

## **Frequently Asked Questions (FAQs): Providing Lactation Benefits through Health First Colorado (Medicaid)**

**What is the implementation timeline for the lactation support services benefit?**

The lactation support services benefit go-live date is scheduled for December 1, 2024.

**What are lactation support services?**

Lactation support services include education, counseling, and assistance for common breastfeeding issues, along with skilled, evidence-based care for more complex lactation issues.

**How can a lactation provider be reimbursed for lactation support services provided to Child Health Plan Plus (CHP+) members?**

CHP+ billing differs slightly from Health First Colorado. All CHP+ providers must be contracted with a CHP+ Managed Care Organization (MCO) and enrolled in the Colorado interChange to be eligible for reimbursement for services delivered to CHP+ members. Providers should submit claims to the MCO once a CHP+ member is enrolled into an MCO. Refer to the [CHP+ provider contracting and enrollment web page](#) for further guidance.

**Who is eligible for lactation support services?**

A member must be pregnant, postpartum, or a pediatric member who is breastfeeding to be eligible for lactation support services in accordance with [10 CCR 2505-10 8.732.8.A](#).

**Is there a limit to the number of lactation support visits or the length of visits?**

No. There are no limits on the amount, duration, or scope of the services.

**Are group classes allowed? For group billing, does everyone in the group need to be a Medicaid client?**

Yes. Lactation support services can be provided in a group setting in accordance with [10 CCR 2505-10 8.732.10.B](#). Not all participants in the group need to be members of Health First Colorado, but a claim for payment may only be submitted for each enrolled Health First Colorado member who received services in the group session. Group support services must be billed according to the instructions found in the [Lactation Support Services billing manual](#).

## Can lactation support services be provided in a member's home?

Yes. Providers may provide lactation support services in a variety of settings including the member's home. The home setting should be indicated on the claim using the Place of Service code '12'.

## Are lactation support services allowed to be provided via telemedicine?

Yes. Telemedicine service delivery is allowed. Place of Service codes '02' or '10', along with an additional procedure modifier code ('FQ', 'FR', '93', or '95'), must be indicated on the claim when services are provided via telemedicine.

## Is a recommendation from a healthcare provider required to provide services to a member?

Yes. Lactation support services are provided as preventative services and require a recommendation by a physician or other licensed practitioner of the healing arts in accordance with [42 CFR 440.130\(c\)](#). Refer to the [Lactation Support Services billing manual](#) for further guidance.

## What codes will be available to bill for lactation support services?

Lactation support services will be covered under the Healthcare Common Procedure Coding System (HCPCS) procedure code S9443 with either the 'U1' modifier for individual settings or the 'U2' modifier for group settings and one (1) of eight (8) modifier codes (U3, U4, U5, U6, U7, U8, U9, UA) to indicate the number of minutes spent providing direct contact services to the member. Enter a quantity of one (1) unit in the unit field on the claim. Refer to the [Lactation Support Services billing manual](#) for further guidance.

## What is the reimbursement rate for lactation support services?

The reimbursement rate for Lactation Support Services varies based on the combination of modifiers used. Rate and procedure codes are on the [Provider Rates and Fee Schedule page](#).

## How do we re-submit previously denied lactation support services claims for Explanation of Benefits (EOB) 2022?

If a claim was denied previously for EOB 2022, providers may update denied claims with the new modifiers and resubmit electronically as new claims.

## As an International Board Certified Lactation Consultant, can I enroll as a Health First Colorado provider?

Yes. International Board Certified Lactation Consultants (IBCLCs) with current certification by the International Board of Lactation Consultant Examiners (IBCLE) have the option to enroll in Health First Colorado as a billing individual or individual within a group. If you

enroll as a billing individual you can submit claims for yourself and receive payment directly from Health First Colorado. If you enroll as an individual within a group and affiliate with an existing group, the group submits claims on your behalf and pays you directly.

### **As a Certified Lactation Counselor or Certified Lactation Educator, can I enroll as a Health First Colorado provider?**

Yes. Certified Lactation Counselors (CLCs) with current certification by the Academy of Lactation Policy and Practice, Inc. (ALPP) and Certified Lactation Educators (CLEs) with current certification by the Childbirth and Postpartum Professional Association (CAPP) can enroll as a Health First Colorado provider as an individual within a group. The individual within a group enrollment type is an individual who renders service but does not bill First Health Colorado directly. The individual must be associated with a group that submits claims on their behalf and the group pays the CLC/CLE directly.

