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## PUBLIC COMMENT NOTICE

### Community Health Workers, Perinatal doula, and evidence-based home visiting services

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On April 27, 2021, Governor JB Pritzker signed the Healthcare Pillar bill, [PA 102-0004](#). This public act provides that Community Health Workers (CHWs), perinatal doula services, and evidence-based home visiting services shall be covered under the medical assistance program, subject to appropriation, for persons who are otherwise eligible for medical assistance.

The Department of Healthcare and Family Services is seeking public input on developing and implementing rules and is requesting the expertise of CHWs, doula program experts, doula training providers, practicing doulas, home visiting experts, Medicaid customers, and other stakeholders on the credentials necessary for CHWs, perinatal doula and home visiting services to be eligible for Medicaid reimbursement and the rate of reimbursement for CHWs, home visiting, and perinatal doula services. Public input will be collected orally during the public Equity and Quality Subcommittee meeting of the Medicaid Advisory Committee on December 8, 2021 and in writing electronically and by mail through December 31, 2021 as described below.

Public feedback could include:

- Provider type qualifications, including required certifications and/or training;
- How to define CHW, doula, and home visiting services, including:
  - Frequency of visits,
  - Components of the visit billed to Medicaid, and
  - Any maximum quantities or limitations on services;
- How to implement billing through enrolled Medicaid providers, including:
  - How to connect CHWs, doulas, and home visitors to enrolled Medicaid providers to bill on their behalf by listing the CHW, doula, or home visitor as the rendering provider, if they don't already have established relationships. Under this scenario:
    - The enrolled provider could hire the new provider types or contract with organizations that employ the new provider types;
    - The new provider types would leverage the enrolled providers' existing contracts with Medicaid MCOs and their billing expertise.
  - If the state should create a new provider type for CHW, doula, and/or home visiting organizations to enroll themselves rather than or as an alternative option to contracting with a currently enrolled Medicaid provider and if so:
    - How to keep the services connected to the Medicaid customer's care plan;
    - The additional time and training needed to teach organizations how to bill Medicaid fee-for-service and multiple managed care plans; and
    - The additional time and training needed to contract with Medicaid MCOs.
  - Other billing arrangements, such as billing through third party agents (TPAs).
- How rates and a rate methodology should be developed, including background information and justifications that could be submitted to the federal Centers for Medicare & Medicaid Services (CMS) when seeking approval for federal matching dollars;
- How to ensure Medicaid providers and understand CHW, doula, and home visiting services and the importance of their work;

- How to implement CHW, doula, and home visiting services in a managed care framework and in a way that provides enhanced services while minimalizing duplication as most Medicaid customers receiving the new services will be enrolled in managed care;
- How CHWs, doulas, and home visitors should interact with Medicaid MCO care coordinators;
- How to best ensure that Medicaid customers are aware of CHW, doula, and home visiting services as well as how to access them;
- How individuals can be connected to CHW, doula, and home visiting services, including referral processes and/or standards to determine the services are appropriate and necessary; and
- How doulas should interact with home visitors during the postpartum period;
- how to implement CHW, doula, and home visiting services in a way that promotes quality and coordination, advances equity, and is structured in a way that it qualifies for federal matching dollars through a State Plan Amendment (SPA); and
- Any other key implementation issues stakeholders want to raise to HFS.

The electronic public notice is posted on the HFS website at:

<https://www.illinois.gov/hfs/info/legal/PublicNotices/Pages/default.aspx>.

The non-electronic public notice may be viewed at:

- The Illinois Department of Healthcare and Family Services (HFS), Bloom Building, 201 South Grand Avenue East, Springfield, Illinois.
- The Illinois Department of Human Services (IDHS) local offices, except in Cook County. In Cook County, the notice may be reviewed at the Office of the Director, Illinois Department of Healthcare and Family Services (HFS), 401 South Clinton Street, 1st Floor, Chicago, Illinois.

HFS is accepting written public comments from November 10, 2021 through December 31, 2021. Those interested in providing input are asked to email feedback to the HFS web portal email address at [HFS.BPRA@illinois.gov](mailto:HFS.BPRA@illinois.gov) or mail their written input to:

Illinois Department of Healthcare and Family Services  
ATTN: Bureau of Program and Policy Coordination  
201 South Grand Avenue East 2FL  
Springfield, IL 62763

Public comments will be considered in the development of State Plan Amendments (SPAs) and administrative rules to implement CHW, perinatal doula, and home visiting services in the Illinois Medicaid program with federal matching dollars.