

Specialty Billing Training

Doula & Lactation Support Services

Health First Colorado
(Colorado's Medicaid Program)



Navigating This Presentation

- Underlined words or phrases often will link viewers to more information, such as web pages. If you are viewing this presentation in normal mode (not slideshow mode), you may need to press the Ctrl key while you click on the link in order to open it.
- Use color-coded table of contents slides to navigate to specific areas of interest in the presentation.
 - Use back arrows provided in the bottom right corner of some slides to return to table of contents slides.



Agenda

Program Overview

Provider Enrollment

Billing & Payment

Resources



Program Overview

Program Overview

Doula

- Doula benefit program for members who are pregnant or have given birth
- Member eligibility criteria:
 - Eligible for Health First Colorado
 - Be pregnant or have given birth within the last 365 days



Program Overview

Doula

- Doula benefit includes three categories of service:
 1. Prenatal support
 2. Continuous labor and delivery support
 3. Postpartum support
- Service limits are based on each member
- More than one doula may see each member
- If a doula identifies needs beyond approved services, they should reach out to the member's Regional Accountable Entity (RAE) for care coordination

Program Overview

Doula

- Benefit program intends to leverage community-based doula model
 - Improves outcomes for pregnant people
 - Continuous labor support
 - Wraparound pre and postnatal care
- Not a substitute for clinical obstetric care or behavioral health care with licensed providers



Program Overview

Lactation Support Services

- Benefit introduced December 1, 2024
- Result of legislation HB 22-1289
- Rules governing program outlined in Code of Colorado Regulations
 - 10 C.C.R. 2505-10 8.732.7



Program Overview

Lactation Support Services

- Program gives access to services including training and counseling lactating members about breastfeeding and lactation
- Comprehensive, skilled care and evidence-based information
- Member eligibility criteria:
 - Eligible for Health First Colorado
 - Be a pregnant, postpartum or pediatric member who is breastfeeding

Program Overview

Lactation Support Services

- Prior authorization not required
- No amount, duration or scope limitations for lactation support services benefit
- Service delivery options:
 - In-person **OR** telehealth
 - 1-on-1 **OR** group setting



Provider Enrollment

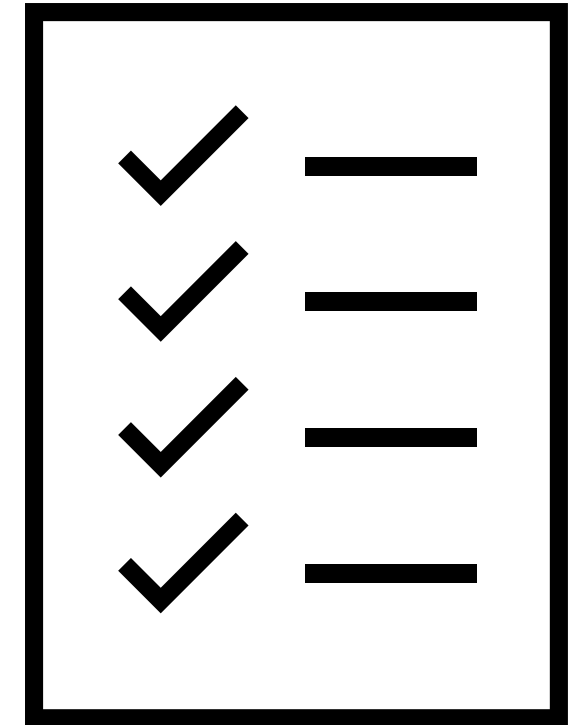
Provider Enrollment

Provider Type Definitions

Rendering provider: individual who performed the billed service

Billing provider: entity that receives reimbursement for the billed service

Referring provider: individuals who only prescribe, refer or order for Health First Colorado members



Provider Enrollment

Rendering Providers - Doula

Doula benefit program providers must be enrolled in Health First Colorado under either of these provider types:

1. Doula - PT 79

2. Lactation Support Service Provider

International Board-Certified Lactation Consultant (IBCLC) - PT 70

Certified Lactation Counselor (CLC) - PT 71

Certified Lactation Educator (CLE) - PT 71

- Meets doula qualifications per 10 C.C.R. 2505-10 8.734.4
- May provide doula service without a separate provider type 79 enrollment

Provider Enrollment

Eligible Rendering Providers - Doula

Doula support services may only be provided by individuals who meet qualifications of either:

1. Certification Pathway

- Hold a certification as a certified doula from a certifying body approved by the department, a list of approved doula training organizations can be found on the [doula webpage](#) under the heading *Forms for Doula Provider Enrollment > Approved Doula Training Organizations*

2. Experience Pathway

- Demonstrate all requirements are met

Provider Enrollment

Rendering Providers - Doula

Forms required to enroll as a doula provider type

Both Pathways:

- Signed Attestation for either the Certification or Experience Pathway
- Signed Doula Code of Conduct
- Current CPR Certification

Certification Pathway:

- Certificate from an approved doula training organization

Experience Pathway:

- Four Letters of Recommendation
- Initial Required Competencies on the Experience Pathway

Provider Enrollment

Cross-Billing

- Enrolled **doula** providers who meet IBCLC, CLC or CLE qualifications may provide lactation support without separate provider type 70 or 71 enrollment.
 - Doula providers are required to submit a copy of their current lactation certification and must receive verification that the submission was approved prior to rendering or billing for lactation support services.
- Enrolled **lactation support service** providers (IBCLC, CLC, or CLE) who meet doula qualifications may provide doula services without separate provider type 79 enrollment.