### **I'm an International Board Certified Lactation Consultant. Can I enroll as both a billing individual and an individual within a group?**

No. An individual is allowed only one type of enrollment. What you can do is enroll as a billing individual and then a group can add you as an affiliate. This way you can provide services to members either as part of a group or individually. Enrolling as an 'individual within a group' type will preclude you from being able to bill claims for your services, and you will be dependent on your affiliated group to bill claims for the services you provide.

### **We are a group of lactation providers. How do we enroll?**

The group/organization can enroll as a Lactation/Doula professional group (Provider Type 72). This billing provider type must have at least one IBCLC or Doula affiliated with the group, however CLCs and CLEs are allowed to be affiliated with the group as well. It is used as a billing provider type for a group practice of lactation support service providers and/or Doulas.

### **I'm an International Board Certified Lactation Consultant who owns my own lactation practice and also works for another group providing lactation services. How can I enroll as a Health First Colorado provider?**

A provider's enrollment type is dependent on how income is reported (Federal Employer Identification Number [EIN] or Social Security Number [SSN]).

If income is reported using the organization's EIN, the Lactation Consultant will have two separate enrollments. One will be for the group/EIN (Lactation/Doula Professional Group - Provider Type 72) and the other will be for the individual within a group enrollment using their SSN (Lactation Consultant - Provider Type 70). The Lactation Consultant may associate with one or more groups to provide services.

If income is reported through SSN a Lactation Consultant could enroll as a Billing Individual (BI). A BI can bill directly for themselves and will receive direct payment under the SSN. Once they have an approved enrollment, an enrolled group can add them to their affiliated providers and then their NPI can be reported as the rendering provider for that group.

### **I am both a Doula and a Lactation Provider. Can I enroll in Health First Colorado as both provider types and bill for both doula and lactation services?**

Enrolled lactation service providers (IBCLC, CLC, or CLE) or doula providers may not be enrolled as two different provider types under the same Social Security Number (SSN). Doula and lactation cross-billing options are available. You can choose to enroll as either a lactation service provider or a doula provider, allowing you to provide both lactation and doula services.

Enrolled doula providers who meet IBCLC, CLC, or CLE qualifications per 10 C.C.R. 2505-10 8.732.9 may provide lactation support services without separate provider type 70 or 71 enrollment.

Enrolled lactation support service providers (IBCLC, CLC, or CLE) who meet doula qualifications per 10 C.C.R. 2505-10 8.734.4 may provide doula services without separate provider type 79 enrollment.

For additional information, please refer to the [billing manual for doula and lactation support services](#).

### **How do I become an approved Health First Colorado Provider?**

Please refer to the [Lactation Provider Enrollment Quick Guide](#) for detailed enrollment steps. Visit the Health Care Policy and Financing (HCPF) [Provider Enrollment web page](#) for more information on becoming a Health First Colorado provider. The [General Quick Guide](#) page contains important information for enrollment instruction and web portal use.

### **Do lactation providers have to be supervised by a licensed provider?**

International Board Certified Lactation Consultants may provide lactation support services without supervision in accordance with [10 CCR 2505-10 8.732.9.B.1](#).

Certified Lactation Counselors and Certified Lactation Educators may only provide lactation support services under the general supervision of an enrolled Physician, Physician Assistant, Advanced Practice Nurse, Certified Nurse Midwife, or International Board Certified Lactation Consultant in accordance with [10 CCR 2505-10 8.732.9.B.2](#).

Other types of providers (i.e. Physicians, Physician Assistants, Advanced Practice Nurse, and Certified Nurse Midwives) may provide Lactation Support Services in accordance with supervision requirements specified in their professional scope of practice.

### **Does the supervising provider need to be on-site under general supervision?**

The supervising provider may not be on-site but is immediately available via telephone or other electronic means to provide assistance or direction through the performance of service in accordance with [10 CCR 2505-10 8.200.1.A](#).

