

# Doula Resources for Standing Up Medicaid Reimbursement



ARIZONA ADVISORY  
COUNCIL ON INDIAN  
HEALTH CARE

# Learning Objectives

1. General information on coding, policy, and FAQ items for Doulas
2. General Documentation Information
3. How to register to become an AHCCCS provider
4. Important Links/Resources

***Please note that this guidance is meant to assist with billing and NOT with the Doula Voluntary Certification process.***





# **Part 1: Doula Billing – Claim Form Coding and Billing Requirements (Basic Overview)**



# AHCCCS is the Final Source of Guidance

Please note that the following slides are indicative of *general AHCCCS guidelines* and not necessarily specific for Doula services.

AHCCCS is always the final source of all billing, policy, and documentation information. Please only use the guidelines within this presentation as a *guide* and additional, supplemental resource. **If AHCCCS publishes something different or updates their guidance, that will supersede this document.**

Additionally, questions on billing and claims should go to the [AHCCCS Provider Training Team within the Division of Fee for Service Management \(DFSM\)](#).

***AHCCCS is the final source of all information.***

# AHCCCS is the Final Source of Guidance

AHCCCS has also published a billing training, which can be found here:

- <https://www.azahcccs.gov/Resources/Downloads/DFSMTraining/2025/DoulaServices.pdf>

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***AHCCCS is the final source of all information.***

# Pathway to Doula Sustainability in Billing

Before any billing to AHCCCS or other health plans can occur, *all providers* (not just the doula provider type) have certain steps to go through.

- These include things such as licensure/voluntary certification and registering with AHCCCS and undergoing their credentialing and fingerprint/background check.
- To bill a Managed Care Organization (MCO), which are called AHCCCS Complete Care Health Plans (ACC Health Plans) in Arizona, a provider must go through the provider registration process with each individual MCO.

***All Providers Must Undergo Registration with Health Plans They Intend to Bill.***

# Pathway to Doula Sustainability in Billing

1. Obtain Doula Voluntary Certification through ADHS
2. NPI Registration (National Provider Identifier)
3. Medicaid (AHCCCS) Enrollment
  - Register as a Provider with AHCCCS
4. CAQH Setup
  - CAQH (Council for Affordable Quality Healthcare) is a non-profit alliance of health plans and trade associations that streamlines administrative healthcare processes, primarily provider credentialing
  - It stores provider credentialing data and shares it with multiple health plans.
5. Managed Care Organization (MCO) Contracting
  - Register with individual MCOs
  - MCOs are called AHCCCS Complete Care (ACC) Health Plans in Arizona
6. Billing for Services



A desert landscape featuring several tall saguaro cacti in the foreground and a range of rugged mountains in the background under a blue sky with scattered white clouds. The text is centered in the middle of the image.

# General Billing Information, Codes, and Prior Authorization

# Codes: What Codes are Reimbursable?

**Ask Yourself:** Can the service provided be billed with one of the 2 reimbursable codes allowed by CMS and AHCCCS?

Reimbursable Codes for CHR Services		
CPT Code	Service Description	Rate
<b>T1032</b>	Services performed by a Doula birth worker, per 15 minutes (up to 2 hours, or 8 units)	\$16.28
<b>T1033</b>	Services performed by a Doula birth worker, per diem (once every 9 months)	\$781.32



## Important Notations

- The T1032 can be billed for each visit.
- The T1033 can only be billed once every 9 months (once per pregnancy) and is typically billed at the end of the pregnancy
- AHCCCS guidance supersedes any guidance in this presentation.

# Visit Limitations and Global OB Bundle

## Visit Limitations:

- There is no minimum or maximum number of visits required, per AMPM 410, Maternity Care Services.

## Global OB Bundle – Are They Included in This?

- **No.** The Doula services are separately reimbursable and are not included in the global OB bundle



# Telehealth

## Telehealth

- Currently doula services are not eligible for reimbursement via telehealth.



# Federal Emergency Services (FES) Program Members

## FESP

- Members enrolled in the Federal Emergency Services program are excluded from reimbursement of services performed by a AHCCCS registered Doula.
- <https://azahcccs.gov/Resources/Downloads/DFSMTraining/2025/DoulaServices.pdf>



# Submitting Claims

Typically claims are submitted electronically.

However, if submitting via paper, then doula services should be billed on the CMS 1500 Claim Form

Please read [Chapter 5, CMS 1500 Claim Form and Claim Submission Requirements, of the DFSM FFS Provider Billing Manual](#) for detailed claim form instructions.

*The following slides cover some fields of interest for doulas.*

# Visit Limitations and Global OB Bundle

## Claim Form Requirements

**\*\*\* Please note this information is from the AHCCCS website and AHCCCS is the final source of all billing information.**

- HCPCS codes T1032 and T1033 are billed on a CMS 1500 Claim Form.
- The NPI is required on all claim submissions.
- The process of submitting claims should begin with the ***very first date that the doula provides a covered service to a member.***
- The initial claim must include the actual date the service was performed, along with all required details (e.g., service codes, NPI number, diagnosis codes, etc.).
- ***No Retroactive Billing:*** You cannot bill for services performed before the doula was registered or before the member received a referral. Billing must reflect the true service timeline.

The above are all important, key bullet points that the AHCCCS provider training team has highlighted in the below training document:

<https://www.azahcccs.gov/Resources/Downloads/DFSMTraining/2025/DoulaServices.pdf>

# Fields of Interest: Field 21

**Field 21 (A-K)** is where you list all the ICD-10 codes (do not use ICD-9 codes) that pertain to the patient in question.

- This should include any social determinant of health codes that are noted by the doula or referring provider.
  - Note: Social Determinants of Health (SDOH) are often called “Z codes”. However, not all social determinant codes start with a Z, and not all “Z codes” are social determinants of health.
- Do not use DSM-4 diagnosis codes.
- Up to twelve diagnosis codes in priority order (primary condition, secondary condition, etc.) may be entered.
- The below example shows Z34.0 (first pregnancy), O24.4 (gestational diabetes), and Z59.5 (extreme poverty – a social determinant of health code).

21. DIAGNOSIS OR NATURE OF ILLNESS OR INJURY Relate A-L to service lines below (24E)				ICD Ind.	10
A. <u>Z34.0</u>	B. <u>O24.4</u>	C. <u>Z59.5</u>	D.		
E.	F.	G.	H.		
I.	J.	K.	L.		

# Fields of Interest: Field 24

## Field 24 (A-J)

24. A. DATE(S) OF SERVICE						B.	C.	D. PROCEDURES, SERVICES, OR SUPPLIES			E.	F.		G.	H.	I.	J.	
From		To				PLACE OF	EMG	(Explain Unusual Circumstances)			DIAGNOSIS	\$ CHARGES		DAYS OF	UNIT	IDENTIFY	RENDERING	
MM	DD	YY	MM	DD	YY	SERVICE		CPT/HCPCS	MODIFIER			POINTER			UNITS	Family Plan	QUAL.	PROVIDER ID. #
05	01	26	05	01	26	12		T1032				AB	65	12	4		NPI	NPI Here
																	NPI	

- A (Dates of Service):** If one day of service is being billed for use the same day as the From and To date.
- B (Place of Service):** Use the appropriate place of service (POS) code. In the below example, POS 12 is used. POS will vary based off where the service was provided.
- C (EMG):** This stands for emergency services. Do not enter anything here, since doula reimbursable services do not meet the definition of an emergency service.
- D (Procedures, Services or Suppliers):** This is where you would put the T1032 or T1033 codes. There are no modifiers available at this time.

# Fields of Interest: Field 24

## Field 24 (A-J)

24. A. DATE(S) OF SERVICE						B.	C.	D. PROCEDURES, SERVICES, OR SUPPLIES		E.	F.		G.	H.	I.	J.	
From		To				PLACE OF	EMG	(Explain Unusual Circumstances)		DIAGNOSIS	\$ CHARGES		DAYS	UNIT	Family	ID.	RENDERING
MM	DD	YY	MM	DD	YY	SERVICE		CPT/HCPCS	MODIFIER	POINTER			OR	Plan	QUAL.	PROVIDER ID. #	
05	01	26	05	01	26	12		T1032		AB	65	12	4		NPI	NPI Here	
															NPI		

**E (Diagnosis Pointer):** Under field E, you would refer to the ICD-10 Diagnosis Codes indicated in Field 21 (see above).

21. DIAGNOSIS OR NATURE OF ILLNESS OR INJURY Relate A-L to service lines below (24E)										ICD Ind.	10												
A.	Z34.0	B.	O24.4	C.	Z59.5	D.		E.		F.		G.		H.		I.		J.		K.		L.	

# Fields of Interest: Field 24

## Field 24 (A-J)

24. A. DATE(S) OF SERVICE						B.	C.	D. PROCEDURES, SERVICES, OR SUPPLIES			E.	F.		G.	H.	I.	J.
From			To			PLACE OF	EMG	(Explain Unusual Circumstances)		DIAGNOSIS	\$ CHARGES		DAYS OR	EPDT	ID.	RENDERING	
MM	DD	YY	MM	DD	YY	SERVICE		CPT/HCPCS	MODIFIER	POINTER			UNITS	Family Plan	QUAL.	PROVIDER ID. #	
05	01	26	05	01	26	12		T1032		AB	65	12	4		NPI	NPI Here	
															NPI		

**F (\$ Charges):** Providers put the monetary amount they are requesting here. You can see that they are requesting \$65.12 in the above example. This is the allowable amount for 4 units of code T1032 (\$16.28 per 15 minute unit). If a provider requests more than that, for example, and puts 200.00 (do not include dollar signs on the actual claim form) under the charges, they would still only receive the \$65.12 as their maximum amount if the claim was approved to pay. Putting a larger amount will not result in larger payment.

