

DRAFT Proposed New Bulletin No. B-4.1XX

Concerning Coverage of Doulas in Health Benefit Plans

I. Background and Purpose

In 2024, the Colorado General Assembly passed Senate Bill 24-175 (SB 24-175) concerning coverage of doulas. The legislation requires the Division to determine whether this benefit would be subject to state defrayal and submit its determination to the U.S. Department of Health & Human Services (“HHS”).

The purpose of this bulletin is to clarify the Division's position regarding doula coverage for a covered person in accordance with SB 24-175, and to request information from carriers and other interested stakeholders.

Bulletins are the Division's interpretations of existing insurance law or general statements of Division policy. Bulletins themselves establish neither binding norms nor finally determine issues or rights.

II. Applicability and Scope

This bulletin is intended to provide guidance to all carriers that issue health benefit plans in 2026.

III. Division Position

Pursuant to Section 10-16-104(3)(e)(II), C.R.S., carriers are reminded that coverage of doulas was required for large group plans issued or renewed on or after July 1, 2025 or twelve months after the Department of Health Care Policy & Financing (HCPF) submitted its request to HHS to cover such services, whichever is later. HCPF submitted that request on May 30, 2024, and guidance regarding the Health First Colorado doula benefit program is available on HCPF's website at the following link: <https://hcpf.colorado.gov/doula-manual>. Therefore, carriers offering large group plans were required to provide coverage for doulas since May 30, 2025, subject to the conditions in SB 24-175.

Section 10-16-104(3)(e)(III), C.R.S., requires individual and small group plans to provide coverage for doulas if such services are “currently reimbursed when rendered by any other health care providers or covered as part of the maternity essential health benefit.” The statute requires the

Division to seek confirmation from HHS that the coverage does not require the state to defray the costs of coverage. The Division submitted a letter to HHS on February 27, 2025.

It is the Division's position that individual and small group plans must provide coverage for doulas for services that are either currently reimbursed by carriers when rendered by any other health care provider or are provided as part of the maternity essential health benefit. To determine the nature and scope of services included in such coverage, the Division requests that carriers and other interested stakeholders submit the following information, no later than November 30, 2025:

1. A description of all prenatal services that are within a doula's level of professional competence and are currently reimbursed by carriers when rendered by any other health care provider or covered as part of the maternity essential health benefit;
2. A description of all postnatal services that are within a doula's level of professional competence and are currently reimbursed by carriers when rendered by any other health care provider or covered as part of the maternity essential health benefit; and
3. A description of all labor and delivery services that are within a doula's level of professional competence and are currently reimbursed by carriers when rendered by any other health care provider or covered as part of the maternity essential health benefit.

Submissions should be sent to the following address: DORA_INS_RulesandRecords@state.co.us

IV. Additional Resources

- Colorado Benchmark Plan:
<https://doi.colorado.gov/insurance-products/health-insurance/aca-information/aca-benchmark-health-insurance-plan-selection>
- HCPF Doula Billing Manual:
<https://hcpf.colorado.gov/doula-manual>

V. History

Issued Month, Day, Year.