Provider Enrollment

Cross-Billing

Guidance for Doula Providers adding Lactation Services

Enrolled doula providers are required to submit a copy of their current certification through the Provider Web Portal as one of the following:

- Certified International Board-Certified Lactation Consultant (IBCLC) with current certification by the International Board of Lactation Consultant Examiners (IBLCE)
- Certified Lactation Counselor (CLC) with current certification by the Academy of Lactation Policy and Practice, Inc. (ALPP)
- Certified Lactation Educator (CLE) with current certification by the Childbirth and Postpartum Professional Association (CAPPA)

Provider Enrollment

Rendering Providers - Lactation Support Services

1. Lactation Consultant (IBCLC)

- Provider type 70, specialty code 215
- Enrollment type: Individual Within a Group
OR Billing Individual
- Provider must be certified IBCLC

2. Lactation Counselor or Educator (CLC or CLE)

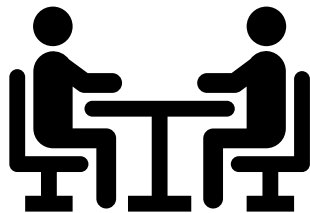
- Provider type 71, specialty code 216
- Enrollment type: Individual Within a Group
- Provider must be certified CLC or CLE



Provider Enrollment

Eligible Rendering Providers - Lactation Support Services

- Lactation support services may only be provided by enrolled individual providers with training in advanced lactation support
- Un-enrolled providers may not bill
 - Example: supervised interns, persons undergoing training to become a CLE, CLC, or IBCLC
- Other provider types may provide lactation support services if it is within their scope of practice and provider has training in advanced lactation support



Provider Enrollment

Eligible Rendering Providers - Lactation Support Services

- International Board-Certified Lactation Consultant (IBCLC) - PT 70
- Certified Lactation Counselor (CLC) - PT 71
- Certified Lactation Educator (CLE) - PT 71



Provider Enrollment

Eligible Rendering Providers - Lactation Support Services

- Certified Professional Midwife (CPM)/Direct Entry Midwife (DEM) - PT 69
- Certified Midwife (CM) - PT 80
- Certified Nurse Midwife (CNM) - PT 22
- Licensed Physician (MD) - PT 05
- Licensed Osteopath (DO) - PT 26
- Licensed Physician Assistant (PA) - PT 39
- Licensed Advanced Practice Nurse (APN) - PT 41
- Licensed Registered Nurse (RN) - PT 24 (enrolled as a Non-Physician Practitioner-Individual)
- Certified Registered Nurse Anesthetist (CRNA) - PT 40
- Occupational Therapist (OT) - PT 28
- Speech Therapist (SLP) - PT 27

Provider Enrollment

Supervision Requirements - Lactation Support Services

- **International Board-Certified Lactation Consultants (IBCLCs)** may provide lactation support services without supervision
- **Certified Lactation Counselors (CLCs)** and **Certified Lactation Educators (CLEs)** may only provide lactation support services under general supervision
 - May render services but do not bill directly
 - Claims must be submitted through group
 - Claims must identify the CLC/CLE with their National Provider Identifier (NPI) number as the rendering provider

Provider types (PT) qualified to supervise:

- Physicians (MDs) PT 05/65
- Osteopaths (DOs) PT 26
- Physician Assistants (PAs) PT 39
- Advanced Practice Nurses (APNs) - PT 41
- Certified Nurse Midwives (CNMs) - PT 22
- International-Board Certified Lactation Consultants (IBCLCs) - PT 70

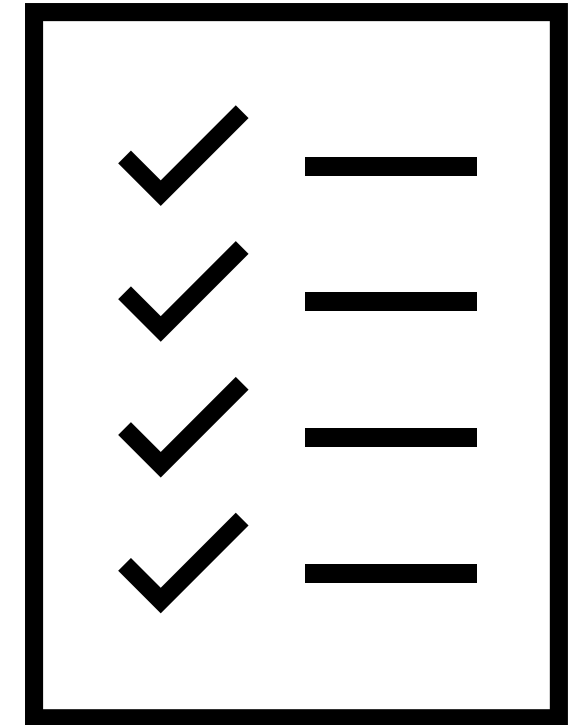
Provider Enrollment

Provider Type Definitions

Rendering provider: individual who performed the billed service

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Referring provider: individuals who only prescribe, refer or order for Health First Colorado members



