

# 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

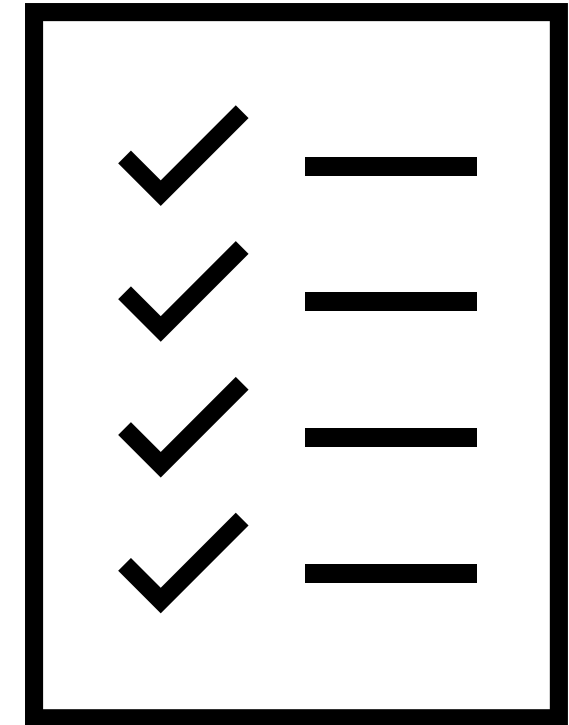
# Provider Enrollment

## 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)

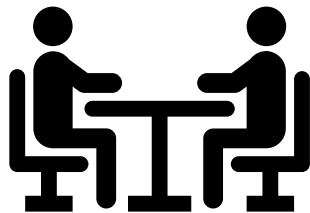
- Provider type 71, specialty code 216
- Enrollment type: Individual Within a Group
- Provider must be certified CLC or CLE



# 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
- 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)
- Enrolled Doula providers who meet IBCLC, CLC or CLE qualifications - PT 79

# 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

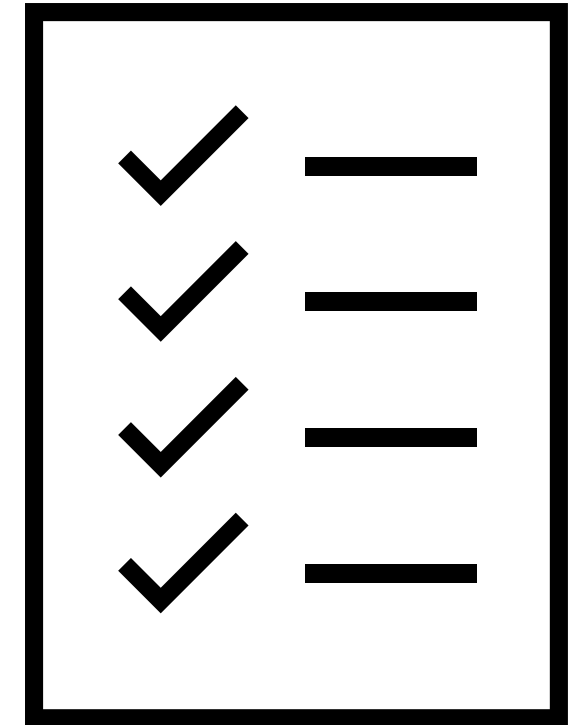
# Provider Enrollment

## Provider Type Definitions

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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

