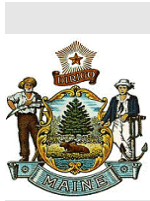


Janet T. Mills
Governor

Sara Gagné-Holmes
Commissioner



Maine Department of Health and Human Services
Office of MaineCare Services
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4/17/2025

Senator Ingwersen, Chair
Representative Meyer, Chair
Members, Joint Standing Committee on Health and Human Services
100 State House Station
Augusta, ME 04333-0100

Re: LD 1523 – *An Act to Improve Perinatal Care Through Expanded Access to Doula Services*

Senator Ingwersen, Representative Meyer and members of the Joint Standing Committee on Health and Human Services, thank you for the opportunity to provide information in opposition to LD 1523, *An Act to Improve Perinatal Care Through Expanded Access to Doula Services*.

This bill requires reimbursement under the MaineCare program for doula services. It also requires the Department of Health and Human Services (the “Department”) to establish an advisory committee to provide advice and make recommendations to the Department regarding doula services.

The Department agrees expanding doula services would provide additional prenatal, labor, and postnatal support to MaineCare members, and is already undertaking this work under a January 2025 significant federal award from the Centers for Medicare & Medicaid Services to the Office of MaineCare Services (OMS), called “Transforming Maternal Health” (TMaH). All participating state Medicaid agencies in the TMaH Model are required to cover, or have a concrete timeline to cover doula services by the end of 2027. Accordingly, OMS has established a timeline of planning and implementation activities to reimburse doula services, beginning with the establishment of a multidisciplinary, multisector, Statewide Doula Council in mid-2025. This Statewide Doula Council will essentially have two roles: 1) serve in the capacity of an advisory committee to MaineCare on establishing doula reimbursement and 2) be responsible for the identification of training and/or certification provider requirements and doula service delivery and coordination requirements.

In preparation for coverage in calendar year 2027 and with the input of the Statewide Doula Council, the Department will complete the necessary rate determination steps, request the appropriate federal approval, and conduct state rulemaking. Two Doula Implementation Consultants are scheduled to begin work with OMS beginning in May 2025 to advise on the planning and implementation activities required to reimburse doula services. Additionally, broader work will be funded by the federal award to design outreach and education to the community at large about doula coverage through MaineCare. Through the TMaH model, MaineCare currently has federal grant funding to pay for the rate setting component of this work and for the changes to the claims system. Actual coverage of doula services under MaineCare

will be contingent upon appropriation of funds by the legislature in the next biennial budget based on rate and policy decisions yet to come.

This bill does not align with the timing of the TMaH model, which addresses the issues identified in LD 1523, and would establish a committee structure duplicative of one already in place. The TMaH workplans, partner engagement, and financial resources are necessary for the successful implementation of MaineCare coverage of doulas. The Department encourages the committee to support the Department's rollout of doula services as a component of the TMaH Model in alignment with approved federal cooperative agreement timeline and with adequate appropriations.

In addition, the Department would like to note, while doula services are not currently independently covered in the Maine Medicaid state plan as professional services, MaineCare does allow certified birth or postpartum doulas who have completed a doula training program with relevant perinatal core competencies to fill the Patient Navigator role of the MaineMOM multidisciplinary care team. (MaineMOM is a team-based care model for maternity and Opioid Use Disorder treatment services; MaineCare Benefits Manual Ch. II, Section 89.)

Please feel free to contact me if you have any questions during your deliberation of this bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Probert", with a stylized flourish at the end.

Michelle Probert
Director
Office of MaineCare Services
Maine Department of Health and Human Services