Provider Enrollment

Billing Providers: Individual - Doula

Billing Individual - bills directly for themselves

- Individuals complete only one enrollment application regardless of enrollment type and number of service locations
- Must enroll using the individual's Social Security Number (SSN)

Provider Enrollment

Billing Providers: Group - Doula

- **Individual within a Group** - affiliates to a group and the group bills
- **Group** provider types that may bill for doula services include:
 - Clinic - provider type 16
 - Non-physician Practitioner Group - provider type 25
 - Lactation/Doula Professional Group - provider type 72
 - Billing provider type 72 must have at least one (1) IBCLC or doula affiliated with the group
 - Group practice consisting of any of the following professionals who are enrolled with the Department as approved providers:
International Board-Certified Lactation Consultant (IBCLC), Certified Lactation Counselor (CLC), Certified Lactation Educator (CLE), Doula
- Refer to Doula Billing Manual for group-specific billing guidelines

Provider Enrollment

Billing Providers: Individual - Lactation Support Services

Billing Individual - bills directly for themselves

- Individuals complete only one enrollment application regardless of enrollment type and number of service locations
- Must enroll using the individual's Social Security Number (SSN)
- Eligible individual billing providers:
 - International Board-Certified Lactation Consultant (IBCLC) - PT 70
 - Certified Midwife (CM) - PT 80
 - Certified Nurse Midwife (CNM) - PT 22
 - Licensed Physician (MD) - PT 05
 - Licensed Osteopath (DO) - PT 26
 - Licensed Advanced Practice Nurse (APN) - PT 41
 - Enrolled Doula providers who meet IBCLC, CLC or CLE qualifications - PT 79

Provider Enrollment

Billing Providers: Group - Lactation Support Services

- **Individual within a Group** - affiliates to a group and the group bills
- **Group** provider types that may bill for lactation support services include:
 - Federally Qualified Health Center (PT 32)
 - Rural Health Clinic (PT 45)
 - Indian Health Services (PT 61)
 - Clinic (PT 16)
 - Non-physician Practitioner Group (PT 25)
 - Lactation/Doula Professional Group (PT 72)
- Refer to Lactation Support Services Billing Manual for group-specific billing guidelines

Provider Enrollment

Billing Providers: Facility - Lactation Support Services

Facility - submits claims for services, income reported through Employer Identification Number (EIN), separate NPI required for each service location

- Group provider types that may bill for lactation support services include:
 - **Supply (PT 14)**
- When claim is submitted using supplier as billing provider, use NPI of provider who rendered service
- This rendering provider does not need to be affiliated with the group for claim to process

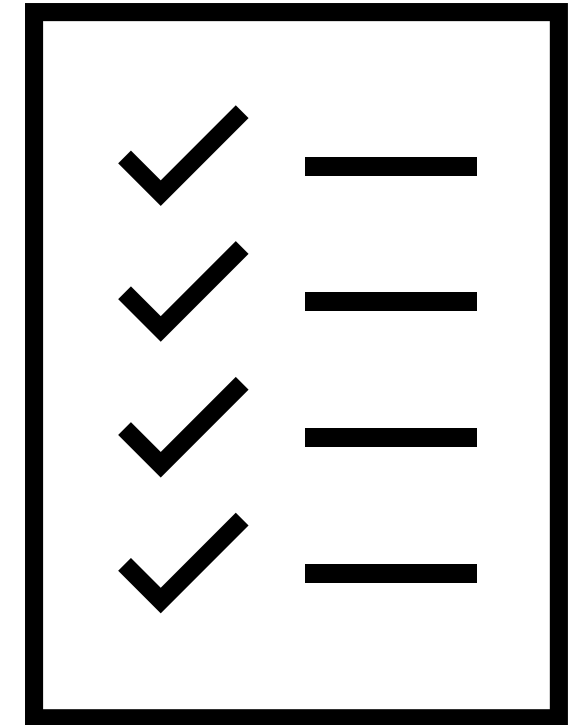
Provider Enrollment

Provider Type Definitions

Rendering provider: individual who performed the billed service

Billing provider: entity that receives reimbursement for the billed service

Referring provider: individuals who only prescribe, refer or order for Health First Colorado members



Provider Enrollment

Referring Providers - Doula & Lactation

- Doula and lactation support services are provided as preventive services and require a referral
- Referring providers must be enrolled in Health First Colorado
 - List NPI on claim
 - Failure to revalidate will result in claim denial

Provider Enrollment

Referring Providers - Doula

Eligible referring provider types:

- Physicians (PT 05/65)
- Physician Assistants (PT 39)
- Advanced Practice Nurses (PT 41)
- Nurse Midwives (PT 22) and Certified Professional Midwives/Direct Entry Midwives (PT 69)
- Licensed Psychologist (PT 37) and Licensed Behavioral Health Clinical (PT 38)



Provider Enrollment

Referring Providers - Lactation Support Services

Eligible referring provider types:

- Physicians (PT 05/65)
- Osteopaths (PT 26)
- Physician Assistants (PT 39)
- Advanced Practice Nurses (PT 41)
- Nurse Midwives (PT 22)
- Certified Midwife (CM) (PT 80)
- Certified Professional Midwife (CPM) /
Direct Entry Midwife (DEM) (PT 69)
- Non-Physician Practitioner-Individual (PT 24)



