

Guide to Medicaid Enrollment 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 10/10/2024 and is intended to compile and summarize relevant resources for doulas and community members interested in the New York State Medicaid Doula Services Benefit. Content is sourced from New York State Department of Health (NYS DOH) [public meetings](#), [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

State Plan Amendment (SPA): Services for the benefit were effective as of 3/1/2024. The SPA 24-0003 for Doula Services received CMS approval on March 25, 2024, which officially opened billing and claims processing, and released the Provider Manual.

- NYS SPA 24-0003: https://www.health.ny.gov/regulations/state_plans/status/non-inst/approved/docs/app_2024_03_25_spa_24-03.pdf

Medicaid Update Article – announces benefit details and informs providers of up-to-date changes in the Medicaid Program.

ENROLLING AS A MEDICAID PROVIDER

The following pages outline the steps and criteria required to become a Medicaid enrolled provider of doula services in New York State. A checklist for doulas to get a high-level view of the process links each step to an area of this document that provides additional detail, tips and tricks, and links. This guide is meant as a starting point and should not be considered a comprehensive resource for the benefit. Doulas should refer to the Doula Services Provider Manual for complete information and guidance, and to eMedNY's doula provider enrollment page for relevant forms, and instructions for their completion and submission.



What is NYCDA? Visit [our website](#) to learn more, subscribe to NYCDA emails or become a coalition member!

ENROLLMENT CHECKLIST

Getting Started -

- Apply for a National Provider Identifier (NPI)
- Review the Medicaid Doula Services Provider Manual
- Visit the eMedNY website and download Doula Enrollment Instructions, familiarize yourself with the webpage resources
- Attend a NYS DOH Enrollment Informational Session – *optional*

Enrollment Pathways -

- Ensure you meet the core enrollment requirements for all doulas
 - Compile documentation for core enrollment requirements
- Determine your enrollment pathway (training or work experience)
 - Compile required documentation for your pathway

Enrollment Form & Tips and Tricks -

- Complete the New York State Medicaid Provider Enrollment Form
- Schedule a 1:1 Enrollment Support Session with NYS DOH – *optional but highly recommended*
- Use the Sample Practitioner Form to screen your application for common mistakes (available on eMedNY)
- Assemble all required documents (refer to pg. 2 of the Doula Enrollment Instructions)
- Wait to sign and date the ETIN form until witnessed by a notary
- Create and keep a copy of your application for your records
- Mail all application forms in the same envelope (including EFT form for new applicants)
- Mail to address listed on eMedNY (standard and expedited options)

Doula Directory –

- Complete and submit the electronic form for the NYS Doula Directory

If your application is approved, you will be notified by mail. The following pages address what to do if your application is returned due to an error.

KEY RESOURCES



Medicaid Doula Services Provider Manual – Outlines specific rules governing the provision of your care and service to Medicaid recipients, including reimbursement instructions, pertinent procedure codes, fee schedules, and new billing codes and rates.



eMedNY Doula Provider Enrollment Web Page – Houses materials and instructions on provider enrollment, policy guidelines, fee schedules, and billing guidance. Scroll down and expand menus for step-by-step application information and downloadable forms.



NYS DOH Doula Services Website – Compiles information and guidance for doulas and Medicaid members interested in the benefit. The public meeting schedule, provider enrollment and billing support sessions, enrollment videos, information on Medicaid Managed Care plans, and general background on the benefit are available at this site.

ENROLLING AS A MEDICAID PROVIDER

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



Check out our FAQs and Glossary for top questions and common terms used throughout this guide.



ENROLLING AS A MEDICAID PROVIDER

NYS Medicaid Enrollment Form: Doulas can find guidance on how to complete the enrollment form on eMedNY and the NYS Doula Services website. Doulas should expect enrollment approval to take 90-120 days. **NYS DOH currently offers voluntary, virtual Enrollment Informational Sessions and 1:1 Enrollment Support Sessions.** Doulas are encouraged to take advantage of these resources because DOH representatives will offer personalized support to ensure materials meet required standards and assist in correcting any errors that could slow down the approval process. There is no limit to how many 1:1 support sessions you can attend.

- eMedNY Provider Enrollment Form & Guidance:
<https://www.emedny.org/info/ProviderEnrollment/doula/>
- NYS DOH Enrollment Support:
https://www.health.ny.gov/health_care/medicaid/program/doula/overview.htm#b



Attending a 1:1 Support Session is highly recommended. Reviewing your application materials with the support of a DOH representative will prevent processing slowdowns caused by easily avoidable errors. If your application is returned due to errors, contact MaternalAndChild.HealthPolicy@health.ny.gov to let them know and to receive guidance on next steps.

