

ODM's Maternal and Infant Support Program (MISP) Lactation Consulting Services

June 9, 2021

Stakeholder Engagement Opportunities for MISP

- Please enter your name and organization into the chat
- Speakers will be stopping at key points during today's presentation to answer questions and gather feedback
 - » Please use the chat feature to send questions, or raise your hand and the facilitator will call on you to speak
- Remaining time at the end of the slide deck discussion will be dedicated to additional thoughts and questions
- Questions and feedback can be submitted in writing after the discussion today to MISP@medicaid.ohio.gov

Maternal Infant Support Program (MISP) Umbrella

Phase 1

- PRAF/ROP Reimbursement updates
- Infant Mortality grants to OEI communities

Phase 2

- Group Pregnancy Education services
- Lactation consulting specialty
- Nurse Home Visiting Medicaid reimbursement

Phase 3

- Comprehensive Maternal Care (CMC) program
- Doula services
- Welcome home nurses and providers

Phase 4

- Mom and Baby dyad providers and services
- Extended eligibility for moms with SUD

Context: 2019 Ohio Pregnancy Assessment Survey

The 2019 Ohio Pregnancy Assessment Survey (OPAS) collected 4,276 completed surveys from women at 2 to 6 months following a live birth.

- 42% of women had Medicaid coverage for their prenatal care.
- Approximately 64% of women were breastfeeding at 8 weeks following delivery (including women who were living with their infant, or whose infant was still in the hospital)
- **Breastfeeding was higher among women not enrolled in Medicaid (72%) than women enrolled in Medicaid (52%).**
- **The most commonly cited reasons for discontinuing breastfeeding was that mothers thought they were not producing enough milk, or their milk had dried up (59%).**

ODM intends to make policy changes to better support women with Medicaid as they initiate and continue breastfeeding.

ODM's Current Coverage

How does ODM pay for lactation consulting and lactation supplies today?

- ODM currently covers lactation consultation a couple of ways
 - » E&M codes
 - » Medical nutrition therapy (when performed by a registered dietitian)
- ODM also covers breast pumps, milk storage bags, and human donor milk
- In FY 2019-2020 ODM paid \$7.6M to supply over 53,000 individual electric breast pumps
 - » During this same time ODM provided over 33,000 ounces of human donor milk

How does ODM pay for lactation consulting services now?

CPT/HCPCS Code	Description	Current providers that may render service	Current rate
*E&M services based on ACOG guidelines	Evaluation and Management	Physician, Advanced Practice Registered Nurse (APRN), Physician Assistant (PA)	See Appendix DD to the Medicaid Payment Rule
97802*TH	Lactation counseling by a dietitian, individual	Registered dietitian nutritionist, licensed dietitian	\$20.58
97803*TH	Lactation counseling by a dietitian, individual, subsequent	Registered dietitian nutritionist, licensed dietitian	\$17.97
97804*TH	Lactation counseling by a dietitian, group	Registered dietitian nutritionist, licensed dietitian	\$8.98

How does ODM pay for lactation supplies?

CPT/HCPCS code	Description	Limitations	Current rate
E0602	Manual breast pump	1 every 2 years	\$15.00 each
E0603	Electric breast pump	1 every 5 years	\$202.50 each
E0604	Hospital grade electric pump	90-day rental	\$2.25/day
K1005	Disposable collection and storage bag for breast milk	any size, any type	By-report
T2101	Donor human milk	Medical necessity	\$4.75/ounce

Coverage of lactation consulting services rendered at a FQHC or RHC

- Currently, ODM covers lactation services as an evaluation and management (E&M) service in a FQHC/RHC setting.
 - Allowable billing providers include physicians, physician assistants or an APRNs
 - Payment falls under FQHC/RHC medical services.
- Lactation counseling services provided by an RDN must be billed using the FQHC/RHC's provider type 50.

How does ODM pay for lactation consulting in a hospital setting now?

- Lactation consultation is already covered in the inpatient and outpatient setting.
- There is no separate payment for inpatient lactation consulting services (it's part of the APR-DRG payment) and the EAPG grouper assigns it to 999 which does not receive separate payment.
- ODM currently allows lactation consultants to submit a professional claim if they are practitioners of physician services.