Billing & Payment

Billing & Payment

Third-Party Liability (TPL)

- **Third-party liability (TPL)** refers to outside insurance or resources a member may have in addition to Health First Colorado
- Special bypass edits are in place when claims are submitted by the following provider types:
 - PT 70 - Lactation Consultant
 - PT 72 - Lactation/Doula Professional Group
 - PT 79 - Doula

Billing & Payment

Reporting Units of Service

- **Timed** procedure codes are used for services delivered on any single day
 - Units are reported in 15-minute increments
- **Untimed** procedure codes are not defined by a specific timeframe
 - Units are reported based on the number of times the procedure is performed



Billing & Payment

Reporting Units of Service

- Providers should not bill for services performed for less than 8 minutes
- Providers should bill a single 15-minute unit for treatment greater than or equal to 8 minutes through and including 22 minutes

Billed Units Increment	Time Spent in Direct Patient Contact
1 unit of service	8 minutes through 22 minutes
2 units of service	23 minutes through 37 minutes
3 units of service	38 minutes through 52 minutes
4 units of service	53 minutes through 67 minutes
5 units of service	68 minutes through 82 minutes
6 units of service	83 minutes through 97 minutes
7 units of service	98 minutes through 112 minutes
8 units of service	113 minutes through 127 minutes

Example:

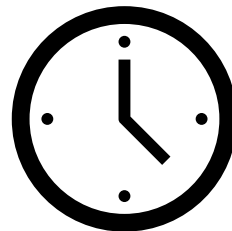
A member received a total of 60 minutes of prenatal doula birth worker services codes using HCPCS "timed" code T1032 which is defined in 15-minute units, on a given date of service.

The provider would then report **four (4) units** of code T1032.

Billing & Payment

Documenting Units of Service

- Lactation support service providers and doulas must maintain documentation in accordance with 10 CCR 2505-10 8.130.2 that complies with state and federal regulations
- Providers must retain records indicating dates and precise times at which direct services provided to member began and ended
- Timestamps are critical for validating number of units of service billed



Billing & Payment

Procedure Codes & Modifiers - Doula

- Procedure Codes
 - **T1032** = prenatal and postpartum services (timed)
 - **T1033** = labor and delivery services (untimed)
- Modifiers for telemedicine delivery, claim field completion instructions, and claim example available in the [Doula Billing Manual](#)



Billing & Payment

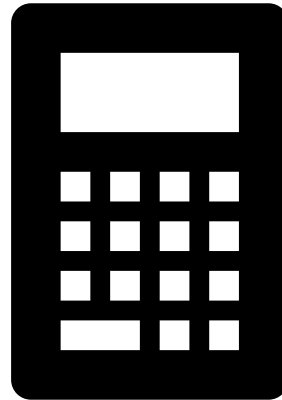
Coding Table - Doula

Covered Service Category	Limitation	HCPCS Code	ICD-10 Diagnosis Code
Doula birth worker services, prenatal	12 units of service (180 minutes) per member pregnancy	T1032 (Telemedicine service delivery allowed)	Z33.1
Doula birth worker services, delivery	1 unit of service ('untimed' code)	T1033 (Telemedicine service delivery not allowed)	Z33.1
Doula birth worker services, postpartum	12 units of service (180 minutes) per member pregnancy	T1032 (Telemedicine service delivery allowed)	Z39.1

Billing

Managed Care Plans - Doula

- Doula services are not included in managed care plans
 - Still a covered benefit for members enrolled in those plans
- Bill claims to Fiscal Agent



Billing & Payment

Procedure Codes & Modifiers - Lactation

- Procedure code S9443 is used for all lactation support services
- Modifier codes indicating individual (U1) or group settings (U2)
 - Group session (modifier U2) must be instructor-led breastfeeding education group
 - Claim for payment may be submitted for each enrolled Health First Colorado member that received services in the group session
- Modifiers for telemedicine delivery, claim field completion instructions, and claim example available in the Lactation Support Services Billing Manual

Billing & Payment

Procedure Codes & Modifiers - Lactation

Procedure Code	Description	First Position Modifier	Second Position Modifier
S9443	<p>Lactation Support Services</p> <p>Telemedicine service delivery is allowed.</p>	<p>U1 = individual session</p> <p>U2 = group session</p>	<p>U3 = 8-22 minutes</p> <p>U4 = 23-37 minutes</p> <p>U5 = 38-52 minutes</p> <p>U6 = 53-67 minutes</p> <p>U7 = 68-82 minutes</p> <p>U8 = 83-97 minutes</p> <p>U9 = 98-112 minutes</p> <p>UA = 113-127 minutes</p>

Billing & Payment

Procedure Codes & Modifiers - Lactation

- The provider should bill the claim under the eligible member for whom the visit was scheduled, or most closely aligns with the provider's scope of practice.
- Example:
 - Pediatrician would bill under the Health First Colorado enrolled breastfeeding child
 - Obstetrician would bill under the Health First Colorado enrolled lactating member



Billing & Payment

Procedure Codes & Modifiers - Lactation

When billing for lactation support services for twins, multiple infants or tandem breastfeeding, providers have two options:

1. Bill for extended time spent with the lactating member; OR
2. Bill separately for time spent with each breastfeeding child. Providers will need to ensure to bill for distinct and separate identifiable amounts of time for each pediatric member.

