THW@eoocco.com.

Question: Are billing modifiers being developed and adapted to meet the regional needs of OHP THW services billing for all THW providers, both contracted and hired by individual CCOs? My question includes modifiers needed/suggested for providing in-home 1915i PSS/PWS specific services.

- **Answer:** Not at this time

Question: For those already billing THW services (like Good Shepherd), are there options to bill for services provided for a patient that does not have Medicare or Medicaid?

- **Answer:** Good Shepherd is not currently billing other insurances but are looking into options for this.
- **Answer:** [Oregon Community Health Workers Association](#) (ORCHWA) is exploring billing beyond Medicare or Medicaid for CHW programs.

Question: Where do you find the specialty trainings for the CHW's?

- **Answer:** All OHA-approved trainings can be found on the [THW Program webpage](#).

Question: Many CBOs do not have EHRs or typical claims pathways. Has EOCCO found a way to automate your THW billing process? Can we hear more about your THW claims tracking and billing processes?

- **Answer:** EOCCO has created a self-administered billing hub that contracted THWs can use to bill for services, however, few CBOs have utilized this pathway due to billing requirements of clinical diagnosis codes and licensed healthcare professional oversight. Our billing hub and system is not fully automated, but we are working to reduce the administrative complexities of THW billing, providing THWs with claim codes to be able to track their billed claims in real time. THWs based in CBOs who are billing for their work are largely using standard CMS-1500 forms.

To expand CBO billing, EOCCO is evaluating how we can utilize in-lieu-of-services to support our CBOs. Each CCO does have different ways of supporting CBOs, and many provide access to electronic billing processes when joining their network. Some organizations can also act as billing hubs for THWs, although EOCCO does not have any additional hubs in our service area at the moment.

Question: Can we ask questions about the THW CPT codes that were selected for the Social emotional metric? I'm wondering if your CCO has met with OHA to clarify the service descriptions for this specific metric. Some of the verbiage does not feel applicable and we'd love to know if you already have done work in this area.

- **Answer:** There is a billing guidance document specifically for the social emotional metric, available online here: <https://www.oregon.gov/oha/HPA/dsi-tc/Documents/Social-Emotional-Interventions-for-1-5-Metric-Coding-and-Billing-Guidance.pdf>

Question: Who can we reach out to for specific billing questions if not answered in the documents?

- **Answer:** OHA contact for THW payment, Summer Boslaugh
summer.h.boslaugh@oha.oregon.gov
OHA contact for all other THW questions THW.program@odhsoha.oregon.gov
- **Answer:** Your CCO's THW Liaison may also be able to help. Each CCO is required to have a THW Liaison. Contact your CCO to be connected to that staff person.