

From: [Melissa Dennis](#)
To: [HFS.BPPC](#)
Subject: [External] PA 102-0004 comment
Date: Tuesday, November 28, 2023 4:13:10 PM

As an Obstetrician/Gynecologist and the Chief Medical Officer at Partum Health, my mission has always been to improve birth outcomes and search for ways to make care equitable. The prospect of achieving this, in part, through accessible doula care is a very exciting opportunity, as the data showing benefits from continuous labor support and doula care is prevalent in the literature. I fully support providing perinatal doula services delivered by certified doulas. My hope in launching this program is to ensure there is an opportunity for individuals in the community to build the workforce. This can be achieved by reimbursing a fare and living wage for the doulas and reimbursing for telehealth, text, and phone sessions to increase access to care.

Dr. Melissa Dennis

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Melissa Dennis MD MHA FACOG
Chief Medical Officer, Partum Health
She/Her/Hers

Bureau of Program and Policy Coordination
Division of Medical Programs
Healthcare and Family Services
201 South Grand Avenue East
Springfield, IL 62763-0001

December 7, 2023

Dear, Illinois Department of Healthcare and Family Services (HFS):

Erie Family Health Centers is a federally qualified health center with 13 locations in Chicago, Evanston, and Waukegan, Illinois. Erie provides primary, behavioral, and oral health care services to over 88,000 patients across the age continuum as well as robust wrap around health services including case management and health promotion. Erie provides health care services to all, regardless of their insurance status, ability to pay or immigration status. Erie ranks in the top 10% of federally qualified health centers across the nation for quality of care. Erie is also in the top 1% of community health center deliveries and has the highest volume of deliveries in Illinois.

Erie thanks HFS for the opportunity to comment on the efforts to implement Article 175 of the Illinois Public Act 102-0004 and provides the following recommendations:

Training & Career Development: Erie supports the development of doula training pathways and the certification of doulas

Erie invests in the future of our staff by training a diverse and culturally competent community health workforce. Erie has meaningful and successful training programs that host over 300 providers and health care workers. To this end, Erie supports the development of doula training pathways and the certification of doulas as this would create new career development opportunities for Erie's Reproductive Health Promoters, Social Drivers of Health Navigators and other staff seeking to advance their education and skillset.

Collaboration and integration: Erie recommends the inclusion of rules that allow doula integration and communication with patients' medical homes. Erie also recommends that HFS consults with other medical providers throughout this process to include perspectives from everyone involved in patient care

Erie wants to underscore the importance of maximizing the value of this program by increasing the collaboration between doulas and medical providers. In order to maximize doulas' roles in advocating for and educating patients, particularly for populations that experience higher maternal mortality rates, Erie recommends the inclusion of rules that allow for doulas to integrate and communicate with the patients' medical home. Additionally, Erie recommends that medical providers be consulted throughout this process to consider their expertise and have everyone that will be engaged in patient care at the table. It is of utmost importance that doulas are aware of clinical risks and the full scope of the patient's medical care, as well as the individual and social risks that the patient reports, in order to have a full picture of the needs and opportunities to achieving improved health outcomes. Erie recommends that doulas be integrated into medical homes to strengthen the outreach and engagement of patients, especially high-risk patients, that may be experiencing additional challenges to become fully participatory of their care. Integration into a medical home allows doulas to maximize access to resources and education available at the medical home. Integration also allows doulas to provide immediate feedback and suggestions to improve access to valued resources and prevents potential duplication and disconnectedness of services already being provided by medical homes.

Reimbursement: Erie recommends adequate reimbursement rates for doula services and asks for further clarification on doula services reimbursement, in particular for federally qualified health centers

Erie recommends that through the rulemaking process, HFS further clarifies how federally qualified health centers, and other encounter clinics, will be reimbursed for doula services. Erie is interested in learning whether doula services will be considered their own billable encounters or whether encounter clinics will need to bill Fee for Service separately for these services. In either case, sufficient rates will be critical to ensuring that FQHCs are able to provide these services for our patients. If we are unable to introduce doula services in a way that is financially viable, this will exacerbate the challenges described above of doula services being disconnected from other aspects of a patient's care.

Erie applauds HFS' efforts to continue improving health outcomes of communities that experience high maternal mortality rates through implementation of programs such as the doula program. Any questions regarding our comments may be directed to Erie's Associate Director of Strategy & Government Relations, Dalia Galvan Morales, at dmorales@eriefamilyhealth.org.

Sincerely,

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