

Department of Health Care Policy and Financing (HCPF)

Doula Stakeholder Update Meeting

April 30th, 2024

Welcome!

- **THANK YOU FOR JOINING US!**
 - **This meeting is being recorded** for transparency and to keep track of next steps.
 - It will be posted to our website along with these slides.
- **Department Staff:**
 - *Susanna Snyder, Child and Family Health Division Director*
 - *Brooke Greenky, Reproductive Health Unit Supervisor*
 - *Welcome to Annette Dayley :)*
- **There are a lot of people here today!**
 - Please put your name, pronouns and any organization or title you may want to share in the chat!



Our Mission:

Improving health care equity, access and outcomes for the people we serve while saving Coloradans money on health care and driving value for Colorado.

What We Do

The Department of Health Care Policy & Financing administers Health First Colorado (Colorado's Medicaid program), Child Health Plan *Plus* (CHP+) and other health care programs for Coloradans who qualify.

Today's Agenda

11:15 - 11:20	Intro/Welcome
11:20 - 11:30	Background, Context, and Recap
11:30 - 12:00	Billing and Enrollment (Review and Discussion)
12:00 - 12:25	Physician Oversight Rule (Review and Discussion)
12:25 - 12:45	Additional Time for Feedback/Discussion
12:45 - 1:00	Wrap Up, Next Steps

GOAL: Medicaid coverage of Doulas this July!!

Meeting Objectives

1. Celebrate the work in our final implementation stages of this new benefit!
2. Review basics and how we got here
3. Introduce billing guidance and enrollment processes
4. Receive feedback on “physician oversight” rule
5. Prep for next steps and “go-live”

Reminders

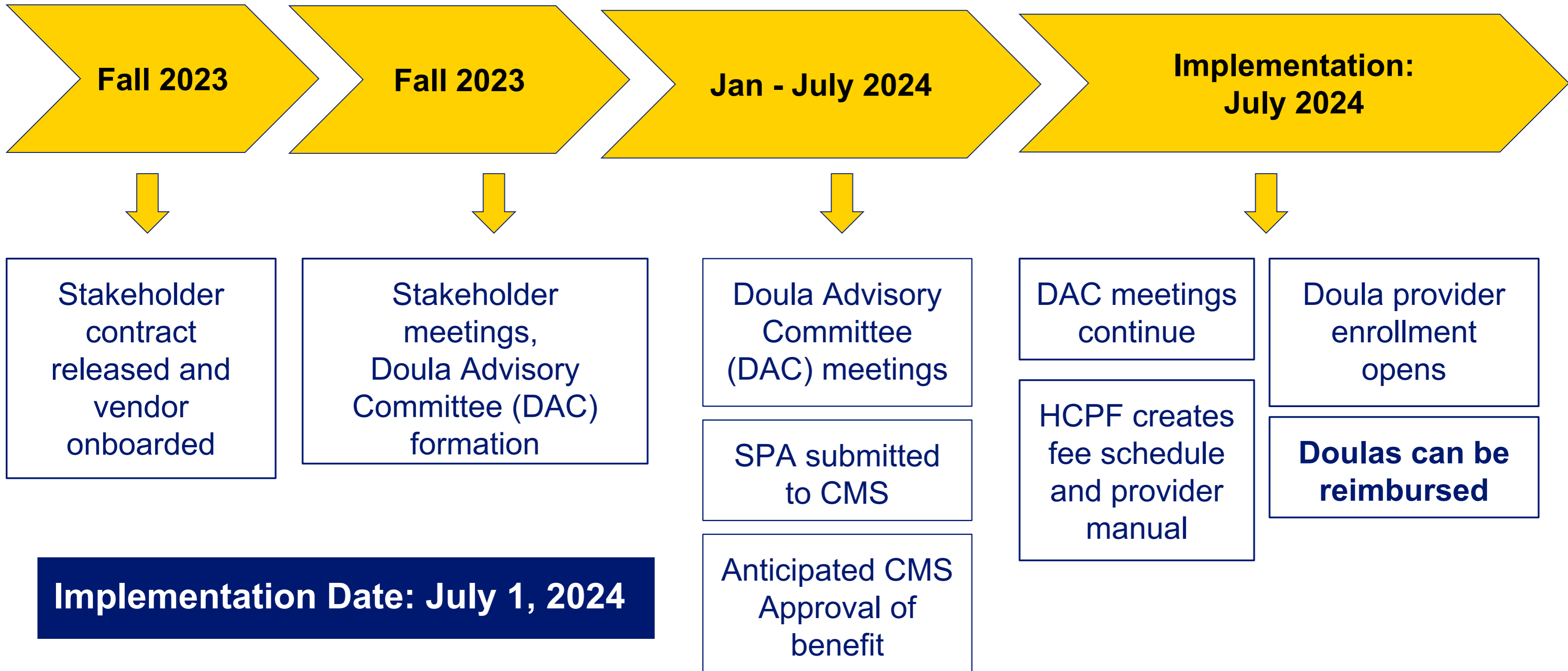
- This is a high passion space! Please respect all the opinions and the voices you hear today.
- **Our shared goal** is an equitable, accessible benefit that is live on July 1st!
- *Some things are set in stone.*
 - We are still bound by certain federal, state, and administrative regulations.
- *Some things are still flexible.*
 - **Our priority remains getting this launched July 1 so that our pregnant members do not have to wait another day without covered doula care.**
 - Many decisions had to be made already for our system to allow for enrollment, AND they can evolve.
 - **PLEASE** - join our Doula Advisory Committee to help us keep a pulse on these (and other) opportunities.