Billing

Referring Providers

- Referring (or “recommending”) providers are required on doula and lactation support services claims
- Providers must maintain record of recommendation for each member before initiating lactation care
- National Provider Identifier (NPI) of recommending provider actively enrolled in Health First Colorado must be indicated on claim
 - Ordering, Prescribing and Referring (OPR) field

OPR Field on Professional Claims

- Provider Web Portal field is labeled "Referring Provider"
- Paper claims use field 17.b
- Batch submissions use loop 2420 with qualifier DK (Ordering), DN (Referring) or DQ (Supervising)

Billing

Members on Managed Care Plans - Doula

- Doula services are **not** included in Health First Colorado physical health managed care plans
 - Still covered as “wrap-around” benefits
- All claims for lactation support services should be billed to the Department’s fiscal agent (Gainwell Technologies) even if member is attributed to a Health First Colorado managed care plan



Billing

Members on Managed Care Plans - Lactation Support Services

- Lactation support services are not included in Health First Colorado physical health managed care plans
- Lactation support services are still covered benefits for members enrolled in those plans as “wrap-around” benefits of the plan, similar to Doulas

To bill for services rendered to members on Child Health Plan Plus (CHP+)

- Providers must have active contract with a CHP+ Managed Care Organization (MCO)
- Providers should submit claims to the MCO once member is enrolled into an MCO

Billing

Place of Service Codes

- Prenatal and postpartum doula care and lactation support services can be provided in a variety of settings: member's home, clinics and provider offices, community-based settings, or via telehealth
- Visit setting should be indicated on claim using “Place of Service” code
- Specific allowed “Place of Service” codes can be found in the Doula Billing Manual & Lactation Support Services Billing Manual
- Telehealth services must adhere to the Telemedicine Billing Manual

Billing

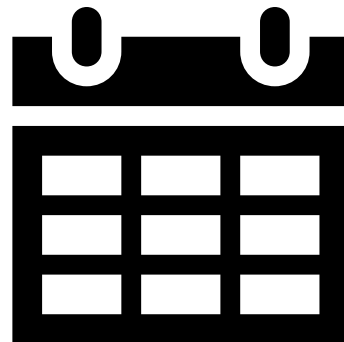
Place of Service Code Restrictions

- Doula labor and delivery services **cannot** be provided via telemedicine
- Lactation support services benefit **does not apply** when delivered:
 - In an Inpatient Hospital setting (place of service code 21)
 - In a Freestanding Birth Center setting (place of service code 25)
- HCPCS codes for lactation support services cannot be billed for dates on or during the date span of delivery and inpatient stay
- More information specific to these restrictions can be found in the Obstetrical Care Billing Manual

Billing

Dates of Service

- Two dates of service are available on claim submission
- **Single date of service** submissions should be entered in “From” field only
- Span billing is not permitted



Resources

Resources

For Our Providers web pages: <https://hcpf.colorado.gov/our-providers>

The **General Provider Information Manual** is an overview of the program, including billing and policy information

The **Doula Billing Manual** and **Lactation Support Services Billing Manual** provide specific guidance for the benefits

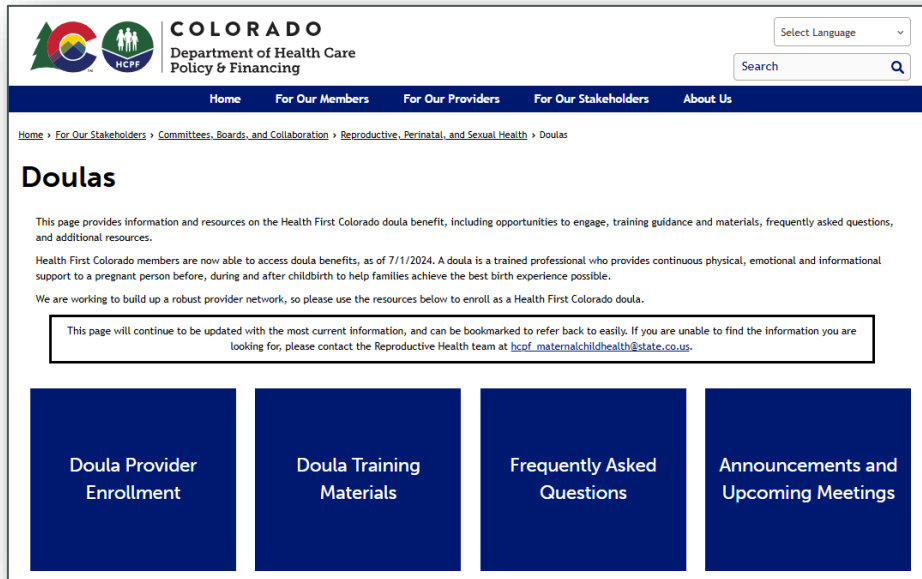
Provider Rates and Fee Schedule web page