**Note:** If more than one unit of service was provided, enter the total charges for all units.

**G (Days or Units):** Put the number of units here, paying attention to the number of hours the service was provided. Here, since CPT code T1032 is measured in 15 minute increments, you would put 4 units to indicate 1 hour of service on this day.

**H (EPSDT/Family Planning):** Leave blank. This is not required.

# Fields of Interest: Field 24

## Field 24 (A-J)

**I (ID Qual):** As a doula you are required to have an NPI.

**J (Rendering Provider ID #):** Enter the NPI here. This is a 10 digit number.

I. ID. QUAL	J. RENDERING PROVIDER ID. #
NPI	1234567890

# Prior Authorization

## Is Prior Authorization Required?

NO! No P.A. is required.

- “The Contractor shall not require prior authorization in order for a pregnant or postpartum member to receive doula services,” per [AMPM Policy 410](#).



No P.A.  
Today!



A desert landscape featuring several tall saguaro cacti in the foreground and a range of rugged mountains in the background under a blue sky with scattered white clouds. The text "Policy and Other Caveats" is centered in the middle of the image.

# Policy and Other Caveats

# Referrals, Certification, and Liability Insurance

A referral for Doula services is needed.

**Referral Required?** *Yes.* The entity billing for Doula services should ensure that a recommendation/referral for services is contained in the member's medical record. Without this on hand, the provider cannot bill for services rendered.

**Referral Format:** AHCCCS does not require the use of a specific referral form, but the referral should indicate that it was made by an eligible physician with the category of service "COS01.

**Liability Insurance?** *No* - Certified Doulas are not required to carry liability insurance when becoming an AHCCCS registered provider.

**License Required?** *Yes.* The Doula performing services must have voluntary certification through the Arizona Department of Health Services (ADHS) in order to bill for Doula services.

# Referrals

Doulas must be recommended/ referred to by an eligible physician or other licensed practitioner of the healing arts acting within their scope of authorized practice under state law. Providers recommending services are limited to those affiliated with the following Provider Types (PTs) with the category of service “COS01”

## AHCCCS-Registered Provider Types

638 FQHC (PT C5)	Community/Rural Health Center (PT 29)	Integrated Clinic (PT IC)	MD-Physician (PT 08)
Behavioral Health (BH) Outpatient Clinic (PT 77)	Federally Qualified Health Center (FQHC) (PT C2)	DO-Physician Osteopath (PT 31)	Physician Assistant (PT 18)
Certified Nurse-Midwife (PT 09)	Free-Standing Birthing Center (PT 83)	Licensed Social Worker (PT 85)	Licensed Marriage and Family Therapist (PT 86)
Licensed Midwife (PT 84)	Licensed Professional Counselor (PT 87)	Psychologist (PT 11)	Community Health Worker Organizations (PT CH)
Clinic (PT 05)	Hospital (PT 02)	Registered Nurse Practitioner (PT 19)	

# Who Can Receive Services and What Can Be Provided?

- All AHCCCS members who are pregnant or postpartum are eligible to receive services from Certified Birthing Doulas. Members do not need to be at a high-risk or experience a complication to be eligible for services.
  - So long as the member is pregnant or within one-year postpartum, medical necessity is met per AMPM 410, Maternity Care Services.
  - Contractors cannot require prior authorization in order for a pregnant or postpartum member to receive doula services.
- Per the [State Plan Amendment](#), Doulas may provide:
  - AHCCCS-covered patient education and preventive services to pregnant women and their families before, during, and after childbirth;
  - Care coordination;
  - Social support, coaching, and emotional support.

**STATE PLAN INDEX**

# Policy Recap

Per AHCCCS Medical Policy Manual (AMPM) 410, Maternity Care Services, located at <https://www.azahcccs.gov/shared/Downloads/MedicalPolicyManual/400/410.pdf>:

The Doula services are covered for AHCCCS members during pregnancy, labor and delivery, and up to one year postpartum under the following conditions:

- 1) Doula is certified through the Arizona Department of Health Services,
- 2) Doula is an AHCCCS-registered provider,
- 3) The services provided are within the scope of practice for Doulas pursuant to AAC R9-16-901 through 909,
- 4) The Doula services are provided in complement to, and do not replace, prenatal, labor and delivery, and postpartum care provided by a physician, Certified Nurse Midwife, Licensed Midwife, or other licensed provider for which maternity care is within their scope of practice, and
- 5) The member is referred for Doula services by a provider.

A desert landscape featuring several tall saguaro cacti in the foreground and a range of rugged mountains in the background under a blue sky with scattered white clouds. The text "Timely Filing for Medicaid" is centered in the upper half of the image.

# Timely Filing for Medicaid

# What is Timely Filing?

## *Time Matters!!!*

Per State law (ARS §36-2904 (G),) an initial claim for services provided to an AHCCCS member ***must be received by AHCCCS no later than 6 months after the date of service***, unless the claim involves retro-eligibility.

For claims filed by FFS providers:

AHCCCS **must receive the initial claim** no later than **6 months** after the initial date of service.

A **clean claim** (a healthcare claim submitted by a provider, that processes through AHCCCS and **pays without any errors**) must be processed by AHCCCS no later than **12 months** from the initial date of service.

### Why are there two time frames?

As long as the **initial claim** is received within that initial 6-month window, ***corrections can still be submitted up to 12 months after the date of service***, even if the claim is denied due to an error.

Do not void the initial claim if you are past that 6-month window. Voiding and resubmitting a claim “restarts the clock”.

# Timely Filing Scenarios

## Scenario 1 for Fee for Service Providers

**4/1/2026** – A doula provides a service to a member on **4/1/2026**

**10/1/2026** – Your program (stage 2) or the provider billing *for* your program (stage 1), does not submit the claim to AHCCCS until 10/1/2026

**Result:** The claim will ***automatically deny for failure to comply with timely filing deadlines.***

**Payment Received:** None. Your program will receive no payment.

AHCCCS will not be able to make an exception for this, since this timeframe is the result of ***state law.***

# Timely Filing Scenarios

## Scenario 2 for Fee for Service Providers

**4/1/2026** – A doula provides a service to a member on **4/1/2026**

**6/1/2026** – Your program (stage 2) or the provider billing *for* your program (stage 1), does not submit the claim to AHCCCS until 6/1/2026

**Result:** The claim will **PROCESS**. It has met timely filing deadlines and was submitted before the 6 month window ended. (6 month window would end on 9/30/2026)

## What Happens Next?

Once the initial claim is submitted within the timely filing deadline, the AHCCCS claims system will process the claim.

If there are no errors, the claim will pay.

If AHCCCS finds errors on the claim *or* if additional information is needed to substantiate the service provided, you will then have the opportunity to submit corrections or the additional documentation requested.

A scenic desert landscape featuring several tall saguaro cacti in the foreground and a range of rugged mountains in the background. The sky is a clear, bright blue with scattered white clouds. The overall atmosphere is bright and sunny.

Pop Quiz Time!

# Group Participation!

## Timely Filing Scenarios

### Scenario 3:

Date of Service: 4/1/2026

Claim submission date: 9/30/2026

**Does this claim deny for timely filing, or process?**

# Group Participation!

## Timely Filing Scenarios

### Scenario 3 Continued!

It met timely filing deadlines (by 1 day!) so the claim processes!

**However...**when AHCCCS reviewed the claim there were errors on it. So the claim actually denies on 10/7/2026.

AHCCCS sends a notice to the provider on 10/7/2026. The notice identifies an error in the service location and also requests additional documentation.

***What does the provider need to do?***

***What day do they need to do it by?***

# Group Participation!

## Timely Filing Scenarios

### Scenario 3 Continued!

#### What does the provider need to do?

The provider needs to submit a correction to the claim (DO NOT VOID THE INITIAL CLAIM). They will also need to provide additional documentation as requested.

#### What day do they need to do it by?

Remember the initial Date of Service (DOS) was 4/1/2026. So the 12 month window for the “clean claim” processing will close on 3/31/2027.

The provider needs to accomplish this all by 3/31/2027.

**The claim now processes with the corrections and documentation submitted, and pays! Congratulations!**

# Question and Answer Time!





## **Part 2: Doula Billing – Documentation Basics and Provider Registration**

A photograph of a desert landscape featuring several tall saguaro cacti in the foreground and middle ground. In the background, there are rugged, rocky mountains under a blue sky with scattered white clouds. The text "Documentation and Record Requirements" is overlaid in the center in a teal color.

# Documentation and Record Requirements

# That Dreaded “A” Word

Audits don't happen frequently, but can happen due to random selection.

- If a claim for services you provided is ever pulled for an audit, you can ensure an easy passage of it by having documentation that is *complete and accurate* on hand.
- Providers rendering services to Medicaid members should keep records on hand for at least **six (6) years**. However, please note that CMS requires Medicare manager care providers to retain documentation for **ten (10) years**. Many providers follow this as a standard practice.





# The Importance of Maintaining Records

Douglas should maintain all records of visits and proper documentation.

**If AHCCCS requests documentation that a provider is unable to provide, the claim may be subject to recoupment.**

- Recoupment simply means that the provider will have to pay the State of Arizona's Medicaid program *back* for any funds initially received for their submitted claim.