Doulas for Medicaid Members

How did we get here?

Historically and Ongoing: Doula Community-Led Work	
2021-22	HCPF work nationally and internally on opportunity
2022	Governor's Budget Released (11/1/22)
	Targeted Stakeholder Discussions Begin
2023	Partner stakeholder work
	Budget approval through legislature
	SB23-288 Complements (Stakeholder work, Scholarship, Authority)
	Kickoff!

Project Timeline



Billing and Enrollment

What Goes into Creating a New Provider Type?

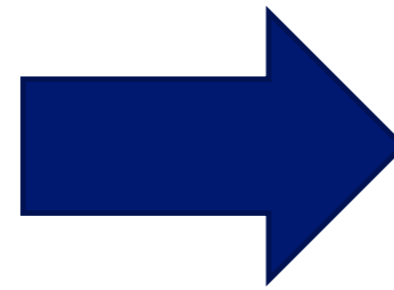
Federal Policy

State Policy

HCPF Operations and Systems

Provider Common Practices

Community and Patient Needs



Key Decision Points

- ✓ SPA & Rule Changes
- ✓ Enrollment/Licensing Requirements
- ✓ Rates & Reimbursement
- ✓ Billing Requirements
- ✓ Scope of Practice
- ✓ Stakeholder Engagement and Communications

Enrolling as a Medicaid Provider

- Enrollment Process/Forms
- Enrollment Requirements
- Malpractice Insurance Requirements
- Revalidation - *for a later date*

What we know today:

- Provider Enrollment Requirements
 - Enrollment Pathways
 - *You will see references to supplemental documents that we are still finalizing including our billing manual.*
- Billing Structure - How we are reimbursing

Doula Provider Enrollment: Attestation(s) and Pathways

- How can doulas enroll with Medicaid? What are our requirements?
- Doula's must attest to one of the following:
 - Option 1: Certification Pathway
 - Option 2: Experience Pathway

Option One: Certification Pathway

Four Attestations:

(1) I attest that have received training as a Doula from one of the Department approved Training Organizations. List can be found on the Doula Billing Manual found here. Attach a copy of this certification. *(Note: we are going to discuss training organizations on the next slide today)*

(2) I attest that I have attended at least three births (not including your own) within the last five years. Attach a copy of a complete Birth Attendance Attestation Form found in the Doula Billing Manual found here.