Provider Contacts web page

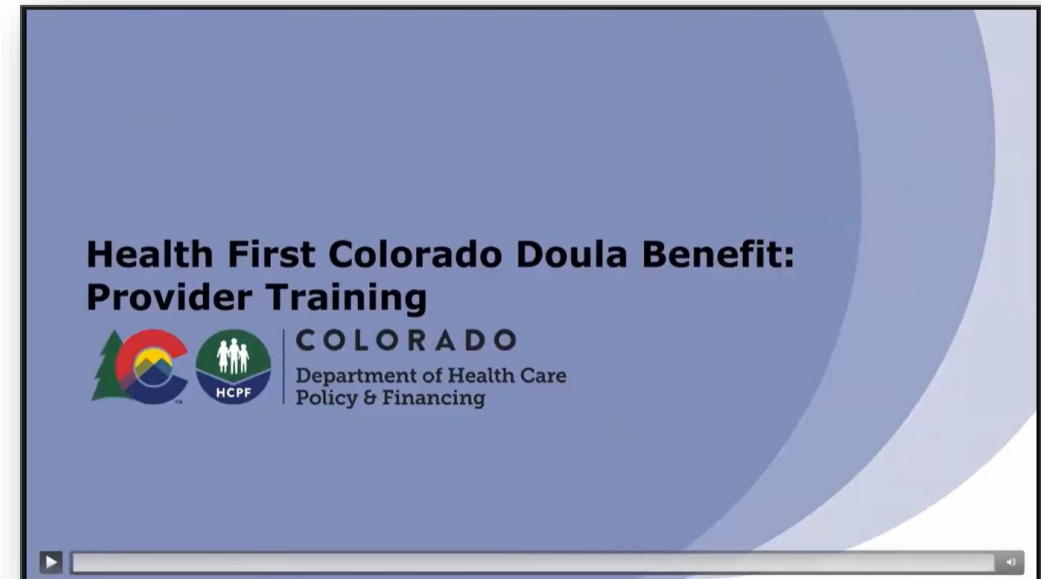


Doula Resources

Doula Benefit Web Page

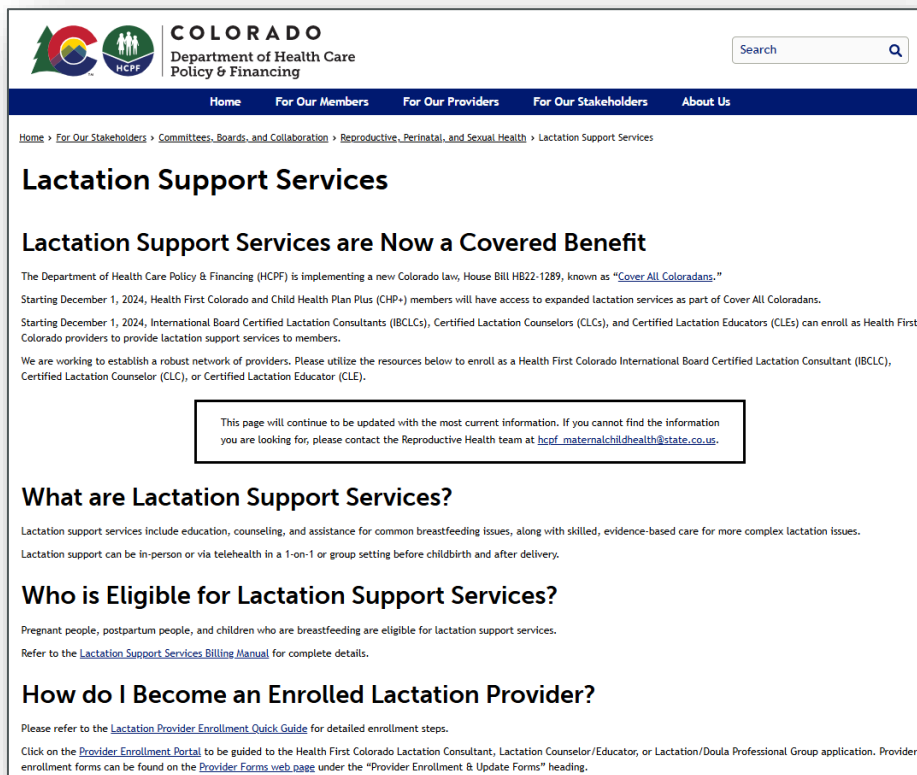


Doula Provider Training Video



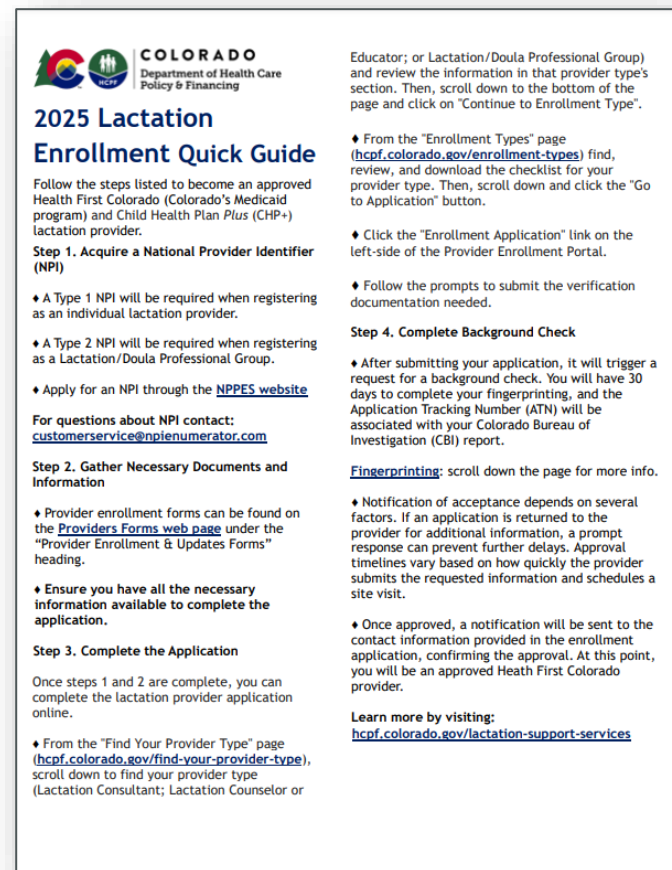
Lactation Resources

Lactation Support Services Web Page



The screenshot shows the Colorado Department of Health Care Policy & Financing website. The header includes the state logo, the department name, and a search bar. The navigation menu has links for Home, For Our Members, For Our Providers, For Our Stakeholders, and About Us. The breadcrumb trail reads: Home > For Our Stakeholders > Committees, Boards, and Collaboration > Reproductive, Perinatal, and Sexual Health > Lactation Support Services. The main heading is "Lactation Support Services". Below it, a subheading reads "Lactation Support Services are Now a Covered Benefit". The text explains that the department is implementing a new Colorado law, House Bill HB22-1289, known as "Cover All Coloradans." It states that starting December 1, 2024, Health First Colorado and Child Health Plan Plus (CHP+) members will have access to expanded lactation services as part of Cover All Coloradans. It further states that starting December 1, 2024, International Board Certified Lactation Consultants (IBCLCs), Certified Lactation Counselors (CLCs), and Certified Lactation Educators (CLEs) can enroll as Health First Colorado providers to provide lactation support services to members. A note mentions that the department is working to establish a robust network of providers and provides contact information for the Reproductive Health team at hcpf.maternalchildhealth@state.co.us. A box contains a disclaimer: "This page will continue to be updated with the most current information. If you cannot find the information you are looking for, please contact the Reproductive Health team at hcpf.maternalchildhealth@state.co.us." Below this, a section titled "What are Lactation Support Services?" defines the services as education, counseling, and assistance for common breastfeeding issues, along with skilled, evidence-based care for more complex lactation issues. It notes that lactation support can be in-person or via telehealth in a 1-on-1 or group setting before childbirth and after delivery. Another section titled "Who is Eligible for Lactation Support Services?" states that pregnant people, postpartum people, and children who are breastfeeding are eligible for lactation support services. It refers to the [Lactation Support Services Billing Manual](#) for complete details. The final section, "How do I Become an Enrolled Lactation Provider?", refers to the [Lactation Provider Enrollment Quick Guide](#) for detailed enrollment steps. A footer note mentions that provider enrollment forms can be found on the [Provider Forms web page](#) under the "Provider Enrollment & Update Forms" heading.