***This is standard practice for all Medicaid programs nation-wide***

## **Why?**

Providers requesting *any form* of Medicaid reimbursement (including from MCOs) must maintain documentation to substantiate that the service provided was:

- A Medicaid-eligible service, *and*
- Provided by an eligible AHCCCS provider.

***This is both a federal and state requirement.***

# What Documentation Should a Doula Keep?

As a provider it is vital that you maintain documentation to prove compliance with AHCCCS and State polices regarding Doula services.

**Please keep on file the following items, as AHCCCS may request a copy at any time.**

1. Proof of Doula Voluntary Certification
2. Referral from the Referring Provider
3. Information that Substantiates Medical Need
4. Visit Notes



# What Documentation Should Doulas Keep?

- 1. Proof of Doula Voluntary Certification** going back at least 6 years, for all employed Doulas is a recommendation to comply with Medicaid requirements.
  - Doulas renew their certification every 3 years through ADHS. You should not dispose of past proof of Doula certification, simply because they had their certification renewed and entered a new certification cycle.
    - **Initial Certification Cost:** \$300
    - **Renewal:** *TBD – So far only 3 Doulas have registered in the entire State of Arizona (as of March 2025) so no renewal fees have been decided upon at this time. Renewals will happen every 3 years (anticipated) per ADHS on 3/7/2025.*
  - **Why?** This will allow AHCCCS to ensure that the Doula providing the service was certified when the visit took place. If a past claim that the Doula submitted is audited, they will need to have that past Doula certification on hand to provide during the review/audit process. The health plan will need proof that the Doula was certified *when the service was rendered*. You can streamline this process for yourself, as a Doula, organization out by keeping comprehensive and tidy records.

# What Documentation Should Doulas Keep?

## 2. Referral from the Referring Provider

- **Why?** One of the requirements for Doula services is that there is a recommendation/referral from an eligible physician or other licensed practitioner of the healing arts, that is acting within their scope of authorized practice under state law.
- It is important to retain a copy of the referral as proof that the service rendered was medically necessary and endorsed by a healthcare provider.

AHCCCS-Registered Provider Types			
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# What Documentation Should Doulas Keep?

## 2. Referral from the Referring Provider – ROPA Requirements

- ROPA Requirements refer to Referring, Ordering, Prescribing and Attending (ROPA) Providers.
- Per the Patient Protection and Affordable Care Act (ACA) **all providers** who refer any service or item for an AHCCCS member, **who order a non-physician service for a member**, who prescribe a medication for a member, or who attend/certify medical necessity for services or who take primary responsibility for a member's medical care **must be registered as an AHCCCS provider.**
- In order for a referral to be valid for doula services, the provider must be one of the provider types listed on the previous slide, and they must also be registered with AHCCCS.
- AHCCCS publishes lists of active, registered providers by their NPI who are considered ROPA providers. Slide 12 of the provider training team's presentation has direct links to these lists: [DoulaServices.pdf](#)

# What Documentation Should Doulas Keep?

## 3. Information on Documented Medical Necessity

- What is Needed?
  1. Documentation showing that the member is pregnant or was within one-year postpartum. The member does NOT need to have had a complication or high-risk pregnancy.
- Per the [AHCCCS Medical Policy Manual \(AMPM\) 410, Maternity Care Services](#), this is a requirement. AMPM 410 can be found here:
  - <https://www.azahcccs.gov/shared/Downloads/MedicalPolicyManual/400/410.pdf>
- It is important for Doulas to not only secure all protected health information (PHI), but to also maintain documentation that the member met the qualifying condition. This allows AHCCCS to reimburse for the service.

# What Documentation Should Doulas Keep?

## 4. Visit Notes

- **Why?** Doulas often have multiple certifications and provide a lot of services, but not all are Medicaid-eligible for reimbursement. Detailed visit notes will provide proof that it met the requirements outlined in AMPM 410.
- Per the [AHCCCS Provider Training Team documentation](#) must include the following:
  - Date of service
  - Description of services provided
  - Assessment of any member needs beyond routine care
  - Any referrals made
  - Any birthing plans/goals developed with the member and member's approval

***The member's medical record and visit note must substantiate and document what was done during the visit.***

***It is imperative to ensure the member's record has the recommendation/referral for services from the licensed provider.***

# Referrals



# Good Documentation Starts with a Good Referral

## Referrals are Required for Service

- Documentation is important, and this includes having **accurate and adequate information on the referral.**
- Referrals are **required** for CHR services to be reimbursed.

If a referral lacks information, if the services are audited down the line, a CHR organization may struggle with providing the information necessary to fulfill audit requirements.

Many providers have their own referral forms, but if what you receive from the referring provider doesn't seem like enough information, give them a call and you can obtain the rest of the needed fields.

# Referrals

Doulas must be recommended/ referred to by an eligible physician or other licensed practitioner of the healing arts acting within their scope of authorized practice under state law. Providers recommending services are limited to those affiliated with the following Provider Types (PTs) with the category of service “COS01”

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Clinic (PT 05)	Hospital (PT 02)	Registered Nurse Practitioner (PT 19)	

# Example Referral Form Sections

## Example Doula Referral Form

Remember that if you intend to submit for services, you want documentation to substantiate that the service provided was what the provider initially requested.

You can design your own referral forms and fill them out based on forms you receive from referring providers.

Health plans will also have example referral forms.

Some examples are included in the following slides.

Licensed Provider's Recommendation for Doula Services		
Beneficiary First Name:	Middle Name:	Last Name:
Beneficiary's Date of Birth:	Licensed Provider's NPI Number:	
Licensed Provider First Name:	Middle Name:	Last Name:
Date of Recommendation:	Licensed Provider's Signature:	

Example from  
Medi Cal: [Medi-Cal  
Doula Services  
Recommendation](#)

# Example Referral Form Sections

## Example Doula Referral Form

- [Doula Services Referral Form](#)  
[Molina Healthcare of California](#)

### Member Information

Member Name: \*

Date of Birth: \* Member ID #: \*

Primary Phone #: \* Best time to contact: \*

Preferred Language: \*

Email: \*

Address: \*

### Pregnancy Information

Due date\* First pregnancy:  Yes  No

Expected Birth Location  
(ie: hospital, home, birth center)

### Service Preferences

Doula Preferences (if any)

Cultural/Religious Considerations

Other Preferences or Requests

### Provider Information

Referred by: Referral Date

Referring Provider/Agency

Provider/Agency Contact Information

Phone number: Email Address

# Example Referral Form Sections

## Example Doula Referral Form

- [BDS-Referral-Form.pdf](#)

### Birth Doula Services Referral Form

#### Client Information:

Name: \_\_\_\_\_ Date of Referral: \_\_\_\_\_

Expected Due Date: \_\_\_\_\_ Client's DOB: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Client Phone: \_\_\_\_\_ 2<sup>nd</sup> Phone: \_\_\_\_\_  Ok to LM?

Email: \_\_\_\_\_

Primary Language: \_\_\_\_\_ Will an interpreter be needed at intake?:  Yes  No

#### Referral Source Information:

Referred By: \_\_\_\_\_ Phone #: \_\_\_\_\_

Do you want to be notified of referral outcome?:  Yes  No

Verbal Consent of client to Notify Referral:  Yes  No Date: \_\_\_\_\_

#### Outreach Doula Program:

Does your client identify as part of any of these communities:

African American  Somali  Native American/Alaskan Native  Latinx/Spanish speaking

Does your client currently receive TANF, specifically TANF WorkFirst?  Yes  No

Would your client be interested in our Outreach Doula Program: Open Arms' Outreach Doula program connects women to outreach doulas – women who are from their community and who are specially trained to provide support during the sensitive first months of pregnancy through a child's second birthday.  Yes  No

Additional Notes: \_\_\_\_\_

Does your client receive any of the following benefits (check all that apply):

TANF (WorkFirst)  WIC  DSHS  PHN/NFP  Medicaid/Apple Health

A scenic desert landscape featuring several tall saguaro cacti in the foreground and a range of rugged mountains in the background under a bright blue sky with scattered white clouds. The text "Certification Information" is centered in the middle of the image.

# Certification Information

# Certification Information: Documents Required

## How Can I Become a Doula Who Bills?

To become registered as a doula and to begin billing Medicaid, a doula must:

1. Register with ADHS, *and*
2. Register with AHCCCS.

Important links to hold onto include:

The Doula Licensing Information ADHS webpage:

- <https://www.azdhs.gov/licensing/blpo/doulas/index.php#licensing-information-and-application-checklist-and-forms>

The Doula Certification Initial Application Checklist:

- <https://www.azdhs.gov/documents/licensing/special/doulas/doula-initial-application-checklist.pdf?v=20250801>

# Certification Information: Where Can I Find Information?

Licensing, prior to billing, must be obtained through the Arizona Department of Health Services (ADHS).

- Per AHCCCS, Doula certification through a national, international, or other organization does not meet the requirement for AHCCCS enrollment and reimbursement.