ODM's Proposed Changes

Lactation consulting proposed changes

- ODM intends to expand and improve access to lactation consulting for pregnant and postpartum moms to better support women in our program as they initiate and continue breastfeeding
 - » Higher breastfeeding rates are associated with better infant health, including lower childhood infection rates, and better maternal health, including reduced rates of postpartum depression*
 - » Lactation consultants are associated with higher rates of breastfeeding**
- ODM's goal is to increase the number of women breastfeeding and the duration of breastfeeding by:
 - » Increasing the number and type of providers who can be reimbursed for lactation consulting services
 - » Aligning and streamlining coding and reimbursement for rendering lactation consulting and education services and related lactation supplies

*<https://my.clevelandclinic.org/health/articles/15274-the-benefits-of-breastfeeding-for-baby--for-mom>

**[https://pubmed.ncbi.nlm.nih.gov/26644419/#:~:text=It%20was%20found%20that%20breastfeeding,%5D%2C%201.10%2D1.67\).](https://pubmed.ncbi.nlm.nih.gov/26644419/#:~:text=It%20was%20found%20that%20breastfeeding,%5D%2C%201.10%2D1.67).)

How is ODM proposing to pay for services provided by a lactation consultant in the future?

- The Centers for Medicare and Medicaid Services (CMS) released guidance to state Medicaid programs in 2012 regarding coverage for lactation services.
 - » States may include lactation services as separately reimbursed pregnancy-related services.
 - » States may use multiple Medicaid coverage categories to reimburse lactation services
- ODM is relying on the 2012 guidance as we consider policy changes to cover additional lactation consulting services. ODM initiated conversations with CMS regarding potential policy changes.

How is ODM proposing to pay for services provided by a lactation consultant in the future?

- ODM is exploring coverage for services rendered by non-physician/unlicensed providers who work under the supervision of a licensed practitioner, or are a licensed practitioner themselves. ODM is soliciting feedback regarding potential coverage of services rendered by individuals who hold the following types of certifications/education:
 - » IBCLC – International Board-Certified Lactation Consultant
 - » CLCs – Certified Lactation Counselors
 - » CLEs – Certified Lactation Educators
- Coverage of services rendered by unlicensed individuals requires claims to be submitted by supervising licensed practitioners, and requires the state to assure:
 - » The licensed practitioner assumes professional responsibility for the services provided by the unlicensed practitioner; and
 - » The licensed practitioner bills for the services.

How is ODM proposing to pay for services provided by a lactation consultant in the future?

- Possible supervising licensed practitioners (who could also bill for the service if they hold appropriate certification/education)
 - » Physicians
 - » APRNs
 - » Non-Physician Licensed Behavioral Health Practitioners
 - » Dietitians
 - » Physical therapists
 - » Occupational therapists

How is ODM proposing to pay for services provided by a lactation consultant in the future?

- Continue reimbursement of E&M services based on ACOG guidelines for qualified practitioners
 - » Rendered by physicians, APRNs, PAs
- Begin reimbursement for S9443 (code for lactation classes, non-physician provider, per session)

Policy Impacts

Policy Impacts

- A new policy would be created to outline coverage and payment criteria for lactation consultants
- This would likely be a part of the Chapter 5160-8 Limited Practitioner Services
- A draft rule would be available for comment before definitive coverage criteria would be determined.

Policy Impacts of Coding Changes

- Payment rates for the services would be outlined in Appendix DD to the Medicaid Payment rule (5160-1-60)
 - » New codes/rates will be added
- Please submit comments to MISP@medicaid.ohio.gov regarding lactation counseling services by July 7, 2021
- Future updates will be issued through the MISP listserv and ODM rulemaking process

Next Steps

Next Steps for Lactation Consultants

- Continue development of OAC rules with integration of stakeholder feedback
- Continue to work with CMS on updating ODM's State Plan to include new coverage
- Engagement with Medicaid Managed Care Organizations (MCOs)
- Update ODM's claims payment system (create specialty and update coding)

Upcoming MISP Stakeholder Opportunities

- No pre-registration is required
- Please create a placeholder on your calendar as a reminder
- Visit <https://www.medicaid.ohio.gov/INITIATIVES/Maternal-and-Infant-Support> for links to join the meetings

Meeting Name(link to materials)	Date	Time
Group Pregnancy Education	5/26/2021	1PM
Lactation Consulting	6/9/2021	9:30AM
Doula Services	6/23/2021	10AM
Nurse Home Visiting Services	Coming Soon	TBD

Next Steps for MISP

- To join the listserv for MISP notifications, please enter your name and email address in the indicated boxes at our website: <https://www.medicaid.ohio.gov/INITIATIVES/Maternal-and-Infant-Support>
- Sign up for future MISP meetings at the link above.
- MISP updates will be made on a rolling basis through the SFY22-23 biennium
- **Questions and comments can be sent to** [**MISP@medicaid.ohio.gov**](mailto:MISP@medicaid.ohio.gov)

Questions and comments are encouraged!