

Medicaid Reimbursement for Doula Services Benefit Resources, Next Steps & FAQs



NEW YORK COALITION FOR DOULA ACCESS

About this document: The information shared in this document is up to date as of 2/14/2024 and is intended to compile and summarize relevant resources for doulas and community members interested in the New York State Medicaid Reimbursement Doula Services Benefit. Content is sourced from [NYS DOH Town Halls](#), [eMedNY](#), and share-outs from DOH representatives at monthly Coalition and subcommittee meetings. NYCDA Leadership strives to provide updated information about the benefit and is not responsible for any mistakes or misrepresentations in this document.

THE STATUS OF THE BENEFIT

Federal Public Notice (FPN): Posted by government agencies, FPNs alert members of the public of the opportunity to submit feedback on proposals *before* a rule or law is made. In this case, the public is invited to submit feedback on the State Plan Amendment for the Medicaid Reimbursement for Doula Services Benefit. The FPN was posted 12/13/23.

The period to submit public comment starts when the FPN is published and will end when federal approval is granted.

State Plan Amendment (SPA): States planning to make changes to their Medicaid programs must submit SPAs to the Center for Medicare and Medicaid Services (CMS) for review and approval. The SPA for the Doula Services Benefit was advanced to CMS for approval on 12/28/23. **NYS DOH has indicated that the benefit is planned to go-live on 3/1/2024.**



Key Area for Public Comment

In this guide, the speech bubble icon indicates key details of the benefit about which the public can provide feedback.

Public Comment Period:

Starts 12/13/23 | Ends: Date of CMS approval

Submit Public Comment to:

spa_inquiries@health.ny.gov

Federal Public Notice:

https://dos.ny.gov/system/files/documents/2023/12/121323_0.pdf

State Plan Amendment:

https://www.health.ny.gov/regulations/state_plans/status/non-inst/original/docs/os_2023-12-28_spa_24-03.pdf

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WHAT DOULAS CAN DO TO PREPARE

Review the SPA & Submit Public Comment: Doulas have a critical part to play in shaping and informing the benefit. Your experiences and input matter. Without feedback on the realities of the doula's role, the state risks implementing a benefit that will not serve the you, and by extension, the families on Medicaid that stand to benefit from your services. For guidance on how to frame your public comment, NYCDA put together a template.

- View and download NYCDA's SPA feedback template: [SPA Public Comment Sample Language](#)

Apply for a National Provider Identifier: All NYS Medicaid-enrolled providers are required to have a National Provider Identifier (NPI). Doulas participating in this services benefit are considered Medicaid providers. To learn more about this standard, visit the [CMS NPI webpage](#). NPIs are issued through the National Plan & Provider Enumeration System (NPPES). You can apply for an NPI on the [NPPES website](#). The turnaround for receiving an NPI is quick; usually within 48 hours.

- To apply: <https://nppes.cms.hhs.gov/#/>
- NPI application instructions: https://nppes.cms.hhs.gov/assets/How_to_apply_for_an_NPI_online.pdf

New York State Medicaid Enrollment Form: The Medicaid enrollment form is standard for all NYS enrolled providers. Doulas can find additional guidance on how to complete the form on eMedNY (NYS' electronic Medicaid system which houses enrollment, provider manuals, claims & processes guidance, and more.) NYS DOH offers New Provider / New Biller trainings and will release additional enrollment guidance specific for doulas. DOH will work to prevent a backlog, but doulas should expect enrollment approval to take 90-180 days. If a doula submits all requirements and demonstrates that, as of go-live, they meet all qualifications, they will be approved as of 3/1/2024, and services from that date forward will be covered.

- eMedNY Trainings: <https://www.emedny.org/training/>
- New York State Medicaid Provider Enrollment Form: https://www.emedny.org/info/ProviderEnrollment/ProviderMaintForms/43680_1_PRACT_FORM_PractitionerEnrlForm.pdf

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WHAT DOULAS CAN DO TO PREPARE CONT'D

Training and Work Experience Pathways: In addition to core requirements, NYS DOH proposed two pathways* to enrollment in the services benefit: one for doulas with a certain amount of work experience, and one for those that have received a certain level of training.