Information about the licensing process can be found on the ADHS website below:

- <https://www.azdhs.gov/licensing/blpo/doulas/index.php>

# Certification Information: Time Frame & Address

As of February 2026, the ADHS website has turnaround time frames estimated to be around 3-4 weeks for processing. ***Expedited licensing services are not available.***

A completed application and its accompanying licensing fees (via cashier's check or money order made payable to Arizona Department of Health Services) should be mailed to:

Bureau of Licensing for Professions & Occupations  
Department of Health Services  
150 N. 18th Avenue, Suite 410  
Phoenix, AZ 85007



# Certification Information: Cost

## Certified Doula Fee Table

Pursuant to Arizona Revised Statute (A.R.S.) § 36-766.06, "The director, by rule, shall establish and collect nonrefundable fees for state-certified doula certification that are consistent with fees prescribed pursuant to section 36-1908. The department shall deposit the fees in a segregated account in the health services licensing fund established by section 36-414. See Arizona Administrative Code (A.A.C.) R9-16-909(A-D).

### Application Type:

<b>Fees:</b>	Initial	Reciprocity	Renewal	Duplicate/Revised Certificates
Application Fee	\$100	\$100	n/a	n/a
Certification Fee	\$200	\$200	n/a	\$25
Renewal Fee	n/a	n/a	\$200	n/a
<b>Total</b>	<b>\$300</b>	<b>\$300</b>	<b>\$200</b>	<b>\$25</b>

\*Application fees cannot be transferred and are nonrefundable. Where applicable, individual application fee waivers are available for qualifying first-time (initial) applicants which reduces fees to \$0.

# Certification Information: Cost

There are certain cases where licensing fees will be waived, per [A.R.S. § 41-1080.01](#). If someone is applying for a specific license (Doula licensure included) for the **first time in Arizona** they may request an initial license fee waiver if:

- The family income does not exceed 200% of the federal poverty guidelines; *or*
- They are an active duty military service member's spouse; *or*
- They are an honorably discharged veteran who has been discharged not more than two years before the date of the application.

To apply for the waiver, an applicant must sign the attestation on the fee page of the application. [View the current federal poverty guidelines.](#)



# Certification Information: Federal Poverty Level (FPL) Estimates

## What Income is 200% or Below for 2026?

Please note these are guidelines and federal websites should also be checked.

Region	Family Size	Income Limits/Range
Individual	in Lower 48 States and District of Columbia	\$31,920
Family of 4	in Lower 48 States and District of Columbia	\$66,000
Individual	Alaska	\$39,900
Individual	Hawaii	\$36,720
Family of 4	Alaska	\$82,500
Family of 4	Hawaii	\$75,900

Source: <https://www.healthcare.gov/glossary/federal-poverty-level-fpl/> and Marketplace Representative

# Certification Information: Reciprocity

## Can an Out-of-State License Transfer to Arizona? **Yes.**

Arizona recognizes universal licensing and reciprocity with other states.

- For recognition, Doula applicants **must have been licensed in their prior state for a minimum of one year.**
- If their license does not list the active date, and only the expiration date, the Doula applicant must also provide documentation of the date that their license became effective, *or* a copy of their license from the prior licensing timeframe.
- Applicants must also provide an [Attestation of Licensure in Another State](#) (this is required for each state in which the applicant holds a license).

For more information on recognition of out-of-state licenses, see [A.R.S. § 32-4302](#).

Per ADHS, applicants with an active Doula certification may wish to apply for initial licensing instead of reciprocity, as less documentation is required.



# Certification Information: Documents Required

## What Documents are Required?

- A completed and signed High School/High School Equivalency Attestation.
- A signed Doula Code of Ethics Agreement
- Documentation of training in First Aid and Cardiopulmonary Resuscitation through a course recognized by the American Heart Association
- A valid fingerprint clearance card issued according to A.R.S. § 36-766.01(A)(3)
- A nonrefundable application fee of \$100 plus an initial license fee of \$200
- A completed and signed Statement of Citizenship or Alien Status form.
- A photocopy of citizenship or authorized presence document demonstrating applicant is 18 years of age, or older
- Licensure pathway documentation (covered in latter slides)

**Note:** *If current legal name is different than the name on any of the documents submitted, provide a photocopy of a name linkage document (marriage certificate, divorce decree, court order, etc.).*

# Certification Information: Documents Required

## What Documents are Required if License was Previously Suspended?

- If the applicant has previously had a professional license or certificate suspended, revoked, or disciplinary action taken against them within the previous five years, documentation should be included with the application that includes:
  - The date of the disciplinary action, revocation, or suspension;
  - The state or nationally accredited certifying body that issued the disciplinary action, revocation, or suspension; and
  - An explanation of the disciplinary action, revocation, or suspension.
- If currently ineligible for licensing or certification in any state because of a license revocation or suspension, provide a photocopy of documentation that includes:
  - The date of the ineligibility;
  - The state or jurisdiction of the ineligibility; and
  - An explanation of the ineligibility for licensing or certification.

# Certification Information: Licensure Pathway Documentation

## Different Pathways to Becoming Certified

There are currently 5 pathways to certification.

- For many long-practicing doulas, pathway 3 will be the pathway to achieving doula certification.
- This pathway allows doulas to sign an attestation demonstrating community training in non-western doula practices.



# Certification Information: Licensure Pathway Documentation

## Pathway 1



- A completed and signed [Birth Observation form](#).
  - <https://www.azdhs.gov/documents/licensing/special/doulas/birth-observation-form.pdf?v=20250711>
- A completed and signed [Primary Doula Attestation](#) for three (3) births while serving as the primary doula, including evaluations from the laboring mother and medical provider/licensed midwife.
  - <https://www.azdhs.gov/documents/licensing/special/doulas/primary-doula-attestation-3-birth.pdf?v=20250711>
- Completed and signed [Doula Competency Attestation](#) form demonstrating at least 30 hours of in-person instruction or a combination of in-person and online instruction in core competency topics.
  - <https://www.azdhs.gov/documents/licensing/special/doulas/doula-competency-attestation.pdf?v=20250711>

# Certification Information: Licensure Pathway Documentation

## Pathway 2

- A completed and signed [Birth Observation form](#).
  - <https://www.azdhs.gov/documents/licensing/special/doulas/birth-observation-form.pdf?v=20250711>
- A completed and signed [Primary Doula Attestation](#) for three (3) births while serving as the primary doula, including evaluations from the laboring mother and medical provider/licensed midwife.
  - <https://www.azdhs.gov/documents/licensing/special/doulas/primary-doula-attestation-3-birth.pdf?v=20250711>
- Proof of current certification from a nationally recognized doula organization.



# Certification Information: Licensure Pathway Documentation

## Pathway 3



- A completed and signed [Birth Observation form](#).
  - <https://www.azdhs.gov/documents/licensing/special/doulas/birth-observation-form.pdf?v=20250711>
- A completed and signed [Primary Doula Attestation](#) for three (3) births while serving as the primary doula, including evaluations from the laboring mother and medical provider/licensed midwife.
  - <https://www.azdhs.gov/documents/licensing/special/doulas/primary-doula-attestation-3-birth.pdf?v=20250711>
- Completed and signed [Doula Competency Attestation](#) form demonstrating community training in non-western doula practices and confirmation of completed core competency training through culturally specific training or education.
  - <https://www.azdhs.gov/documents/licensing/special/doulas/doula-competency-attestation.pdf?v=20250711>

# Certification Information: Licensure Pathway Documentation

## Pathway 4



- A completed and signed [Birth Observation form](#).
  - <https://www.azdhs.gov/documents/licensing/special/doulas/birth-observation-form.pdf?v=20250711>
- A completed and signed [Primary Doula Attestation](#) for three (3) births while serving as the primary doula, including evaluations from the laboring mother and medical provider/licensed midwife.
  - <https://www.azdhs.gov/documents/licensing/special/doulas/primary-doula-attestation-3-birth.pdf?v=20250711>
- Completed and signed [Doula Competency Attestation](#) form demonstrating other related individualized or experiential training or education and confirmation of completed core competency training through culturally specific training or education.
  - <https://www.azdhs.gov/documents/licensing/special/doulas/doula-competency-attestation.pdf?v=20250711>

# Certification Information: Licensure Pathway Documentation

## Pathway 5

If you are an individual who does not otherwise qualify, but has been practicing as a doula in this state for at least five (5) years before September 29, 2021, you may apply by submitting ALL OF THE FOLLOWING:

- Proof of current certification from a nationally recognized doula organization; *and*
- Completed and signed Letters of Recommendation form from health care professionals who have worked with the applicant within the preceding two years who can attest to the applicant's competency in providing doula services.



A desert landscape featuring several tall saguaro cacti in the foreground and a range of rugged mountains in the background under a clear blue sky with scattered white clouds. The text is centered over the middle of the image.

