

Memorandum

To: Coordinated Care Organizations (CCOs), Providers, and Traditional Health Workers

From: Holly Heiberg, Medicaid Policy Director
David Inbody, CCO Operations Director

Date: July 22, 2025

Subject: Billing for Peer-Delivered Services Update

OHA issued a [memo on May 12, 2025](#) addressing billing Medicaid for peer-delivered services in settings that do not require a Certificate of Approval (COA). In June, CCOs and Traditional Health Workers (THWs) provided more feedback about current understanding and interpretation of policies around COA requirements and peers rendering services in various clinical settings. CCOs and providers have shared examples that demonstrate the lack of clarity on the policy, and subsequently, the billing pathways needed for peer-delivered services.

OHA seeks to improve access to peer-delivered services, the integration of THW-peer providers and entities providing peer services in Oregon. Within their defined scope of practice and under appropriate supervision, peer support specialists are uniquely trained and qualified to deliver behavioral health services that emphasize recovery, wellness, and prevention.

Based on above mentioned feedback, OHA has decided to take more time for partner and community engagement to develop the peer billing guidance: OHA will provide more clarity about the peer role as part of primary care and other settings by September 2025.

What is coming up next?

OHA plans to convene a series of workgroups to develop policy and billing guidance for Traditional Health Workers beginning with peers in non-behavioral health settings and clinics, such as primary care, hospitals, and other settings that do not require a COA. Participants will include CCOs, providers, clinicians, THWs, peers, and OHP members. This workgroup will convene in Summer 2025 and collaborate to resolve outstanding issues. At the conclusion, OHA will provide new guidance and clarity for partners.

Questions?

If you are interested in participating in the workgroup or would like to provide comment, please email Rusha.Grinstead@oha.oregon.gov. Thank you for the services you provide to our members.