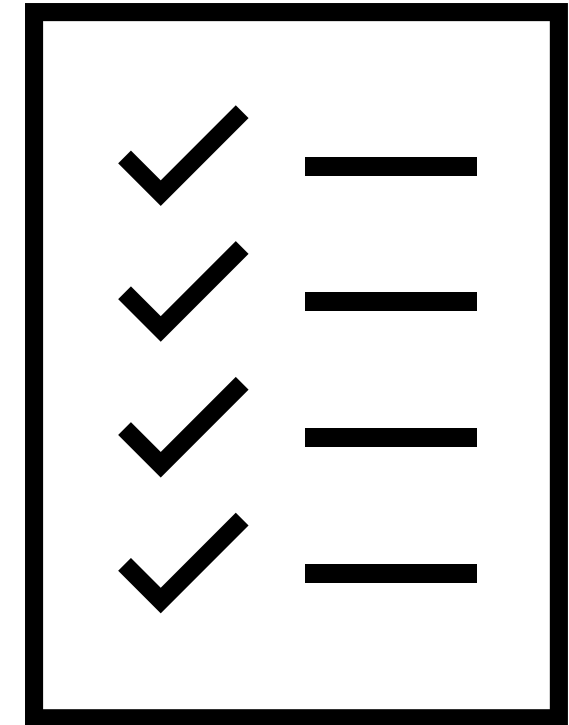
# Provider Enrollment

## 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:

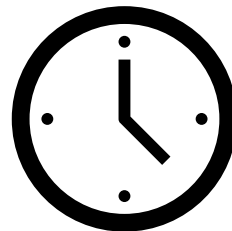
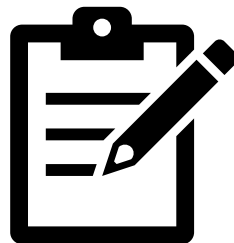
A member received a total of 60 minutes of prenatal doula birth worker services codes using HCPCS "timed" code T1032 which is defined in 15-minute units, on a given date of service.

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

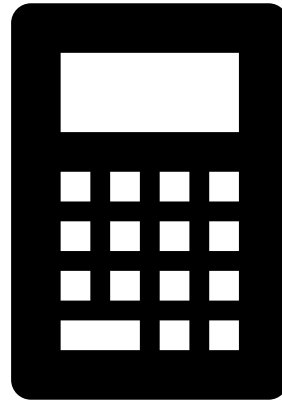
## Coding Table - Doula

| 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<br><br>(Telemedicine service delivery allowed)            | Z33.1                 |
| Doula birth worker services, delivery   | 1 unit of service ('untimed' code)                     | T1033<br><br>(Telemedicine service delivery <b>not</b> allowed) | Z33.1                 |
| Doula birth worker services, postpartum | 12 units of service (180 minutes) per member pregnancy | T1032<br><br>(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

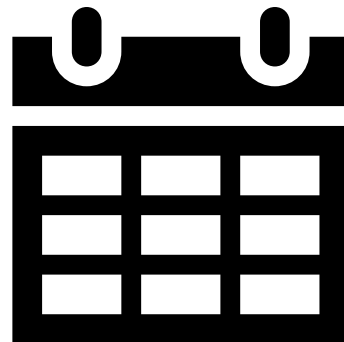
- Doula labor and delivery services **cannot** be provided via telemedicine
- Lactation support services benefit **does not apply** when delivered:
  - In an Inpatient Hospital setting (place of service code 21)
  - In a Freestanding Birth Center setting (place of service code 25)
- HCPCS codes for lactation 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

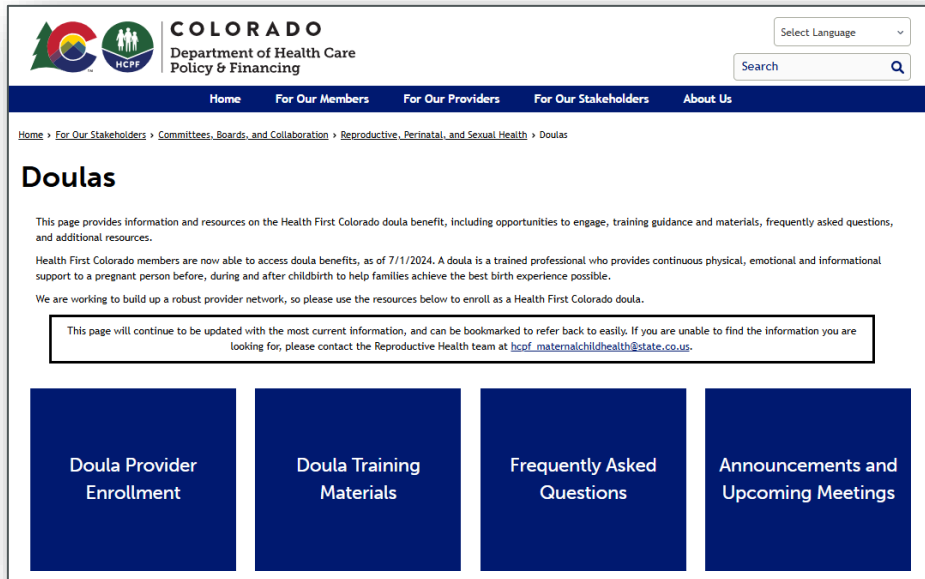
Provider Rates and Fee Schedule web page