# How to Register to Become an AHCCCS-Registered Provider

# Starting Out

As previously mentioned, the **very first step of sustainability is achieving licensure through the Arizona Department of Health Services.**

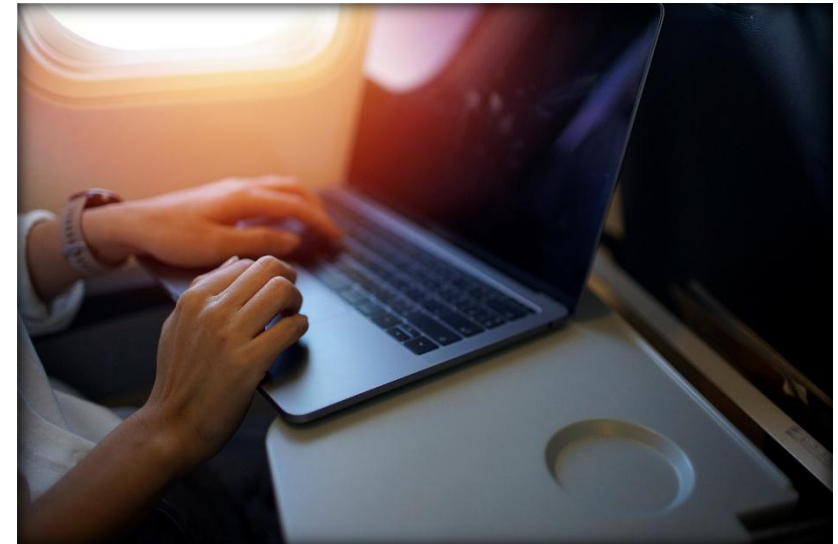
- 1) ADHS Doula Voluntary Certification
- 2) Register with AHCCCS
  - Individual Doulas do register with AHCCCS, but cannot be reimbursed for services or registered with AHCCCS unless they have sought out voluntary certification through the Arizona Department of Health Services (ADHS). Once that has been completed, providers may register with AHCCCS.
- 3) CAQH Setup
- 4) Credentialing with AHCCCS-contracted health plans takes place after AHCCCS registration is completed. These are also known as AHCCCS Complete Care (ACC) Health Plans or Managed Care Organizations (MCOs).
  - Please reach out to the individual health plan provider network department.
  - Health plan information can be found on the AHCCCS website at:  
[www.azahcccs.gov/healthplans](http://www.azahcccs.gov/healthplans)

**IMPORTANT:** AHCCCS registered and ADHS certified doulas are **not** required to credential and contract with AHCCCS-contracted health plans to provide services to Fee-for-Service (FFS) members enrolled in the American Indian Health Plan (AIHP).

# Starting Out

Some helpful links are below to assist providers in researching this.

- **Provider Registration for Individual Providers “How To” Guide:**  
[https://www.azahcccs.gov/PlansProviders/Downloads/APEP/Tutorials/Individual\\_Enrollment.pdf](https://www.azahcccs.gov/PlansProviders/Downloads/APEP/Tutorials/Individual_Enrollment.pdf)
- **APEP Steps:** <https://www.azahcccs.gov/APEP>
- **AHCCCS Provider Enrollment Portal:**  
<https://www.azahcccs.gov/PlansProviders/APEP/ProviderEnrollment.html>
- **ADHS Doula Home Page:**  
<https://www.azdhs.gov/licensing/blpo/doulas/index.php>
- **ADHS Doula – Voluntary Certification – Check List:**  
<https://www.azdhs.gov/documents/licensing/special/doulas/doula-initial-application-checklist.pdf?v=20241203>



# How to Register to Become an AHCCCS Provider

Provider Name	Provider Type	Enrollment Type	National Provider Identifier (NPI) Required? (Yes/No)
Doula	DU	Individual	Yes

Enrollment Fee Required? (Yes/No)	Site Visit Required? (Yes/No)	Risk Category	Fingerprint based Criminal Background Check Required? (Yes/No)
No	No	Limited	No

Electronic Funds Transfer (EFT) Required? (Yes/No)	Regulatory Agency and Certifications
Yes (Sole Proprietors Only)**	Arizona Department of Health Services

Provider registration policy manual and information on the doula provider type can be found here:

- [https://pepm.azahcccs.gov/PEPM/index.html#t=Policy%2FChapter\\_100\\_General\\_Provider\\_Enrollment\\_Eligibility%2F111\\_Provider\\_Types%2FDU\\_Doula.htm](https://pepm.azahcccs.gov/PEPM/index.html#t=Policy%2FChapter_100_General_Provider_Enrollment_Eligibility%2F111_Provider_Types%2FDU_Doula.htm)

# Limited Risk Provider Enrollment Requirements

Each applying provider must be screened based on their assigned risk level. The general screening requirements for the Limited Risk Profile, which Doulas are classified as, are below:

- Verify that a provider meets any applicable Federal regulations or State requirements for the provider type prior to making an enrollment determination,
- License verifications, *and*
- Conduct Database Checks.



# Steps to Register as an AHCCCS Provider

## Step 1: Prepare Documentation in Advance

1. **W9 Tax Form** - Request for Taxpayer Identification Number and Certification – Any provider who will be receiving state/federal funds for services rendered or provided to Medicaid recipients must provide completed W9 tax form as part of the application process.
  - a) The W9 form must have been signed within 12 months of the application.
  - b) Contact Information:
    - The W9 form can be found on the [IRS website](#).
2. **Current Professional Certifications or Licensures** – Providers must maintain current and ongoing certification or licensure when enrolling and participating in the Medicaid Program with an active status of the provider enrollment AHCCCS ID.
  - Doulas should ensure they have their voluntary certification information on hand. This will need submitted to AHCCCS.

# Steps to Register as an AHCCCS Provider

## Step 1: Prepare Documentation in Advance

4. **Tribal Business License** – Any provider intending to operate within boundaries of Tribal lands must have an active, valid Tribal Business License.
5. **Signed and Dated Doula Profile Form**
  - a) The form to sign is located here: [Waiting on this](#)
  - b) On Page 2, fill out the fields at the bottom of the form.
  - c) **Signature, Printed Name, and Date Fields:** The authorized representative from your organization (usually the owner) will sign and date here.
  - d) **Provider Name Field:** The name of your organization
  - e) **Provider ID Field:** This field can be left blank at this time. That is the *future AHCCCS ID Number*, that is not yet assigned.
  - f) Upload document into APEP

Signature		Printed Name	
Date			
Provider Name		Provider ID Number	

# Steps to Register as an AHCCCS Provider

## Step 1: Prepare Documentation in Advance

### 6. Provider Basic Information

a) This includes the following information:

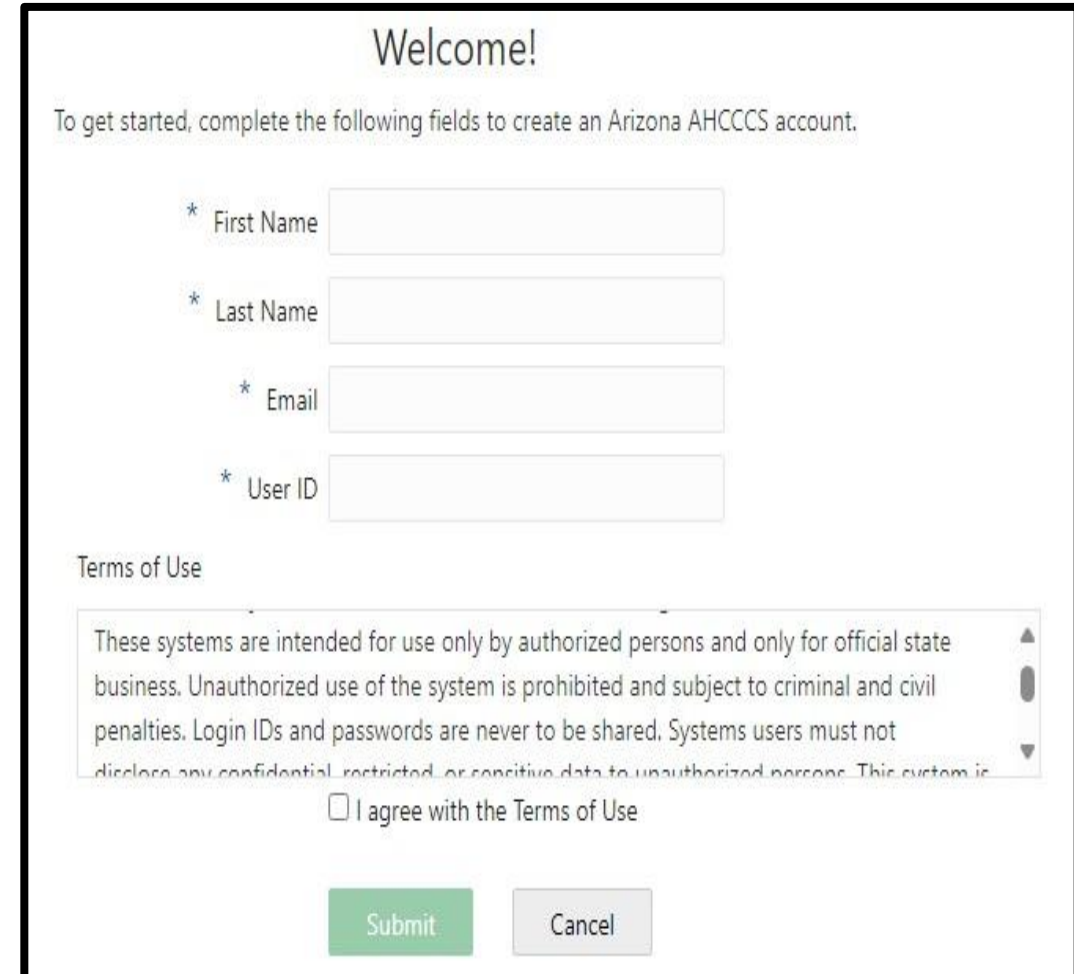
- Entity Name (Doula Name)
- Practice Location (Address)
- Tax ID (See #2 above)
- Billing Associations (if you have contracted with a third party to do your organization's billing on your behalf)
- Ownership disclosures - This includes disclosure of ownership and control interests as well as disclosing any adverse actions the disclosed individuals may have (such as felonies, state exclusions, terminations and other actions). The ownership disclosures must match publicly available records such as the Arizona Corporation Commission. This includes U.S. and international ownerships.



