
In Lieu Of Services (ILOS): Guidance Updates, CCO Experience & Future Opportunities

Dave Inbody (he/him)
Coordinated Care Organization (CCO) Operations Director
Health Systems Division, Oregon Health Authority



Agenda

- 2023 ILOS federal guidance
- 2023 Oregon ILOS
- Opportunities and vision for Oregon
- CCO sharing: Umpqua Health Alliance
- Questions and discussion
- Upcoming technical assistance

In Lieu Of Services (ILOS)

- In Lieu of Services (ILOS) are **cost-effective** and **medically-appropriate substitutes** for covered services or settings under the State Medicaid plan.
- ILOS must meet Centers for Medicare & Medicaid Services (CMS) requirements for [42 CFR 438.3\(e\)\(2\)](#), including:
 - The member is not required by the CCO to use the alternative service or setting.
 - The approved ILOS are included in the CCO's member handbook.
 - The utilization and actual cost of ILOS are taken into account in developing the medical component of the CCO's capitation rates.

2023 ILOS federal guidance – moving upstream

Per CMS, ILOS can be used as:

- **An immediate or longer-term substitute** for State plan-covered services or settings.
- **A way to reduce or prevent future need** to utilize State plan-covered services or settings.

See CMS' 2023 guidance on ILOS:

<https://www.medicaid.gov/sites/default/files/2023-01/smd23001.pdf>

2023 ILOS federal guidance

Per CMS, ILOS can be used to:

- **Reduce health disparities**
- **Address unmet health-related social needs (HRSNs)**
- **Strengthen access to care** by expanding settings options

See CMS' 2023 guidance on ILOS:

<https://www.medicaid.gov/sites/default/files/2023-01/smd23001.pdf>

Potential ILOS: longer-term substitute addressing health-related social needs

ILOS example*: **medically tailored meals** offered to a clinically-oriented target population

Rationale:

- May **improve health outcomes and facilitate greater access to care** for home and community-based services through community integration, thereby preventing or delaying member's need for **nursing facility care**

*Not a currently-approved Oregon ILOS

Status update of 2023 Oregon ILOS

- There are currently **seven** ILOS available to CCOs for implementation in 2023.
- Additional ILOS have been proposed and have the potential to be included in 2024 contracts.
 - **HIV and Sexually-Transmitted Infection (STI) testing and treatment services** - alternative setting
 - **Traditional Health Worker services for HIV/STI disease management** - alternative setting

Opportunities and visions for Oregon

- ✓ Provides flexibility to offer services in innovative, **community-centered ways or in non-clinical settings** to meet members where they are
- ✓ Supports **key services**, such as engagement in mental health and substance use treatment or chronic disease self-management
- ✓ Addresses the **social determinants of health and equity** (SDOH-E) for members
- ✓ Connects to the larger vision for **CCO 2.0 and transformation objectives**

Opportunities and visions for Oregon

The recent CMS guidance poses **exciting opportunities** for CCOs and OHA to leverage ILOS to:

- Support Oregon's related efforts, such as the 1115 waiver's **HRSN benefit** and **SDOH screening and referral metric**
- Align with CCOs' **health-related services (HRS)** and **Supporting Health for All through Reinvestment (SHARE)** investments and strategies

Looking to other states

- California's "community supports," like:
 - Housing tenancy and sustaining services
 - Environmental accessibility adaptations
 - Sobering centers
- North Carolina:
 - Behavioral health urgent care
 - Community reintegration support

ILOS design sessions

- OHA is planning a series of **ILOS design sessions**
 - **What:** series of topic-based discussions to develop and propose additional ILOS for CMS approval
 - **Who:** OHA, CCOs and invested parties
 - **When:** Beginning approximately October 2023. Dates will be posted to the OHA ILOS webpage.

Questions?



In Lieu of Services

Kathryn Hart, MPH
Community Engagement Manager

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Implementation Considerations

Program

Considerations in program selection

- Identified on the list of state-approved ILOS for CY 2023
- Expands availability of existing services for rural community
- No DPP or DSME in Douglas County at time of launch
- One contract with one partner could cover two services

