



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
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Dover, Delaware 19901
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The Honorable John Carney,
Governor

John McNeal, Director
SCPD

MEMORANDUM

DATE: October 25, 2023

TO: Planning and Policy Unit, Division of Medicaid and Medical Assistance

FROM: Benjamin Shrader, Chairperson 
State Council for Persons with Disabilities

RE: **PROPOSED DEPARTMENT OF HEALTH AND SOCIAL SERVICES
DIVISION OF MEDICAID AND MEDICAL ASSISTANCE PUBLIC
NOTICE REGARDING STATE PLAN AMENDMENT ADDING DOULA
SERVICES, 27 DEL. REGISTER OF REGULATIONS 235 (OCTOBER 1,
2023).**

The State Council for Persons with Disabilities (SCPD) has reviewed the Delaware Department of Health and Social Services Division of Medicaid and Medical Assistance's proposal for the addition of doula services. This proposed regulation was published as 27 DE Reg. 235 in the October 1, 2023, Register of Regulations.

The SCPD has the following suggestions:

- The amendment leaves the proposed length of prenatal visits up to interpretation. **The SCPD recommends ensuring the benefit includes three visits of up to 90 minutes for both prenatal and postpartum visits.**
- The amendment states that the doula sessions be billed in four units per visit. **The SCPD recommends sessions be billed in 15-minute increments up to the 90-minute limit for each visit in order to be consistent with the parameters set by the legislature.**
- **The SCPD would like further information regarding the planning and implementation of this important service to ensure it gets the attention, expertise and funding it requires to be successful.**

Thank you for your consideration and please contact the SCPD with any questions or comments regarding our observations and recommendations on this proposed regulation.

cc: Ms. Marissa Band, Esquire CLASI, DLP
Governor's Advisory Council for Exceptional Citizens
Developmental Disabilities Council