# Steps to Register as an AHCCCS Provider

## Step 2: Register with the AHCCCS Provider Enrollment Portal (APEP)

1. To register with APEP, go to this link:  
<https://evobrix.az-apep.gov/UserRegistration>
2. Once registered, and once you have all your needed documents gathered up, you can begin the registration process.
3. If you require technical assistance or have questions, you can contact AHCCCS Provider Enrollment at:
  - 1-800-794-6862 (In State - Outside of Maricopa County)
  - 1-800-523-0231 (Out of State)
  - [APEPTrainingQuestions@azahcccs.gov](mailto:APEPTrainingQuestions@azahcccs.gov)



The screenshot shows a registration form titled "Welcome!". Below the title, it says "To get started, complete the following fields to create an Arizona AHCCCS account." There are four required fields, each marked with an asterisk: "First Name", "Last Name", "Email", and "User ID". Below these fields is a "Terms of Use" section with a scrollable text area containing the following text: "These systems are intended for use only by authorized persons and only for official state business. Unauthorized use of the system is prohibited and subject to criminal and civil penalties. Login IDs and passwords are never to be shared. Systems users must not disclose any confidential, restricted, or sensitive data to unauthorized persons. This system is...". Below the text is a checkbox labeled "I agree with the Terms of Use". At the bottom of the form are two buttons: "Submit" (green) and "Cancel" (grey).

# Steps to Register as an AHCCCS Provider

## Step 3: Make Sure You Have Read Required Documentation

1. There is going to be a lot of reading, including the Provider Participation Agreement, which can be found here:

<https://www.azahcccs.gov/PlansProviders/Downloads/ProviderRegistration/PEP-202.8.pdf>

- By enrolling with AHCCCS, you are agreeing to these terms and conditions. This includes the responsibility to stay updated on any and all changes to the AHCCCS website, billing and policy manuals, etc.



# Provider Welcome Letter



# AHCCCS Provider Welcome Letter

Once registered with AHCCCS, a provider welcome letter will be sent to providers.

- The welcome letter provides important information in a concise and direct manner so providers are aware of their responsibilities, and know what resources they are responsible for reviewing.

We will offer a brief synopsis of the welcome letter components.



# AHCCCS Provider Welcome Letter

## Providing Services to Fee-for-Service (FFS) Members

- The welcome letter states, very clearly, that as a new AHCCCS provider that the provider may ***immediately begin*** to provide services to Fee-for-Service (FFS) members, who are not enrolled with an MCO (referred to as a contractor).
- It also states that no separate contract is needed to do this.
- It lists out what enrollment types may look like, including members enrolled in the American Indian Health Program (AIHP), Tribal ALTCS (Arizona Long Term Care System), or a Tribal Regional Behavioral Health Authority (TRBHA).

## Providing Services to MCO Members

- The welcome letter states that in order to provide services to a member enrolled with a contractor (also referred to as an AHCCCS Complete Care (ACC) integrated health plan or Managed Care Organization (MCO), that the provider will need to contract separately with the health plan.
- A link is provided so providers have contact information for each MCO. It is here: [www.azahcccs.gov/choice](http://www.azahcccs.gov/choice)

# AHCCCS Provider Welcome Letter

## Responsibility to Report Changes

- The welcome letter reinforces that it is a provider's responsibility to report changes that impact their provider ID to the Division of Member and Provider Services (DMPS) at AHCCCS, within the time limits prescribed in the Provider Participation Agreement (PPA)>
- Changes that impact a Provider ID and require reporting include, but are not limited to:
  - Changes in ownership
  - Changes in Correspondence (email, physical address, etc.)
  - Pay-to and Service location changes
  - Licensure actions



# AHCCCS Provider Welcome Letter

## Responsibility to Stay Apprised of Information

The welcome letter reinforces also lists out the guides, manuals, and other areas of the AHCCCS website that a provider is responsible for staying up-to-date on. This includes:

- Policy and billing manuals
- Newsletters and bulletins
- Fee schedules
- Medicaid email notification options
- Training resources on a variety of topics including how to verify member eligibility, how to submit prior authorization requests and claims to the Division of Fee-For-Service Management (DFSM)

A great way to stay up-to-date is to subscribe to the Constant Contacts email distribution lists!

- [Subscribe Here!](#)



# AHCCCS Provider Welcome Letter

## Responsibility to Stay Apprised of Policies and Manuals

This includes staying up-to-date on the following billing and policy manuals:

**1. AHCCCS Medicaid Policy Manual (AMPM)**

- Contains detailed information about covered services and benefits.

**2. AHCCCS Contractor's Operation Manual (ACOM)**

- Contains information on administrative, claims, financial and operational policies for contractors and subcontractors.

**3. The Fee-For-Service Provider Billing and (if applicable) the IHS/Tribal Provider Billing Manual**

- Information on member eligibility categories, provider registration, claims and billing, prior authorization, service coverages and limitations, third party liability, claims processing, disputes, understanding the remittance advice, and the ALTCS program.

# AHCCCS Provider Welcome Letter

## Billing for Services and AHCCCS Online Provider Portal

The welcome letter provides information about electronic claims submission and what can be done on the AHCCCS Online Provider Portal, which includes the following:

- Claim Status
- Claim Submission
- Member Verification
- Newborn Verification
- Provider Verification
- Prior Authorization Inquiry
- Prior Authorization Submission
- Member Supplemental Data



The screenshot shows the top navigation bar with links for [FAQ](#), [Terms Of Use](#), and [LogIn](#). Below the navigation bar is a large banner featuring the Arizona state flag. The banner text reads: **Arizona Health Care Cost Containment System** and *Our first care is your health care*. At the bottom of the banner is a blue button labeled **New Account**. Below the button are two white buttons: [Register for an AHCCCS Online account](#) and [Learn more about AHCCCS Online](#).

# AHCCCS Provider Welcome Letter

## Affordable Care Act of 2010 Information

Pursuant to Section 6505 of the Affordable Care Act of 2010 [42 U.S.C. §1396a(a)(80)], AHCCCS is required to **not** make any payment for any item or service if it involved an entity located outside the United States.

- Section 1101(a)(1) of the Act defines the term State to include the District of Columbia, Puerto Rico, the Virgin Islands, Guam, the Northern Mariana Islands, and American Samoa when used under Title XIX.



A desert landscape featuring several tall saguaro cacti in the foreground and a range of rugged mountains in the background under a blue sky with scattered white clouds. The text "Other Noteworthy Items" is centered in the upper half of the image.

# Other Noteworthy Items

# Important Takeaways

- Certification MATTERS!
- *Billing can only occur for services provided to Medicaid members by Doulas who are voluntary certified through the State.*
- Doulas *who are not voluntarily certified* can still provide Doula services, but they *cannot bill for services provided by them* to AHCCCS members.





## **Part 3: Visit Note Writing Session**



# Visit Notes Writing Session

## How to Write a Good Visit Note?

1. Consider the referral form
2. Consider mom's wishes and partner/dad's wishes
3. Consider the intake form from mom/partner/dad
  - <https://bergendoula.com/wp-content/uploads/2017/05/New-Client-Intake-Form-.pdf>
  - <https://www.morganerichardsondoula.com/intakeform>
  - <https://motherbabysupport.net/doula-client-visit-forms/>
4. Consider what you would document in terms of services



# Visit Writing Session

## Sharing is Caring!

1. What do YOU consider key points of a good visit note?
  2. What do YOU think are commonly missed points of a visit note?
  3. What challenges with documentation do you encounter?
  4. Remembering that visit notes must, if pulled for an audit, substantiate medical necessity and that an AHCCCS approved service was provided.
- A doula service is one provided by a doula, who is a trained nonmedical professional who provides continuous physical, emotional, and informational support to families before, during, and after childbirth for a period of one year after birth or in the case of loss, and who may serve as a liaison between the birth parents and medical and social services staff to improve the quality of medical, social, and behavioral outcomes.



# Visit Writing Session

## Sharing is Caring!

1. We will take 3 scenarios and do 3 visit notes.
2. Scenarios will come from YOU! Please let's have 3 volunteers to share a scenario to write a visit note on.
3. Get in small groups to write visit notes together, collectively.
4. Discussion





**Part 4: Liability Insurance, CPR, First Aid,  
Fingerprint Clearance Card, and  
Continuing Education Units (CEUs) or  
Other Training Opportunities of Interest**

# Liability Insurance

## Liability Insurance

Doulas are not required to carry liability insurance in order to register with AHCCCS.

- Per the AHCCCS Doula FAQ:

**Q12:** Are state-certified doulas required to carry liability insurance?

**A12** No. State-certified doulas are not required to carry liability insurance when becoming an AHCCCS registered provider.

- However, carrying liability insurance (malpractice insurance) helps a doula to protect their personal assets and ensures that legal fees, possible settlement monies, and judgements arising from negligence accusations will be covered.
- Many healthcare facilities, like hospitals and birthing facilities, require doulas to carry liability insurance to work within them.
- Doulas do not need malpractice insurance, which is used by medical professionals like physicians, physician assistants, paramedics, etc.
- Since doulas do not perform medical tasks, if they carried insurance it would be professional liability.



A tall saguaro cactus stands against a clear blue sky. The cactus is green with characteristic ribbing and has several arms. The image is positioned on the left side of the slide, partially overlapping the white background.

# Liability Insurance

## Reasons a Doula May Choose Liability Insurance Anyway

Please note that while insurance is not currently required by either ADHS or AHCCCS for doulas, a doula may desire to carry insurance anyway.

Professional liability insurance, sometimes referred to as “errors and omissions insurance,” covers you in case a client accuses you of inadequate or negligent services.

