

**MARYLAND MEDICAL ASSISTANCE PROGRAM**

**MCO Transmittal No. 158**

**Doula Transmittal No. 1**

**Hospital Transmittal No. 293**

**Free Standing Birth Centers Transmittal No. 3**

**Local Health Department Transmittal No. 12**

**October 17, 2022**

**TO:** Managed Care Organizations  
Doulas  
Hospitals  
Free Standing Birth Centers  
Local Health Departments

**FROM:** Sandra Kick, Director *Sandra E. Kick*  
Medical Benefits Management

**RE:** Doula Network Adequacy Standards for the Maryland HealthChoice Program

**NOTE:** **Please ensure that appropriate staff members in your organization are informed of the contents of this memorandum.**

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The Maryland Department of Health (MDH) has developed guidance for managed care organization (MCO) network standards for the doula provider type in the Maryland HealthChoice Program under the authority of 42 CFR § 438.206, which permits States to use quantitative or qualitative standards to determine network adequacy.

The quantitative network adequacy standards for doulas are outlined on the following page.

### Doula Network Adequacy Standards

<b>Geographical Region</b>	<b>Counties</b>	<b>Number of Doulas Required</b>
<b>Urban</b>	<b>Baltimore City</b>	<b>4 at minimum</b>
<b>Suburban</b>	<b>Anne Arundel, Baltimore, Carroll, Harford, Howard, Montgomery, and Prince George's</b>	<b>4 at minimum in each county</b>
<b>Rural: Eastern Shore</b>	<b>Caroline, Cecil, Dorchester, Kent, Queen Anne's, Somerset, Talbot, Wicomico, and Worcester</b>	<b>2 at minimum in the region</b>
<b>Rural: Southern Maryland</b>	<b>Calvert, Charles, and St. Mary's</b>	<b>2 at minimum in the region</b>
<b>Rural: Western Maryland</b>	<b>Allegany, Garrett, Frederick, and Washington</b>	<b>2 at minimum in the region</b>

Until the above standards are met, effective immediately, MCOs must enter into single case agreements (SCAs) with out-of-network doulas to render the covered benefit as required under 42 CFR § 438.206(b)(4). For purposes of this transmittal, out-of-network (OON) doulas are doulas who are not currently enrolled with Medicaid and would otherwise not be able to contract with an MCO to become an in-network provider. MDH will reevaluate the adequacy of doula enrollment and each MCO's doula network on an ongoing basis until the network adequacy standards are met.

MDH recommends MCOs primarily contract with doulas who are on a pathway towards full Medicaid enrollment and possess all required certifications in COMAR 10.09.39.02. However, MDH recognizes that SCAs may be necessary with doulas who may not have all of the certifications required. To that end, doulas with the following certifications may be contracted for OON arrangements:

- Birth in Color: Community Based Doula Certificate;
- Birthers United: Community Birth Doula Certificate; and
- Doula Trainings International: Full-Spectrum Doula Certification.

Doulas who have been approved by another State's Medicaid program, and by at least one of the approved certifications accepted by Maryland Medicaid, may also be contracted for SCAs.

MCOs who enter into SCAs must do the following:

- Confirm the doula has an individual NPI.

- Perform federal exclusion checks and verify an individual doula's training/certifications.
- Ensure out-of-network doulas operating with a SCA bill claims in accordance with the HealthChoice Doula Program Manual [found on our website](#).

Because this solution is being implemented in response to limited enrollment of doulas in Maryland Medicaid, MCOs are permitted to use the free agent flag on encounters for services delivered by out-of-network doulas contracted through SCAs.

As a reminder, the free agent process exists for special circumstances where a provider is not enrolled with Maryland Medicaid and not part of any MCO's network (e.g., out-of-state emergency providers). To ensure encounters for doula services are successfully submitted to MMIS, MCOs must add the out-of-network doula's NPI to the MCO network file and submit out-of-network doula encounters using the free agent flag for MMIS acceptance. This free agent process is intended to be available only on a short term basis. Doulas are still expected to enroll in Medicaid per normal requirements. Once network adequacy is found to be sufficient, only doulas enrolled in Medicaid will be able to continue to bill MCOs for services. An additional transmittal will be issued when network adequacy is found to be sufficient, indicating that the free agent process will be discontinued within ninety (90) days.

For any questions about this transmittal, please contact Sandy Kick, Director, Office of Medical Benefits Management, at [sandra.kick@maryland.gov](mailto:sandra.kick@maryland.gov) and copy [mdh.medicaidmch@maryland.gov](mailto:mdh.medicaidmch@maryland.gov).