Training and Work Experience Pathways: In addition to core requirements, there are 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. **After satisfying the core requirements for all doulas, only one pathway (training or work experience) is required for enrollment in the services benefit.** The next pages outline abbreviated lists of requirements for each pathway. For more detailed information, refer to pgs. 9-10 of the [Provider Manual](#).

CORE REQUIREMENTS FOR ALL DOULAS

- National Provider Identifier Number
- Adult & Infant CPR
- Review & comply with HIPAA
- Age 18 or older
- Liability Insurance
- NYS fee-for-service Doula Directory

Required Documentation:

- Attestation Form – Part A



ENROLLING AS A MEDICAID PROVIDER



Not sure where to start looking for liability insurance or CPR training? See our FAQ for resources and information.

TRAINING PATHWAY

- 24 hrs minimum training in all required core and broader competencies
- Provide doula support at minimum of 3 births

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

Required Documentation:

- Copy of doula training certificate(s) **or** a letter from the doula organization noting completion
- Attestation Form – Part B, Part B Addendum required **ONLY** if additional training completed to meet training pathway requirements.

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

Required Documentation:

- Attestation of support at either 30 births **or** 1000 hrs of doula experience in either a volunteer or paid capacity within the last 10 years
- Attestation Form – Part C; and
- Submission of 3 different client and/or professional recommendations using DOH templated forms (completed by clients or relevant professionals, respectively)

ENROLLING AS A MEDICAID PROVIDER



- All forms and templates required for doula enrollment are available on eMedNY.
- Forms can be filled out electronically, except on the lines that must be initialed or signed in ink.
- Submit all application materials together.

Only submit required documentation (additional docs that aren't required could delay the application process):

- Copies of CPR certification, HIPAA training, and liability coverage are not required.
- Do not fill out the Prior Conduct Questionnaire form unless needed.

Training Pathway Specific:

- Do not fill out Part B Addendum unless needed.
- Do not submit copies of certificates that do not fulfill training requirements.
- Do not submit original certificate(s) or letter(s).

GENERAL RECOMMENDATIONS

Refer to pg. 11 in the [Provider Manual](#) for NYS Office of Children and Family Services Guidance for Medicaid Doula Providers. Note that these are not requirements.

- Encouraged to take mandated reporter training
- Review Office of Children & Family Services resources
 - Self-directed online training
 - H.E.A.R.S Family Line
 - Mandated Reporter Resource Center

ENROLLMENT REVALIDATION

Enrolled Medicaid providers must revalidate every 5 years. [Click here](#) for revalidation specific to doulas enrolled via the pilot. Refer to pg. 10 for ongoing maintenance requirements, and pg. 19 for Revalidation of Enrollment in the [Provider Manual](#).

- Attestation to completion of 6 hrs of continuing education in required competencies
- Maintenance of CPR certification
- Maintenance of liability coverage

ENROLLING AS A MEDICAID PROVIDER

NYS Community Doula Directory: NY Legislators passed [Assembly Bill A5435A](#), directing the state to establish a community doula directory for those serving Medicaid patients. The directory compiles all NYS Medicaid Fee-for-Service Doula Services Providers and allows Medicaid clients to search and select doulas in their area. Doulas are required to complete the directory form electronically as part of the provider enrollment process and to update information as needed. Doulas must provide an email or phone number, and list only counties where they can physically serve clients. A doula is added to the doula directory when their provider enrollment application is approved.

- NYS Medicaid Fee-for-Service Doula Directory Form:
<https://forms.office.com/pages/responsepage.aspx?id=6rhs9AB5EE2M64Dowcg e51zlstbMxVZCpnBFzblM4pURDJVMkVaRjdEUDdNUlkwOTJONDlISVFKQy4u>
- NYS Medicaid Fee-for-Service Doula Directory:
https://www.health.ny.gov/health_care/medicaid/program/doula/directory/directory.htm



You've completed the steps required to enroll in the NYS Medicaid doula services benefit! If your application is approved, you will be notified by mail. If your application is returned due to errors, contact

MaternalAndChild.HealthPolicy@health.ny.gov to let them know and to receive guidance on next steps.

WORKING WITH MEDICAID MANAGED CARE

Fee-for-Service: Through March 31, 2025, doula providers are required to bill the state Medicaid program directly for doula services, through eMedNY. This was extended from December 31, 2024, to ensure [Medicaid Managed Care](#) (MMC) organizations have time to build the systems to reimburse doulas. Referred to as billing fee-for-service (FFS), this means that any family on Medicaid can receive doula services immediately, while on and after April 1, 2025, doula providers will be required to bill the client's MMC plan for covered doula services and will bill FFS only if the Medicaid member is enrolled in FFS. For more information on the transition, refer to pages 16-17 of the [Provider Manual](#).