Liability insurance is required in specific settings, such as:

- **Hospitals:** They often require all birth workers, including doulas, to have liability insurance.
- **Doula-Specific Groups:** Many doula collectives or agencies require insurance as part of their membership agreements.
- **Reimbursement:** If you’re working with clients through health insurance, especially programs like TRICARE, liability insurance might be a requirement to secure reimbursement for your services.

# Liability Insurance

## Liability Insurance

- Please note that neither the AACIHC nor ITCA nor any other agency presenting today is *endorsing* these liability insurance companies. They are offered merely as examples of some possible avenues for pursuing liability insurance.



# Liability Insurance

## Liability Insurance

- [CM&F Group](#)
  - Professional liability for birth and postpartum doulas. This **does not** cover home births, so is best for doulas working in clinic/hospital settings.
- [Alternative Balance](#)
  - Professional liability insurance that covers homebirths, supports doulas who work independently or in non-traditional settings.
- [Van Wagner Group](#)
  - Professional liability insurance that covers homebirths, supports doulas who work independently or in non-traditional settings.

**Source:** <https://doulaofficehours.com/understanding-liability-insurance-for-doulas-what-you-need-to-know/>

# Continuing Education Units (CEUs)

Continuing Education for Doulas is important to ensure necessary skills are kept up.



# Continuing Education Units (CEUs)

Pursuant to [R9-16-905](#):

A. A certified doula shall complete 15 hours of continuing education hours within the three years prior to renewing certification specified in [A.R.S. § 36-766.01](#).

B. Continuing education shall:

1. Directly relate to doula core competencies as specified in [R9-16-901\(9\)](#) including services, skills, and knowledge that:
  - a. Facilitates access to quality of care delivery and health outcomes for clients receiving services; and
  - b. Expands health and wellness in diverse communities to reduce health disparities;
2. Have educational objectives that exceed an introductory level of knowledge related to doula core competencies and scope of practices; and



# Continuing Education Units (CEUs)

3. Consist of courses related to core competencies, such as:
  - a. Health and social service systems, including disease prevention to help manage health conditions;
  - b. Health promotion education;
    - i. Health literacy and cross-cultural communication;
    - ii. Referrals and providing follow-up;
    - iii. Individual support and coaching;
    - iv. Outreach methods and strategies;
  - c. Client and community assessment;
  - d. Health education for behavior change;
  - e. Provide direct services;
  - f. Home visits to provide education, assessment, and social support; and
  - g. Support, advocacy, and health system navigation for clients.
- C. A [continuing education course](#) developed, endorsed, or sponsored by the Department according to [A.R.S. § 36-766.09\(B\)](#) is available at [www.azdhs.gov](http://www.azdhs.gov).



# Continuing Education Units (CEUs)

## Doula Training Program List:

- <https://www.azdhs.gov/documents/licensing/special/doulas/doula-approved-education-and-training-requirements.pdf?v=20240605>

Updates are added to the ADHS webpage:

- <https://www.azdhs.gov/licensing/blpo/doulas/index.php#continuing-education>



# CPR and First Aid

## Cardiopulmonary Resuscitation (CPR) and First Aid

- <https://www.azdhs.gov/documents/licensing/special/doulas/doula-approved-education-and-training-requirements.pdf?v=20240605>

To become voluntarily certified through ADHS, a doula must have documentation from a course recognized by the American Heart Association for the following:

- First Aid, *and*
- Cardiopulmonary Resuscitation (CPR)

To find a first aid and CPR course recognized by the AHA, go to: <https://cpr.heart.org/en/>

- Please note that [Neonatal Resuscitation Program \(NRP\)](#) certification used to be a requirement but no longer is. However, it *is* an excellent course and highly recommended.



Sources: ADHS website; ADHS representative spoken to in special licensing division; photo credit is Unknown Author is licensed under [CC BY-SA](#)

# CPR and First Aid

Clarification was received through ADHS regarding First Aid and CPR certification.

## First Aid

- A First Aid course recognized by the American Heart Association (AHA) *must be on file* for all doulas, **even if the doula has a higher provider level certification**. This is due to the first aid requirement being incorporated as a separate item in State of Arizona regulations.

### What does this mean?

- An LPN or EMT, who is also a doula, would still have to take and maintain a separate First Aid certification, even though they have a higher provider level certification.



# CPR and First Aid

Clarification was received through ADHS regarding First Aid and CPR certification.

## Cardiopulmonary Resuscitation (CPR)

- A CPR course recognized by the American Heart Association (AHA) *must be on file* for all doulas.
  - It is *very important* that you make sure the CPR course you take is hosted by an organization recognized by the AHA.
  - You can safely find recognized organizations by: <https://cpr.heart.org/en/>



# CPR and First Aid

## Cardiopulmonary Resuscitation (CPR)

Please note there are multiple CPR certifications available.

### 1. Basic Life Support (BLS)

- This was formerly known as Basic Life Support for Healthcare Professionals.
- We **highly recommend this course for doulas as it is more comprehensive.**
- This course is intended for Healthcare Professionals who may require a completion card for their job. Topics include CPR and AED, Basic or Advanced Cardiovascular Life Support, Stroke training, and more.
- Additionally, if, in the future, there are any changes to the requirements for CPR, it is more likely that this will be the accepted certification.

### 2. Heartsaver

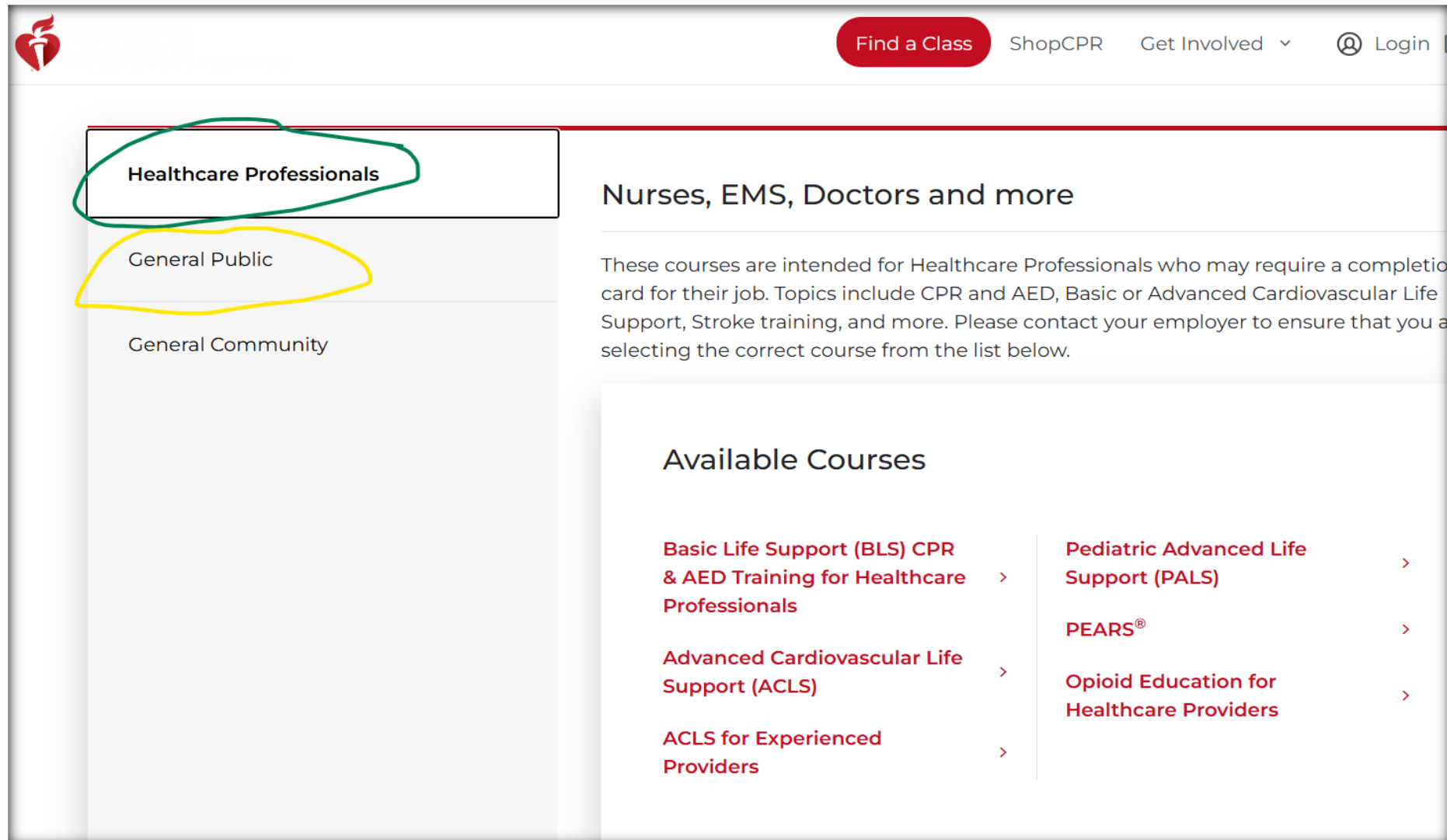
- This is the CPR course intended for anyone with little or no medical training who requires a course completion card for job, regulatory (e.g., OSHA), or other requirements.

