
In Lieu of Services (ILOS) Billing Office Hours

October 30, 2023



ILOS Billing Office Hours

Hannah Bryan (she/her)

Oregon Rural Practice-Based Research Network
(ORPRN)

Mary Durrant (she/her)

Claims and Encounter Data Services Unit, Oregon
Health Authority (OHA)

Dave Inbody (he/him)

CCO Operations, Health Systems Division, OHA

Agenda

- Definition
- Billing pathways
- Billing codes
- Provider requirements
- Q&A

In lieu of services (ILOS)

In lieu of services (ILOS) are medically appropriate and cost-effective **substitutes** for covered services or settings under the State Medicaid plan, the Oregon Health Plan.

- Coordinated care organizations (CCOs) are not required to offer ILOS to members.
- CCO members are not required to use the alternative service or setting.

Centers for Medicare & Medicaid Services' (CMS) ILOS requirements outlined in 42 CFR 438.3(e)(2).

Billing pathways

- If the ILOS provider **has billing infrastructure**, ILOS is billed through standard Medicaid claims
- If the ILOS provider is **unable to submit a claim**, CCOs have **the option** to:
 - Collect a limited dataset from the ILOS provider
 - Add remaining data needed to create and submit a valid claim

Reduced dataset

- This **optional** billing pathway was identified to reduce the administrative process of ILOS billing for community-based organizations without billing infrastructure
- Can be collected from ILOS providers electronically, paper, etc.
 - *CCOs are encouraged to work with providers to tailor how ILOS data is collected*
- If pursued, CCOs would still need to create a compliant 837 file that meets the national standard X12 transactions and code sets requirements

Reduced dataset elements

- National Provider Identifier (NPI) of billing & rendering provider, except for atypical providers
- Name & Medicaid ID number of member
- Valid diagnosis code(s), procedure code(s) and modifier(s)
- Billed amount for service
- Coordinated care organization (CCO) allowed and paid amounts for service

Billing codes

- Any procedure code that is valid on the date of service and is an accurate representation of the ILOS service provided may be used
- OHA has suggested procedure codes & modifiers for 2023 Oregon ILOS in the ILOS billing guidance document
- All ILOS claims must include the ILOS-specific modifier "V4" for tracking purposes

ILOS provider requirements

National Provider Identifier (NPI)

- ILOS **rendering (service) providers** must have a valid and enrolled National Provider Identifier (NPI)
- ILOS **billing providers** must either obtain a valid NPI or be enrolled as an atypical provider. Atypical providers are not required to have an NPI.

ILOS provider requirements

Division of Medical Assistance Programs identification (DMAP ID)

- **Every provider** on a claim (rendering and billing providers) must be known to MMIS and have a Medicaid/DMAP ID #.
- As of October 2023:
 - Fee-for-service enrollments are typically processed within ~three months
 - Encounter-only enrollments submitted by a CCO are typically processed within one to three days

Question & answer

Design schedule

<p>Pre-design sessions</p>	<p>Idea generation & prioritization Review ILOS ideas already collected, share and collect new ideas, discuss feasibility and prioritize which ILOS to move forward</p>	<p>Who: CCO staff and community partners</p> <p>When: November 7, 2023 at 11 a.m. November 14, 2023 at 2 p.m.</p>
<p>Design sessions</p>	<p>Detail specification Determine specifics of each service. One session per each ILOS proposed, up to 4 sessions.</p>	<p>Who: all invested parties</p> <p>When:</p> <ul style="list-style-type: none"> • November 29, 2023, 10-11:30 a.m. • December 6, 2023, 3:30-5 p.m. • December 8, 2023, 10:30 a.m.-noon • December 11, 2023, 2-3:30 p.m.
<p>How to participate</p>	<p>Where: Virtual Zoom meetings. Registration is required to attend. Click on dates to register for individual sessions.</p>	

Guidance documents

ILOS guidance documents:

- [List of 2023 Oregon In Lieu Of Services](#)
- [Comparing CCO Spending Initiatives - Updated September 2023](#)
- [ILOS Billing Guide - Updated August 2023](#)

Contact

Email OHA's Encounter Data Liaisons

(Encounter.DataSupport@odhsoha.oregon.gov) for assistance with case-specific questions to enable ILOS reimbursement.

- **One-on-one TA is available to CCOs** interested in implementing ILOS.
 - **Contact:** Bethany Linscott-Lowe (lowbe@ohsu.edu)
or Hannah Bryan (bryanh@ohsu.edu)