(3) I attest that I have current CPR Training Credentials. Attach a copy of this certificate/card.

(4) I attest to follow the Doula Code of Conduct found here. Attach a copy of this signed Code of Conduct.

Certification Pathway: Attestation #1 Details

Attestation #1:

I attest that have received training as a Doula from one of the Department approved Training Organizations. List can be found on the Doula Billing Manual found [here](#). Attach a copy of this certification.

What you need to know:

- “Doula Training Organization Form” to be released next month. This form will ask interested organizations to fill out some key information including # of hours, languages offered, competencies covered, and contact information.
- We will ask any interested organizations to fill this out for evaluation to add to the list. This list will live on our website so it can be fluid.
- **The minimum # of training hours required will be 18.**

Certification Pathway: Attestation #1 Details

Attestation #2:

I attest that I have attended at least three births (not including your own) within the last five years. Attach a copy of a complete Birth Attendance Attestation Form found in the Doula Billing Manual found here.

What you need to know:

- “Birth Attendance Attestation Form” to be released next month.
- The minimum # of births in addition to certification will be three (3).

Certification Pathway: Attestation #1 Details

Attestation #3:

I attest that I have current CPR Training Credentials. Attach a copy of this certificate/card.

What you need to know:

- CPR Training Required

Certification Pathway: Attestation #1 Details

Attestation #4:

I attest to follow the Doula Code of Conduct found here. Attach a copy of this signed Code of Conduct.

What you need to know:

- Code of Conduct to be provided next month.
- The DAC will be tasked with any edits/updates to this document.

Option Two: Experience Pathway

Five Attestations

- (1) I attest that I have attended at least 10 births in my role as a doula AND at least 5 of them in the past two years. Attach a copy of a complete Birth Attendance Attestation Form found in the Doula Billing Manual found here.
- (2) I attest that I have attached four letters of recommendation. Two (2) letters of recommendation **MUST** be from clinical providers who were the primary obstetric provider at births I have attended and two (2) letters of recommendation from previous clients.
- (3) I attest that I will follow the Doula Code of Conduct (linked here). Attach a copy of this signed Code of Conduct.
- (4) I attest that I have current CPR Training Credentials. Attach a copy of this certificate/card.
- (5) As a doula applying for inclusion in the Colorado Medicaid Doula Benefit, I attest to having knowledge and competency in the following areas: (Please initial to indicate competency):

Pregnancy/Perinatal Support

Childbirth Education

Anatomy of pregnancy, childbirth and postpartum

Non-medical comfort measures

Labor Support Techniques

Newborn/Infant Care

Feeding/Lactation Support

Postpartum/Recovery Support

Family/Partner Support

Developing a Community Resource List

Trauma-Informed Care

Diversity, Equity, and Inclusion (Cultural Sensitivity)

Experience Pathway: Attestation #1 Details

Attestation #1:

I attest that I have attended at least 10 births in my role as a doula AND at least 5 of them in the past two years. Attach a copy of a complete Birth Attendance Attestation Form found in the Doula Billing Manual found here.

What you need to know:

- “Birth Attendance Attestation Form” to be released next month.
- The minimum # of births in the Experience Pathway will be ten (10) with five (5) in the past two years.

Experience Pathway: DRAFT Attestation Form

Dear HCPF,

I recommend _____*name*_____ and have known the above applicant for: _____ (allotted time in years/months).

My relationship to the applicant was (or is) in the following capacity:

Peer Client Profession Related Leader Licensed Provider Practicing Doula or Midwife

I hereby certify that I have been personally acquainted with the applicant named above and that to the best of my knowledge, I believe they exhibit ethical and professional character expected of a Doula/Community birthing professional.

[Insert details on professional relationship and reasons for support, 1-3 paragraphs]

I confirm that they possess the qualities and professional competencies expected of a doula aiding individuals and families as a birthing partner.