Provider Contacts web page

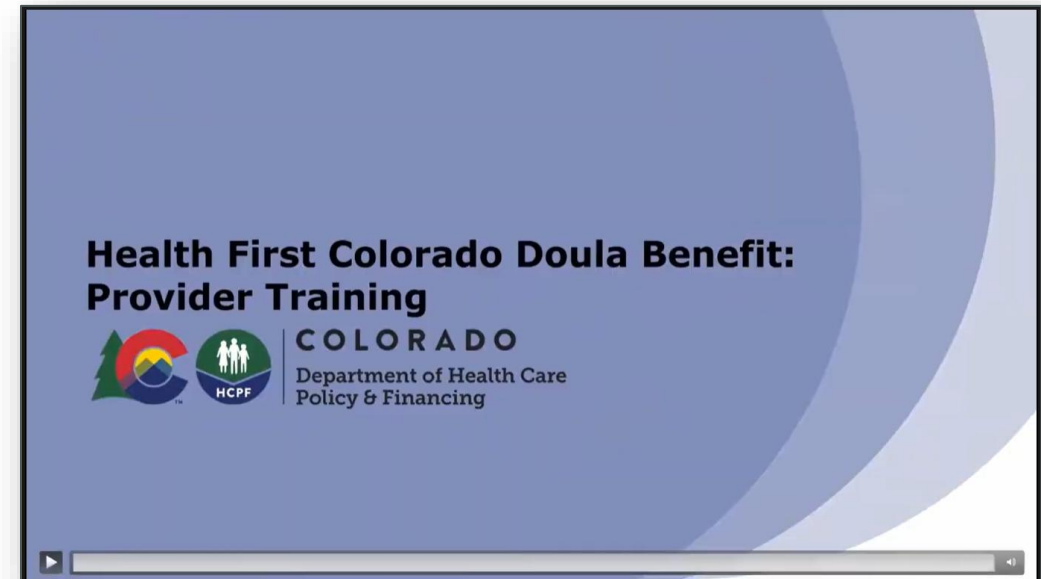


# Doula Resources

## Doula Benefit Web Page

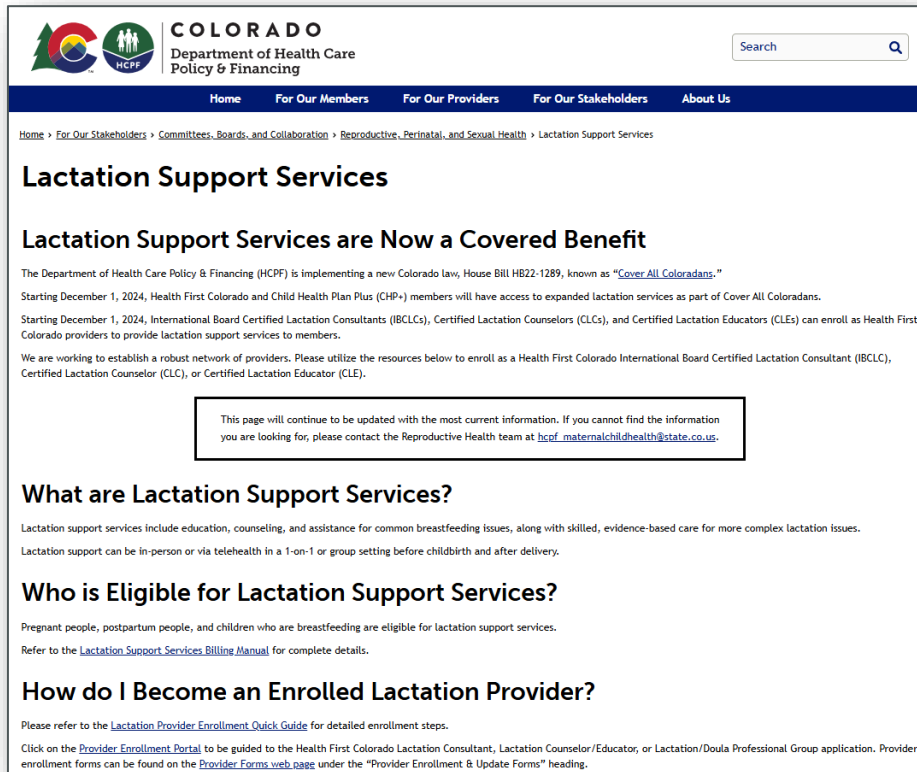


## Doula Provider Training Video



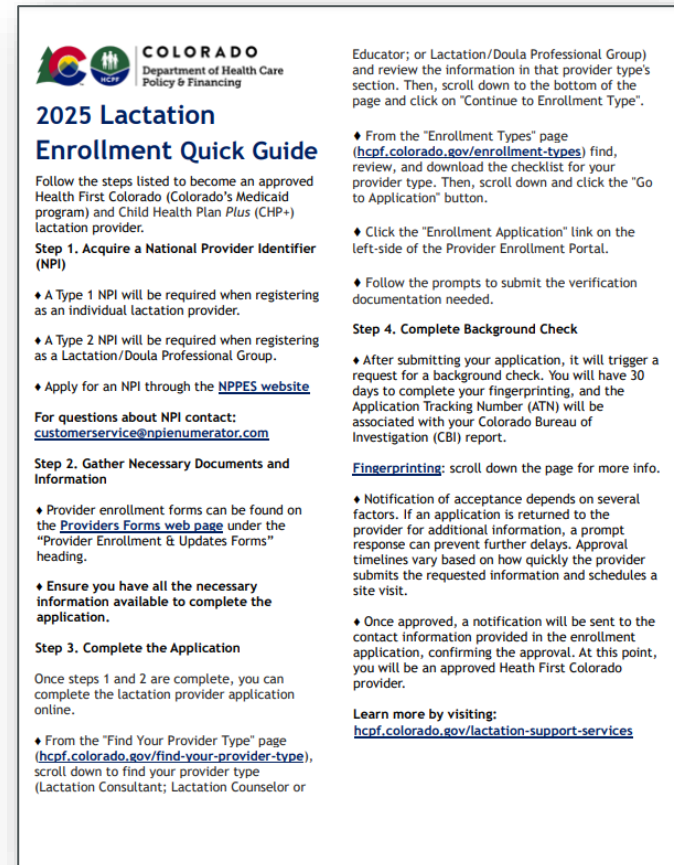
# Lactation Resources

## 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." 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. 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. We are working to establish a robust network of providers. Please utilize the resources below to enroll as a Health First Colorado International Board Certified Lactation Consultant (IBCLC), Certified Lactation Counselor (CLC), or Certified Lactation Educator (CLE). A callout box states: "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](mailto: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. 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. Refer 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 note at the bottom states: "Click on the [Provider Enrollment Portal](#) to be guided to the Health First Colorado Lactation Consultant, Lactation Counselor/Educator, or Lactation/Doula Professional Group application. Provider enrollment forms can be found on the [Provider Forms web page](#) under the 'Provider Enrollment & Update Forms' heading."