Doulas are encouraged to consider what pathway they'd like to pursue and to gather documentation to satisfy their pathway's criteria, e.g., skills and training certifications, testimonials, insurance.

Proposed Criteria



CORE REQUIREMENTS FOR ALL DOULAS

- Basic HIPAA training
- Adult & Infant CPR
- Age 18 or older
- Liability Insurance

TRAINING PATHWAY

- 24 hrs minimum training in all required competencies
- Provide doula support at 3 births minimum

WORK EXPERIENCE PATHWAY

- 30 births or 1000 hrs of doula experience within the last 10 years
- Testimonials of doula skills in prenatal, labor, and postpartum care

TRAINING PATHWAY COMPETENCIES:

Core Competencies (20 hrs training):

- Foundations on anatomy of pregnancy and childbirth
- Labor support techniques and nonmedical comfort measures
- Common medical interventions: risks, benefits, and decision-making
- Prenatal and postpartum education and support
- Lactation support, education and infant feeding
- Scope of practice

Broader Competencies (4 hrs training):

- Cultural awareness / humility and cross-cultural communication
- Health equity in medical field, especially reproductive health
- Person-centered and trauma-informed care
- Community-based knowledge and facilitating connection to resources

*After satisfying the core requirements for all doulas, only one pathway (training or work experience) is required for enrollment in the services benefit.

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AFTER THE BENEFIT GOES LIVE

Fee for Service: In the first six months, billing will take place as Fee for Service (FFS). This will help Medicaid Managed Care (MMC) organizations build the systems to reimburse doulas in a timely, efficient manner. Billing FFS also means that any family on Medicaid can receive doula services during this period. **MMCs are encouraged to match or exceed the FFS rate but can negotiate a lower or higher rate with individual providers.**

NYS Community Doula Directory: NY Legislators passed Assembly Bill A5435A, directing the state to establish a community doula directory for those serving Medicaid patients. All doulas seeking Medicaid reimbursement must register in the directory, which will be publicly available. Registration is free. DOH will release additional guidance on how to register when the benefit goes live.

- For reference, view the current Erie County Pilot doula directory: https://www.health.ny.gov/health_care/medicaid/redesign/doulapilot/index.htm



Proposed Criteria

REIMBURSEMENT RATES

New York City (NYC): Up to \$1500

Rest of State (ROS): Up to \$1350

Service	Visit Allowance	Per Visit Reimbursement	Percent of Total Reimbursement	Amount of Total Reimbursement
Perinatal Service*	8 visits (30 minute minimum)	NYC: \$93.75 ROS: \$83.37	50%	NYC: Up to \$750 ROS: Up to 675
Labor & Delivery**	1 encounter	NYC: \$750 ROS: \$675	50%	NYC: \$750 ROS: \$675

* Prenatal or postpartum doula support

** In-person doula support during labor and birth



Visit [our website](#) to subscribe to NYCDA emails or become a coalition member

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AFTER THE BENEFIT GOES LIVE CONT'D

Working with MMCs: The statewide benefit requires that MMCs create a provider network that's big enough to meet demand. To meet “[network adequacy](#)” requirements, MMCs must enroll doulas as providers. NYS DOH is responsible for communicating benefit updates to MMCs. Plans will be asked to have a point person and to maintain an up-to-date contact list, but this info may not be immediately available upon go-live. Doulas can work individually or organize collectively to speak directly with MMCs for points of contact for contracting and reimbursement. **MMCs can set additional credentialing requirements and may ask for additional documentation.**

Questions to Ask MMCs & Considerations:

- What are the plan's credentialing requirements?
- What documentation is required to satisfy a claim, and where will that be captured / stored?
- How long does it take to process and pay a claim?
- Is your (the doula's) documentation HIPAA secure?