Lactation Enrollment Quick Guide



The screenshot shows the "2025 Lactation Enrollment Quick Guide" from the Colorado Department of Health Care Policy & Financing. The header includes the state logo, the department name, and a search bar. The main heading is "2025 Lactation Enrollment Quick Guide". The text explains that the guide provides steps to become an approved Health First Colorado (Colorado's Medicaid program) and Child Health Plan Plus (CHP+) lactation provider. It lists the steps: Step 1. Acquire a National Provider Identifier (NPI); Step 2. Gather Necessary Documents and Information; Step 3. Complete the Application; and Step 4. Complete Background Check. It also includes a section for "Learn more by visiting" with the link hcpf.colorado.gov/lactation-support-services. The guide provides detailed instructions for each step, including how to acquire an NPI, gather necessary documents, complete the application, and complete the background check. It also includes a section for "Learn more by visiting" with the link hcpf.colorado.gov/lactation-support-services.

2025 Lactation Enrollment Quick Guide

Follow the steps listed to become an approved Health First Colorado (Colorado's Medicaid program) and Child Health Plan Plus (CHP+) lactation provider.

Step 1. Acquire a National Provider Identifier (NPI)

- ♦ A Type 1 NPI will be required when registering as an individual lactation provider.
- ♦ A Type 2 NPI will be required when registering as a Lactation/Doula Professional Group.
- ♦ Apply for an NPI through the [NPPES website](#).

For questions about NPI contact:
customerservice@npienumerator.com

Step 2. Gather Necessary Documents and Information

- ♦ Provider enrollment forms can be found on the [Providers Forms web page](#) under the "Provider Enrollment & Updates Forms" heading.
- ♦ Ensure you have all the necessary information available to complete the application.

Step 3. Complete the Application

Once steps 1 and 2 are complete, you can complete the lactation provider application online.

- ♦ From the "Find Your Provider Type" page (hcpf.colorado.gov/find-your-provider-type), scroll down to find your provider type (Lactation Consultant; Lactation Counselor or Educator; or Lactation/Doula Professional Group) and review the information in that provider type's section. Then, scroll down to the bottom of the page and click on "Continue to Enrollment Type".