Additional Remarks: _____

Experience Pathway: Attestation #3 & #4 Details

Attestation #3:

I attest that I will follow the Doula Code of Conduct (linked here). Attach a copy of this signed Code of Conduct.

Attestation #4:

I attest that I have current CPR Training Credentials. Attach a copy of this certificate/card

Experience Pathway: Attestation #5 Details

Attestation #5:

As a doula applying for inclusion in the Colorado Medicaid Doula Benefit, I attest to having knowledge and competency in the following areas: (Please initial to indicate competency):

- Pregnancy/Perinatal Support
- Feeding/Lactation Support
- Childbirth Education
- Postpartum/Recovery Support
- Anatomy of pregnancy, childbirth and postpartum
- Family/Partner Support

Pause for Questions

Additional Enrollment Details

Discussion Point	Decision Point
Liability Insurance	Required to align with Department policy.
Mandatory Reporter Enrollment	Not required but plans to support interested doulas and empower.
Background Checks	Required at “high-risk” level for first six months with intent to evaluate at that point and ideally shift to “moderate.”

Billing Medicaid for Services

- Covered Services
- Scope of Practice
- Claims Processing
- Billing Guidance

Enrollment and Billing

- Medicaid Enrolled Providers
 - Need NPI & Other Enrollment Criteria
- Submit Claims through online Portal
 - Billing Details (who, what, when, where, why?)
- Reimbursement or Denial
 - Based on accuracy of claim submission

Funding for training and troubleshooting to support providers in this process

Provider Support to Come

- FAQ Document
- Mission Analytics
 - Provider Videos (doula specific)
 - Optional Quizzes
 - Billing Guidance and Manual

Billing Methodology:

As a reminder, each member is eligible for up to \$1,500 per pregnancy

Service Type	Diagnosis (DX) Code	Code	Rate	Max Units/\$ (year)	Telemed	Visit Structure Options
Prenatal	Z33.1	T1032 = 15 Minutes	\$25	12 units/\$300	Y	Up to 180 minutes in 15-minute increments [e.g. 3, 60-minute visits; or 2, 90- minute visits]
Postpartum	Z39.2	T1032 = 15 Minutes	\$25	12 units/\$300	Y	Up to 180 minutes in 15-minute increments [e.g. 3, 60-minute visits; or 2, 90- minute visits]
Labor & Delivery	Z33.1	T1033 = Per Diem	\$900	1 unit/\$900	N	1 service

Physician Oversight Rule

Colorado Code of Regulations

Section 8.200.2.D.1

8.200.2.D. Physician services that may be provided by a non-physician provider when supervised by an enrolled provider.

1. With the exception of the non-physician providers described in Sections 8.200.2.A. through 8.200.2.C. and 8.200.2.D.1.a., a non-physician provider may provide covered goods and services only under the Direct Supervision of an enrolled provider who has the authority to supervise those services, according to the Colorado Department of Regulatory Agencies rules. If Colorado Department of Regulatory Agencies rules do not designate who has the authority to supervise, the non-physician provider must provide services under the Direct Supervision of an enrolled physician, **with the exception of doulas.**
 - a. Registered Nurses (RNs) are authorized to provide delegated medical services within their scope of practice as described in the Colorado Department of Regulatory Agencies rules under General Supervision.

Next Time:

- Connecting members with services
- Verifying eligibility
- Scholarship(s)
- DAC Next Steps
- Doula Hub: Mission Analytics and future opportunities...

**Check In:
what else do
you want to
discuss?**



Next Steps and Reminders:

1. Slides and Recording will be Posted!
2. Sign up for our Newsletter, and stay tuned for updates (doula specific??)
3. Contact Brooke.Greenky@state.co.us with any questions
4. Apply for our DAC

Questions?





Thank You!

CONTACT US:

Brooke.Greenky@state.co.us

Susanna.Snyder@state.co.us

Annette.Dayley@state.co.us