- eMedNY Fee Schedule: <https://www.emedny.org/ProviderManuals/Doula/>

WORKING WITH MEDICAID MANAGED CARE

Contracting 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. **MMCs are encouraged to match or exceed the FFS rate but can negotiate a lower or higher rate with individual providers.** Plans have a doula point person and must maintain an up-to-date contact list. Doulas should outreach to plans in their respective counties and begin the contracting process. Doulas can work individually or organize collectively to speak directly with MMCs for contracting and reimbursement. **MMCs can set additional credentialing requirements and may ask for additional documentation.**

- MMC Information for Doulas:
https://www.health.ny.gov/health_care/medicaid/program/doula/overview.htm#g
- General MMC Information for Health Care Providers:
https://www.health.ny.gov/health_care/managed_care/providers/



Questions & Considerations for Doulas Contacting MMCs:

- 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?

WORKING WITH CLIENTS

Standing Order for Doula Services: Secured in the FY25 NYS Enacted Budget, a statewide standing order was approved by [NYS Commissioner of Health](#). Now in effect, this eliminates the need for a clinical provider to issue individual recommendations for pregnant, birthing, or postpartum New Yorkers who wish to receive doula services through the benefit. Doulas who sought clinical provider recommendations prior to when the order went into effect should maintain those records in case of audit.

- Non-Patient-Specific Standing Order for the Provision of Doula Services:
https://www.health.ny.gov/health_care/medicaid/program/doula/docs/2024-06_doula_standing_order.pdf



BILLING AND REIMBURSEMENT

Reimbursement Rates

Refer to pgs. 14-16 of the [Provider Manual](#) for perinatal and L&D encounter requirements.

Regional Differential:

- New York City (NYC) / 5 Boroughs: 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: \$84.37	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, NYS Medicaid Telehealth policy applies

** In-person doula support during labor and birth, extenuating circumstances apply

New Provider & Billing Support: New doula Medicaid providers are encouraged to attend informational sessions for new providers and billing support. Sessions are split into two parts: Part 1 is hosted by NYS DOH and addresses the provider manual, fee schedule, billing codes, and more. Part 2 is hosted on eMedNY and covers a variety of topics, including an overview of eMedNY, explanation of the 90-day regulation, billing options, overview of ePACES, Q&A, and more. Doulas can attend live sessions as scheduled, or reference past sessions as recordings.

- Billing Information Sessions for Doulas:

https://www.health.ny.gov/health_care/medicaid/program/doula/overview.htm#e



What is NYCDA? Visit [our website](#) to learn more, subscribe to NYCDA emails or become a coalition member!



ERIE & KINGS COUNTY DOULAS

Pilot Transition to Statewide Medicaid Coverage: The Erie County Doula Pilot ended on 2/29/2024. Doulas who participated in the pilot (including those who enrolled in Kings County) and are actively enrolled as Medicaid providers will not need to revalidate until 2/28/2025. For revalidation guidance specific to doulas who enrolled via the doula services pilot, refer to pg. 8 in the [Provider Manual](#). For instructions and forms for pilot doula revalidation, see the [eMedNY Doula Provider Enrollment webpage](#), under Requirements & Additional Forms.

As of 3/1/2024, all Medicaid doula services provided by Medicaid-enrolled doulas are reimbursed using new billing codes at the updated reimbursement rates.

STAY INFORMED ABOUT THE BENEFIT

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 Resources: NYS DOH provides key updates and resources on the doula services benefit through several outlets:

- **Listserv:** Stay informed about the benefit and opportunities for stakeholder engagement; to be added, email: doulapilot@health.ny.gov
- **Enrollment Support:** Submit informal questions and request support with applications returned for errors; email: MaternalAndChild.HealthPolicy@health.ny.gov
- **Public Meetings:** NYS DOH hosts virtual public meetings to share updates, educate stakeholders, and receive input on the services benefit: https://www.health.ny.gov/health_care/medicaid/program/doula/overview.htm#a
- **NYS DOH Doula Services Website:** For comprehensive information on the benefit, explore the State's website for the Medicaid doula services program: https://www.health.ny.gov/health_care/medicaid/program/doula/overview.htm



FREQUENTLY ASKED QUESTIONS

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 doula services are now a permanent statewide benefit. Review our [Stay Informed](#) resources ensure you're receiving the most up-to-date information from NYS.