Step 4. Complete Background Check

- ♦ From the "Enrollment Types" page (hcpf.colorado.gov/enrollment-types) find, review, and download the checklist for your provider type. Then, scroll down and click the "Go to Application" button.
- ♦ Click the "Enrollment Application" link on the left-side of the Provider Enrollment Portal.
- ♦ Follow the prompts to submit the verification documentation needed.

After submitting your application, it will trigger a request for a background check. You will have 30 days to complete your fingerprinting, and the Application Tracking Number (ATN) will be associated with your Colorado Bureau of Investigation (CBI) report.

Fingerprinting: scroll down the page for more info.

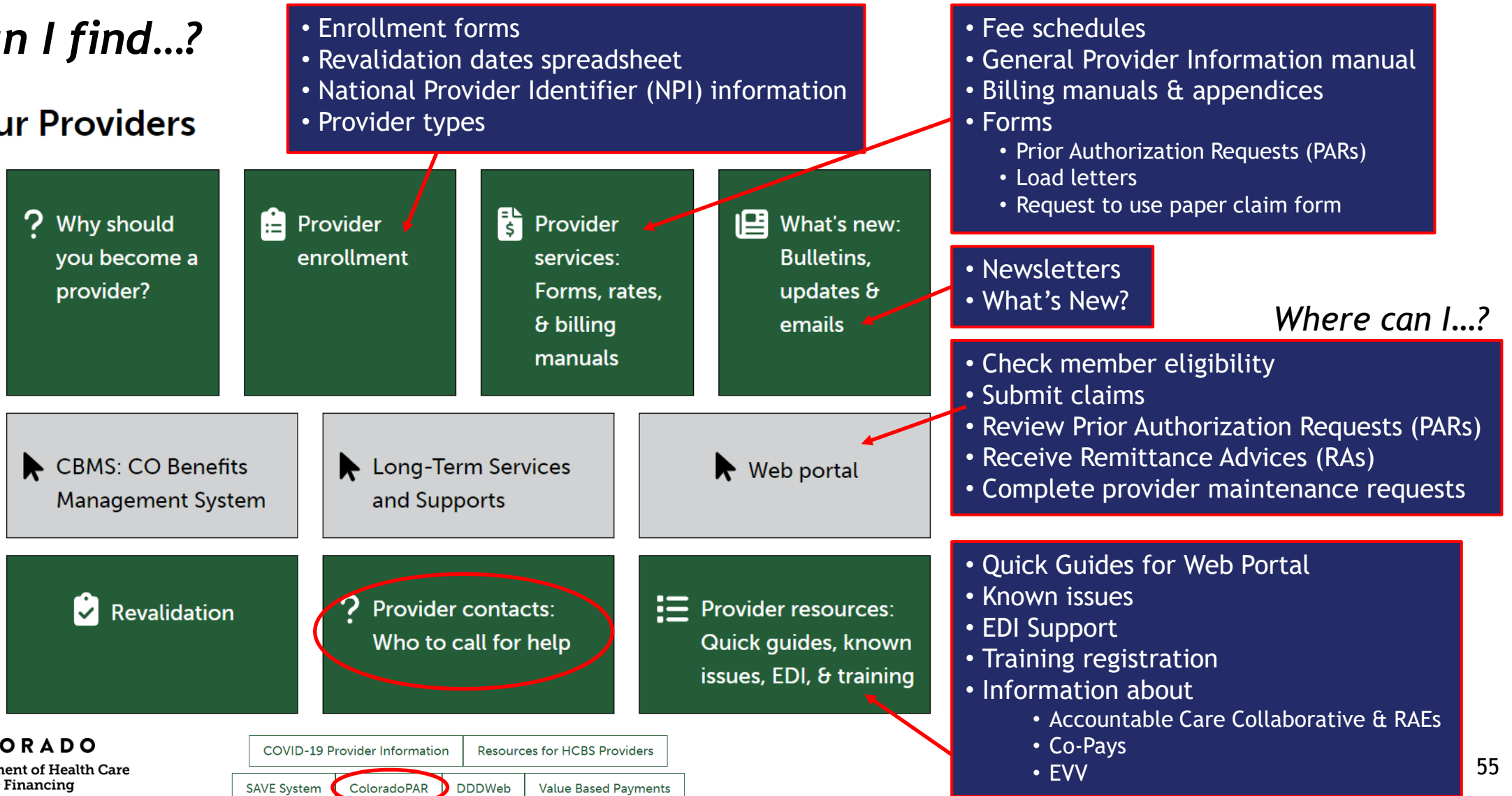
- ♦ Notification of acceptance depends on several factors. If an application is returned to the provider for additional information, a prompt response can prevent further delays. Approval timelines vary based on how quickly the provider submits the requested information and schedules a site visit.
- ♦ Once approved, a notification will be sent to the contact information provided in the enrollment application, confirming the approval. At this point, you will be an approved Health First Colorado provider.

Learn more by visiting:
hcpf.colorado.gov/lactation-support-services

hcpf.colorado.gov/our-providers

Where can I find...?

For Our Providers



Thank you!