### Why do I need a National Provider Identification Identifier (NPI)?

Lactation providers are required to have an NPI, which is a unique 10-digit identification number for covered healthcare providers obtained from the National Plan and Provider Enumeration System (NPES) in accordance with [45 CFR 162.410](#). Individual practitioners, organizations, and individuals that are part of a group all need an NPI.

Individual practitioners and individuals who are part of a group typically have a Type 1 NPI. Lactation organizations usually have a Type 2 NPI.

Part of the information you need to apply for an NPI includes a taxonomy code. The taxonomy code for a Lactation Consultant is Registered Nurse, Lactation Consultant (163WL0100X) or Lactation Consultant, Non-RN (174N00000X). The taxonomy code for a Lactation Counselor/Educator is Specialist (174400000X).

### Are Lactation Consultants, Lactation Educators, and Lactation Counselors required to carry liability insurance?

Yes. Liability or professional insurance is required.

### Is a background check and fingerprinting required for Lactation Consultants, Lactation Educators, and Lactation Counselors to enroll as a provider?

Yes. These provider types have been designated as high-risk. This requires individuals to submit to fingerprint criminal background checks. Please visit the [Provider Enrollment web page](#) for more information on fingerprinting. Scroll to the bottom of the web page under Enrollment FAQs and then fingerprinting.

### Is a site visit required for Lactation Consultants, Lactation Educators, and Lactation Counselors to enroll as a provider?

Yes. Site visits are required of providers designated as high-risk. Typically, these site visits are conducted virtually with our fiscal agent, Gainwell Technologies to ensure that the information submitted to the Department by a provider is accurate and to determine compliance with federal and state enrollment requirements. Once your application has been submitted, the fiscal agent will contact you via email within a couple of weeks to arrange the site visit. The site visit lasts about 10-15 minutes and is done remotely by video. During the site visit, the fiscal agent will verify certain aspects of the enrollment.

### As an International Board Certified Lactation Consultant billing individual, how and when will I be reimbursed for my services?

Once an International Board Certified Lactation Consultant has completed registration and begun to provide services, they will submit electronic claims through the Medicaid Provider Web Portal. Reimbursement will occur on a fee-for-service basis. Claims must be submitted within 365 days of the date of service to receive payment. A successful claim submission that does not require additional review or corrections will typically be paid within about two weeks of receipt. The [General Quick Guide](#) page contains important information for enrollment instruction and web portal use, including information on using the portal for claim submission and viewing claim payments/denials.

### How can I confirm the member is enrolled in Medicaid?

Lactation providers should always confirm members are enrolled in Health First Colorado before providing services. During a standardized intake process, lactation providers can capture member contact information, including the Medicaid ID number. The Medicaid ID number is used to verify eligibility. Once a lactation provider is enrolled as a Health First Colorado provider, they can check for eligibility through the Provider Web Portal. More information about verifying a member's eligibility and enrollment in Health First Colorado is available here: <https://hcpf.colorado.gov/verifying-eligibility-quickguide#memElig>.

### When we bill for lactation support services do we bill for the lactating member and breastfeeding child separately for each visit?

No, only one claim should be billed per visit. Both the lactating member and the breastfeeding child must not have claims submitted for the same service and the same date of service. 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. Refer to the [Lactation Support Services billing manual](#) for further guidance.

### Could I be audited by Medicaid?

Yes. All Health First Colorado providers are subject to auditing. Lactation providers must maintain clear, up-to-date records that substantiate the claims they have submitted for payment. Good record management will reduce the risk of delays in the audit process and possible financial penalties.

### How do I maintain client confidentiality?

Maintaining client confidentiality is an important part of effective records management. Lactation providers should choose a secure records management system that meets federal and state data security requirements. This may include locked storage for paper charts, restricted access to electronic data management systems, firewalls to protect Protected Health Information (PHI), and good practices to avoid sending PHI via email or other insecure means.

### I don't see my question answered here. Who can I contact for assistance?

For general questions, contact HCPF at [hcpf\\_maternalchildhealth@state.co.us](mailto:hcpf_maternalchildhealth@state.co.us). After provider enrollment opens, if you need assistance with enrollment, provider maintenance, revalidation, or billing, visit the [Provider Contacts web page](#) for a list of resources.