What CPR Certification is accepted?

The Red Cross offers Adult & Infant CPR training and certification courses on a rotating basis that are accepted for enrollment in the services benefit. Use [this tool](#) to find courses in your area or attend a virtual session at your convenience.

As a doula, can I request a deposit from my Medicaid clients?

No. When you make the decision to provide doula services to clients who are Medicaid recipients, you agree to accept payment under the Medicaid program as payment in full for services rendered. This means you cannot [balance bill](#) Medicaid members, request or collect any reimbursement in addition to claims made under the Medicaid program, or make a private pay agreement to accept the Medicaid fee for your covered doula services, and then provide a different upgraded service (usually a service that is beyond the scope of the Medicaid program) and agree to charge the beneficiary only the difference in fee between two services in addition to billing Medicaid for the covered service. These activities are considered fraud. These regulations apply to all Medicaid providers.





FREQUENTLY ASKED QUESTIONS

Do I need liability insurance? What insurance companies are recommended?

Yes, doulas who are Medicaid providers are required to have liability insurance, and all [doulas should invest in liability coverage](#) regardless of whether you accept Medicaid clients. Insurance coverage protects you from the financial risk of litigation if a general or professional liability lawsuit is brought against you. For doulas interested in practicing outside of the clinical setting, [Alternative Balance Liability Insurance](#) covers doulas no matter where they are providing services, but a physician or midwife must be present for deliveries outside of a clinic or hospital. This company charges \$269.00 for general and professional coverage, annually.

As a Medicaid doula provider, do I need a provider recommendation for my clients?

As of June 10, 2024, the [NYS Commissioner of Health](#) has issued a standing order for all New Yorkers who are pregnant, birthing, or postpartum to benefit from receiving doula services. Under this order, doulas do not need to seek individual provider recommendations for their clients, making it easier for Medicaid families to access doula care. To remain in effect, the standing order must be renewed next year and would additionally require renewed approval by the Commissioner's successor if he were to step down.

WHAT IS NYCDA?

Founded in 2011, the New York Coalition for Doula Access 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.

GLOSSARY

Electronic Medicaid New York System (eMedNY) - The State's electronic Medicaid system which houses enrollment, provider manuals, claims and processes guidance, and more.

Electronic Provider Assisted Claim Entry System (ePACES) - A web-based application that allows providers to bill for services by requesting and receiving transactions, and to verify client Medicaid eligibility. Providers can manage HIPAA-compliant claims, claim inquiry and prior approval/Dispensing Validation System (DVS) transactions. ePACES is part of the New York State electronic Medicaid New York (eMedNY) system.

Fee-for-Service (FFS) – Fee-for Service is one of two methods used to pay Medicaid providers. Under FFS, a provider is paid for every Medicaid eligible service rendered to the recipient. In New York State, Fee-for Service payments are billed directly to the state Medicaid program through eMedNY.

Medicaid Managed Care (MMC) - Any health insurance plan or system that coordinates care through a primary care practitioner or is otherwise structured to control quality, cost and utilization, focusing on preventive care. With regards to billing, MMC plans receive a monthly payment for each enrolled Medicaid recipient and must ensure that enrollees have access to a comprehensive range of medical services. If enrolled in a managed care plan, most of the eligible medical services provided to the recipient should be covered by the monthly payment to the managed care plan and only in certain specified circumstances should FFS payments be made on behalf of the recipient.

Medicaid Provider - An eligible professional providing services to Medicaid recipients in the categories of community Medicaid, home care, and institutional care. In New York State, Medicaid pays doctors, hospitals, nursing homes, home care agencies and other providers directly, provided they have agreed to accept Medicaid clients and Medicaid payment as payment in full. Medicaid will not pay for services of a provider who has not registered in the Medicaid program. Providers are not required to participate in the Medicaid program. If they do, they must accept all Medicaid recipients as patients.

GLOSSARY

National Provider Identifier - The NPI is a unique identification number for covered healthcare providers. Covered healthcare providers and all health plans and health care clearinghouses must use the NPIs in the administrative and financial transactions adopted under HIPAA.

National Plan & Provider Enumeration System - The Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) mandated the adoption of standard unique identifiers for health care providers and health plans. The purpose of these provisions is to improve the efficiency and effectiveness of the electronic transmission of health information. The [Centers for Medicare & Medicaid Services](#) (CMS) has developed the National Plan and Provider Enumeration System (NPPES) to assign these unique identifiers.

State Plan Amendment - 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.