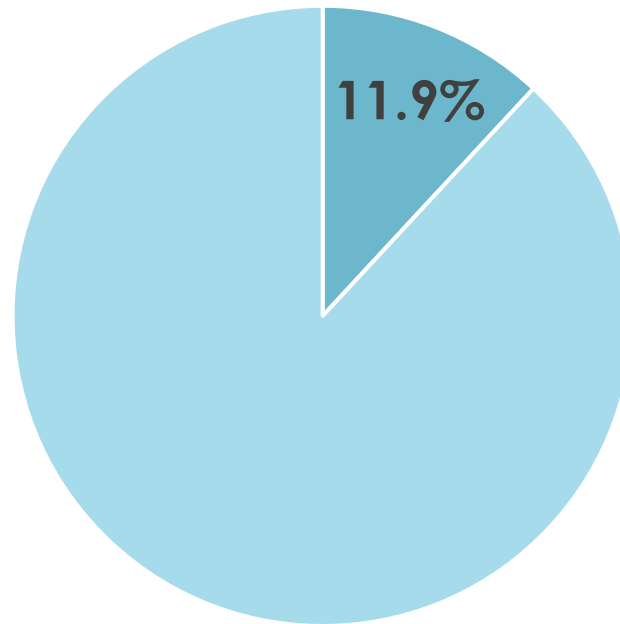
Partner

Considerations in partner selection

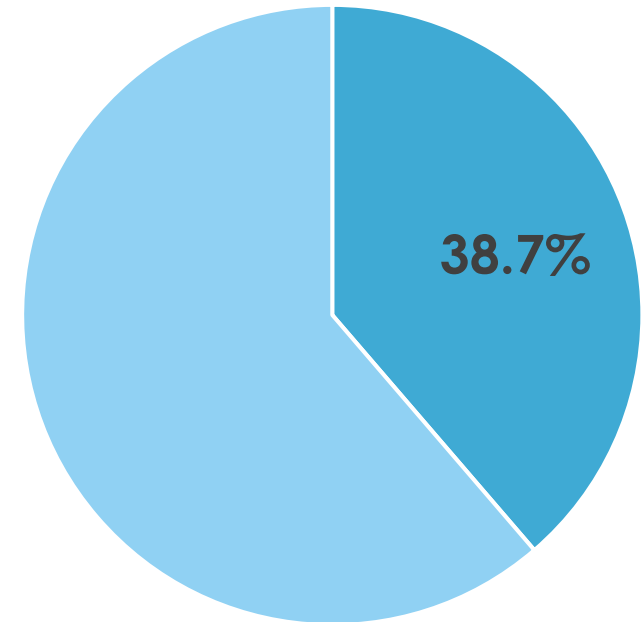
- Several competitive bids for service delivery
- Collaborated with OHA, CCOs, and other agencies
- Selected OWN as the best fit after vetting process

Diabetes Data

Douglas County Adults
with Diabetes (2019-2020)



UHA Members with Poorly
Controlled Diabetes
(2022)





Network hub that supports administration and can offer services in an alternative setting



Rendering providers are Lifestyle Coaches that have gone through specialized training

Oversight by:
Diabetes Care and Education Specialist
Registered Dietician
Nutritionist



Rental of necessary devices (i.e., tablets with data, glucometer, scale, etc.) available through the programs

Who is
OWN?

The Launch

- Contracting with Oregon Wellness Network to launch two online diabetes programs for a total of 52 classes
 - Year One: up to 28 one-hour classes
 - Year Two: up to 24 one-hour classes
 - Ongoing: minimum of three sessions of one-on-one meeting for DSME assessment, nutrition counseling, and follow-up

Diabetes Self-Management

- Programs offered online via OWN with synchronous classes
- Alternative setting
 - No clinics
 - No hospitals
 - No pharmacies
- Claims billed via ILOS modifier
- Services supervised by a qualified health care professional
 - LCSW
 - LPC

Diabetes Self-Management Education and Support (DSME)

Designed for people with diabetes

Component One

- Individualized care planning session with lifestyle coach or diabetes educator

Component Two

- Evidence-based DSM group
- Classes meet weekly
- 2.5 hours for six weeks for 15 hours of instruction

DSME Program Criteria

- Age 18+
 - Exploring expansion to minors
- Type I or Type II Diabetes Diagnosis
 - Gestational diabetes diagnosis does not preclude participation but may not be appropriate care

Adopt additional existing ILOS

- CHWs in alternate settings

Propose new ILOS

- Iris advanced care planning
- Foodsmart telenutrition

Next in ILOS

Questions?

Upcoming technical assistance (TA)

- The **ILOS billing guide** and other guidance documents are posted on the [OHA ILOS webpage](#).
- **ILOS 101 webinar** | Oct. 12, 1-2 p.m.
 - Register via the [OHA ILOS webpage](#)
- **ILOS billing office hours** | Oct. 30, 1-2 p.m.
 - Register via the [OHA ILOS webpage](#)
- **ILOS design sessions** | Fall & winter 2023

One-on-one TA is available to CCOs interested in implementing ILOS.

Contact:

- Bethany Linscott-Lowe (lowbe@ohsu.edu)
- Hannah Bryan (bryanh@ohsu.edu)