## Lactation Enrollment Quick Guide

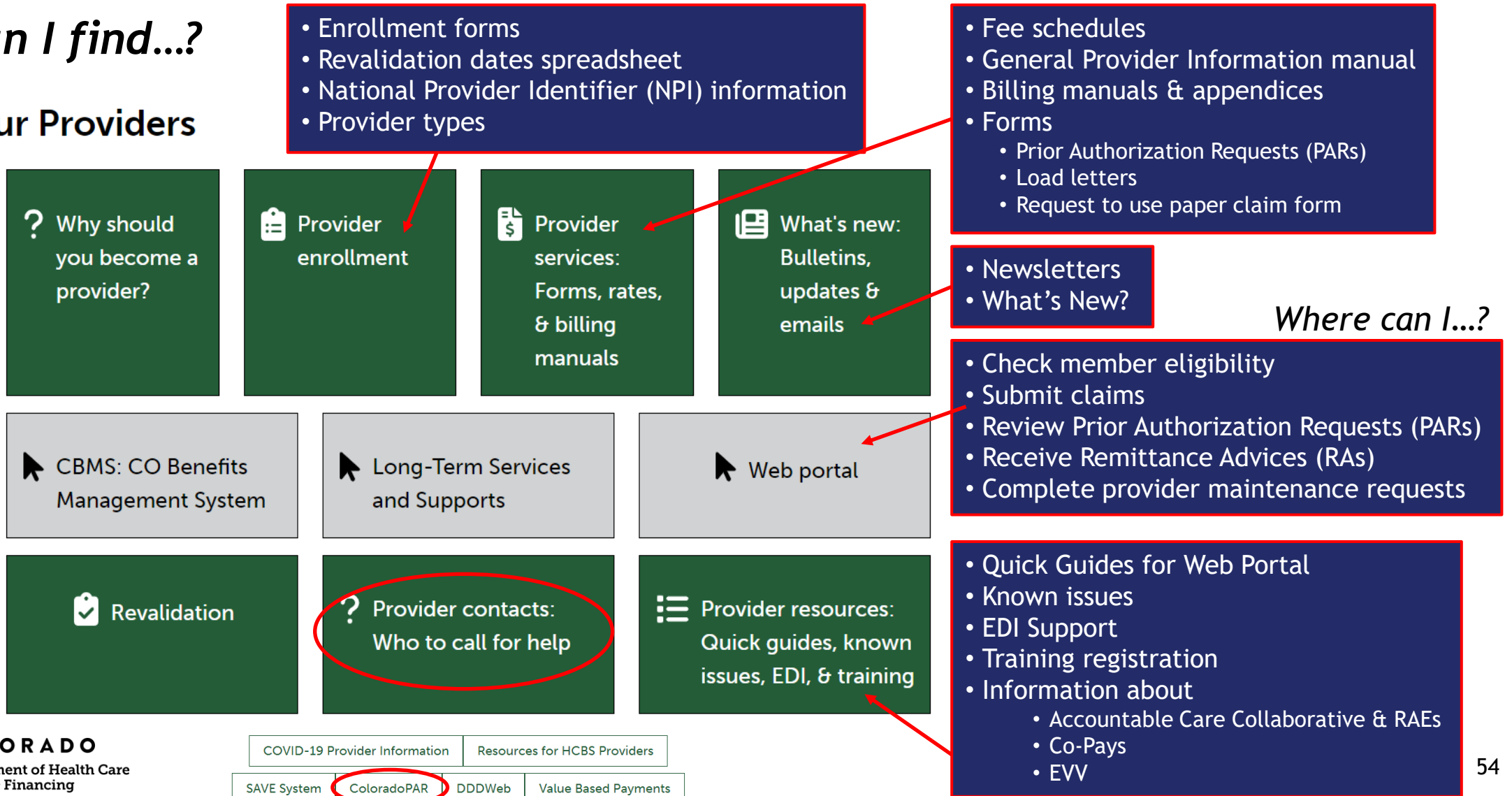


The screenshot shows the "2025 Lactation Enrollment Quick Guide" from the Colorado Department of Health Care Policy & Financing. The header includes the state logo, the department name, and a search bar. The main heading is "2025 Lactation Enrollment Quick Guide". The text explains that the guide provides steps to become an approved Health First Colorado (Colorado's Medicaid program) and Child Health Plan Plus (CHP+) lactation provider. The guide is organized into four 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. Each step includes detailed instructions and links to relevant resources. For example, Step 1 mentions that a Type 1 NPI will be required when registering as an individual lactation provider, and a Type 2 NPI will be required when registering as a Lactation/Doula Professional Group. Step 2 mentions that provider enrollment forms can be found on the [Providers Forms web page](#) under the "Provider Enrollment & Updates Forms" heading. Step 3 mentions that once steps 1 and 2 are complete, the provider can complete the lactation provider application online. Step 4 mentions that after submitting the application, it will trigger a request for a background check. The guide also includes a section for "Fingerprinting" and a "Learn more by visiting" section with the link [hcpf.colorado.gov/lactation-support-services](https://hcpf.colorado.gov/lactation-support-services).

# hcpf.colorado.gov/our-providers

*Where can I find...?*

**For Our Providers**



*Where can I...?*

# Thank you!