Resources that will be published on eMedNY:

- **Medicaid Update article** – announces benefit details and informs providers of up-to-date changes in the Medicaid Program.
- **Medicaid Doula Services Provider Manual** – outlines specific rules governing the provision of your care and service to Medicaid recipients, including billing instructions and pertinent procedure codes and fee schedules. **Guidance will include new billing codes and rates.**



Proposed Criteria

ENROLLMENT REVALIDATION

- Attestation to completion of continuing education in required competencies
- CPR Requirements

GENERAL RECOMMENDATIONS

- Encouraged to take mandated reporter training
- Review Office of Children & Family Services resources

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ERIE & KINGS COUNTY DOULAS

Pilot Transition to Statewide Medicaid Coverage: The Erie County Doula Pilot will end on 2/29/2024. Enrollments will automatically extend to 2/28/2025 for all pilot doulas with active enrollment (including those who enrolled in Kings County) however, all Medicaid-enrolled doulas are required to revalidate according to the updated guidelines. Updated guidance will be included in the Doula Service Provider Manual. **Starting 3/1/2024, all Medicaid doula services provided by Medicaid-enrolled doulas will be reimbursed using new billing codes at the updated reimbursement rates.**

STAY INFORMED

Subscribe to Medicaid Updates: All formal announcements, effective dates, and updates to the NYS Medicaid doula services benefit are published via Medicaid Updates. Medicaid doula services providers are expected to follow updated guidance.

- To subscribe to Medicaid updates, email: medicaidupdate@health.ny.gov

NYS DOH Doula Service Listserv: NYS DOH communicates updates on the doula services benefit, including opportunities for stakeholder engagement, via a listserv. You can also submit informal questions to the NYS Office of Health Insurance Programs via this contact.

- To subscribe to the listserv or submit questions, email: doulapilot@health.ny.gov

NYS Medicaid Doula Services Website: NYS DOH hosts public Town Hall meetings to share updates, educate stakeholders, and receive public input on the services benefit.

- DOH Town Halls:
https://www.health.ny.gov/health_care/medicaid/program/doula/index.htm

Review Doula Pilot Guidance: Review guidance on the doula pilot to get familiar with eMedNY and NYS Medicaid provider enrollment. **This guidance will be updated for the statewide benefit and is to be reviewed as a reference only.**

- Link: <https://www.emedny.org/info/ProviderEnrollment/doula/index.aspx>

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Frequently Asked Questions

How is my SPA feedback taken into consideration?

The [CMS Rulemaking webpage](#) states: A "proposed rule" or proposed regulation announces CMS' intent to issue a new regulation or modify an existing regulation. By law, anyone can participate in the rulemaking process by commenting in writing on the regulations CMS proposes. **CMS encourages public input and carefully considers these comments before it develops a final regulation.** Review [NYCDA's SPA feedback template](#) for ideas on submitting public comment.

Is NYCDA still advocating for higher reimbursement rates?

Yes. One of NYCDA's core goals is to advocate for a living wage through Medicaid reimbursement rate for doulas. We continue to push for a higher statewide rate, recognizing there are many out-of-pocket expenses and other hidden costs for doulas. We consider the benefit a starting point, but aim to set standards for a thriving wage for doulas throughout the country.

What is the deadline to enroll as a NY Medicaid-enrolled provider?

There is no deadline for doulas to enroll as Medicaid providers. Enrollment happens on a rolling basis and will remain open as long as doula services are a statewide benefit. The benefit go-live date is targeted for early March. Review our [Stay Informed](#) resources ensure you're receiving the most up-to-date information from NYS.

What is NYCDA?

Founded in 2011, NYCDA is a state-wide coalition of doulas and supportive allies focused on increasing access to doula care in underserved communities and improving the integration of doulas as valued members of the maternal healthcare team. NYCDA's current priorities are to establish an equitable Medicaid reimbursement structure for doulas in New York and to create a set of standards for a doula-friendly hospital designation.

Visit our [website](#) or email us (nycda@healthleadsusa.org) to learn more about our work, subscribe to our emails, or become a coalition member.