***Currently, both the BLS and Heartsaver CPR certifications are accepted, per the ADHS Special Licensing Division.***

# CPR and First Aid

## Cardiopulmonary Resuscitation

- <https://cpr.heart.org/en/course-catalog-search#whichcourse>



The screenshot shows the American Heart Association's CPR course catalog search page. The navigation bar includes the AHA logo, a search bar, and buttons for "Find a Class", "Shop CPR", "Get Involved", and "Login". The left sidebar contains three filter options: "Healthcare Professionals" (highlighted with a green circle), "General Public" (highlighted with a yellow circle), and "General Community". The main content area is titled "Nurses, EMS, Doctors and more" and contains a paragraph explaining that these courses are for healthcare professionals who may need a completion card. Below this is a section titled "Available Courses" with a list of course options, each with a right-pointing chevron:

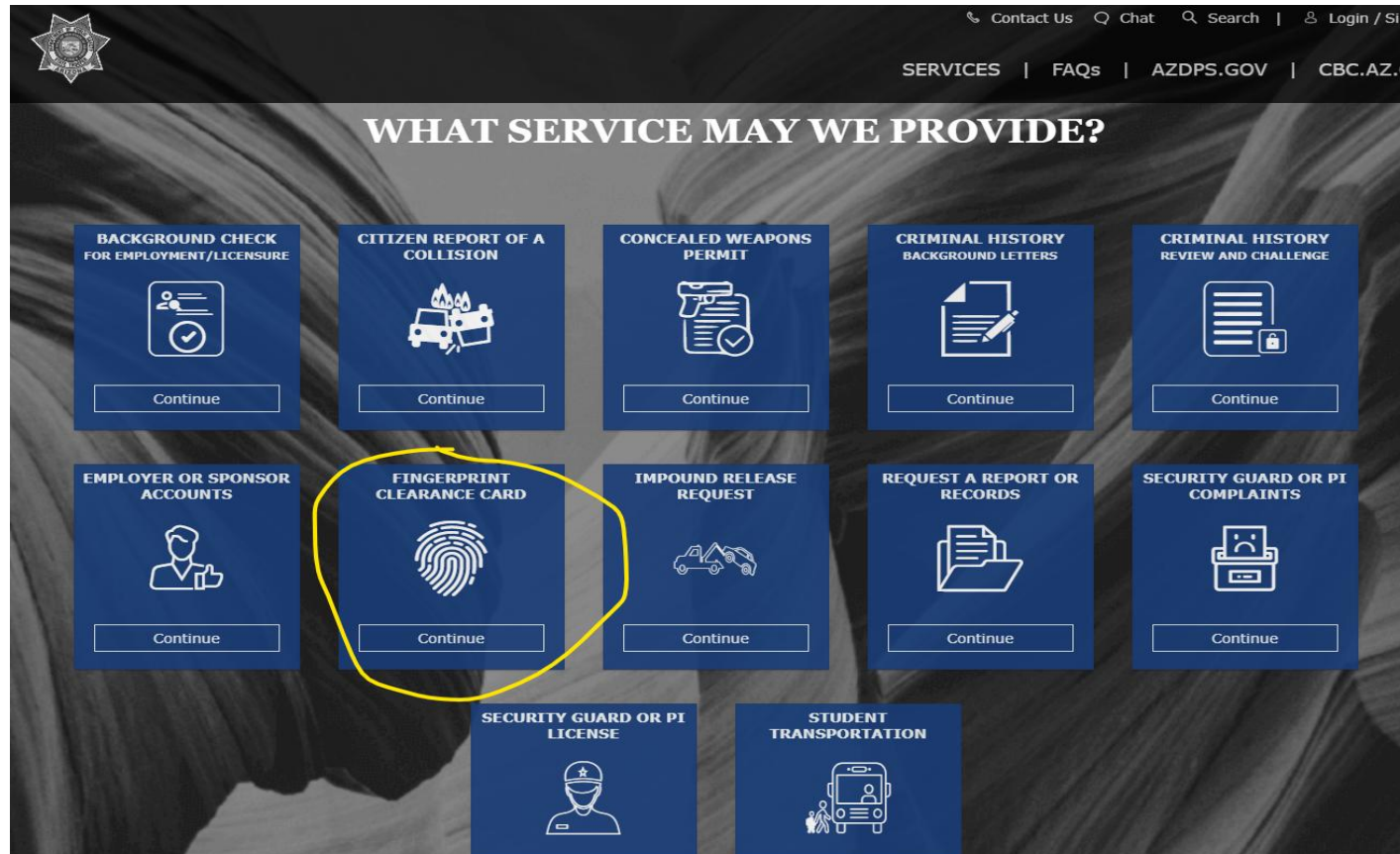
- Basic Life Support (BLS) CPR & AED Training for Healthcare Professionals >
- Advanced Cardiovascular Life Support (ACLS) >
- ACLS for Experienced Providers >
- Pediatric Advanced Life Support (PALS) >
- PEARS® >
- Opioid Education for Healthcare Providers >

# Fingerprint Clearance Cards

Please note that fingerprint clearance cards are awarded through the Department of Public Safety.

You can find the information on fingerprint clearance cards on the DPS website at: <https://www.azdps.gov/services/public-services-center/fingerprint-clearance-card>

- You start the application process here: <https://psp.azdps.gov/>



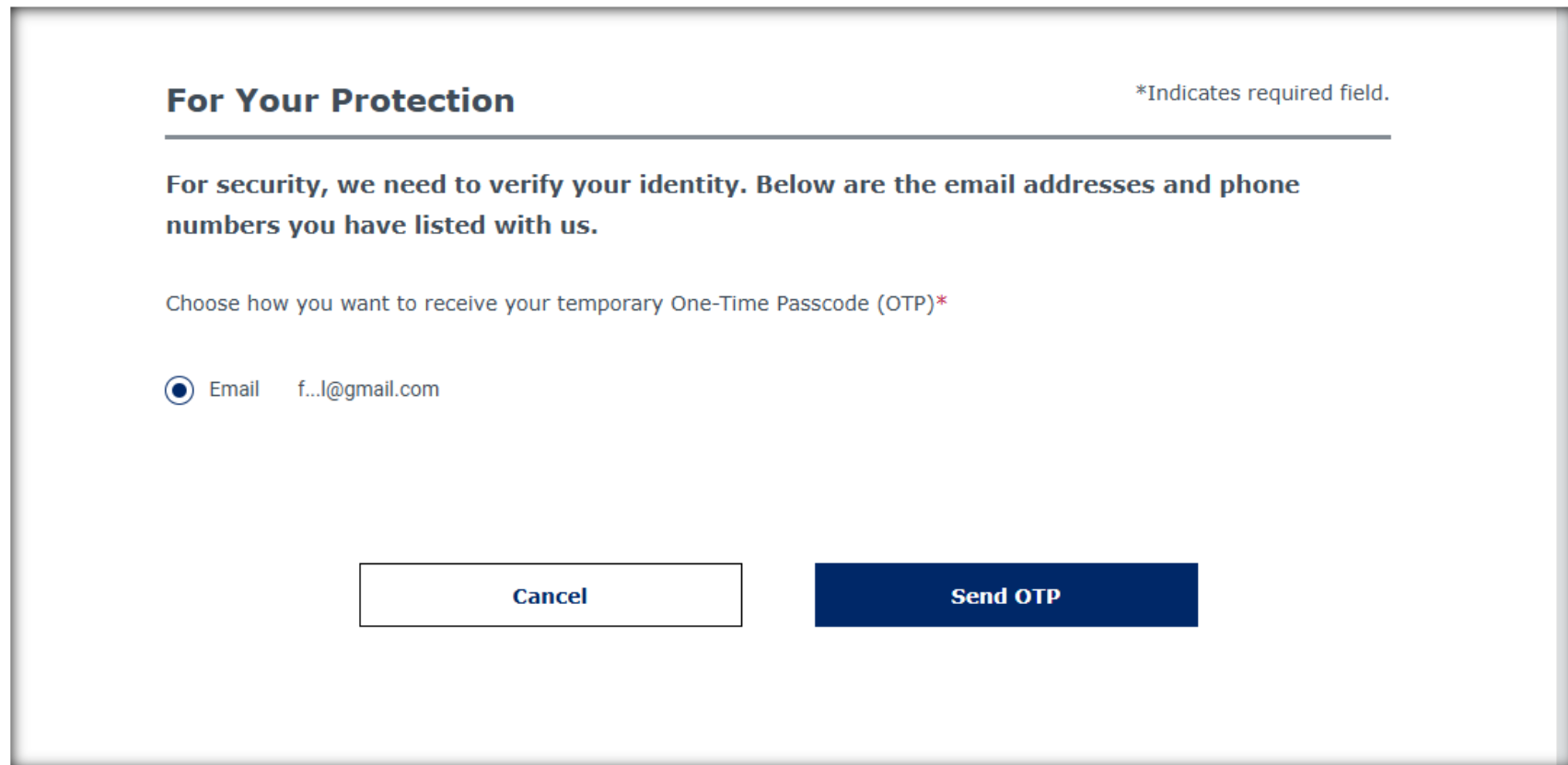
Sources: ADHS website; ADHS representative spoken to in special licensing division

# Fingerprint Clearance Cards

Screenshots of the process can be found in the following DPS document:

- <https://www.azdps.gov/sites/default/files/2025-04/How%20do%20I%20apply%20for%20a%20new%20fingerprint%20clearance%20card.pdf>

You may receive a request to do additional security verification when you are logging on. It will look something like this.



**For Your Protection** \*Indicates required field.

---

**For security, we need to verify your identity. Below are the email addresses and phone numbers you have listed with us.**

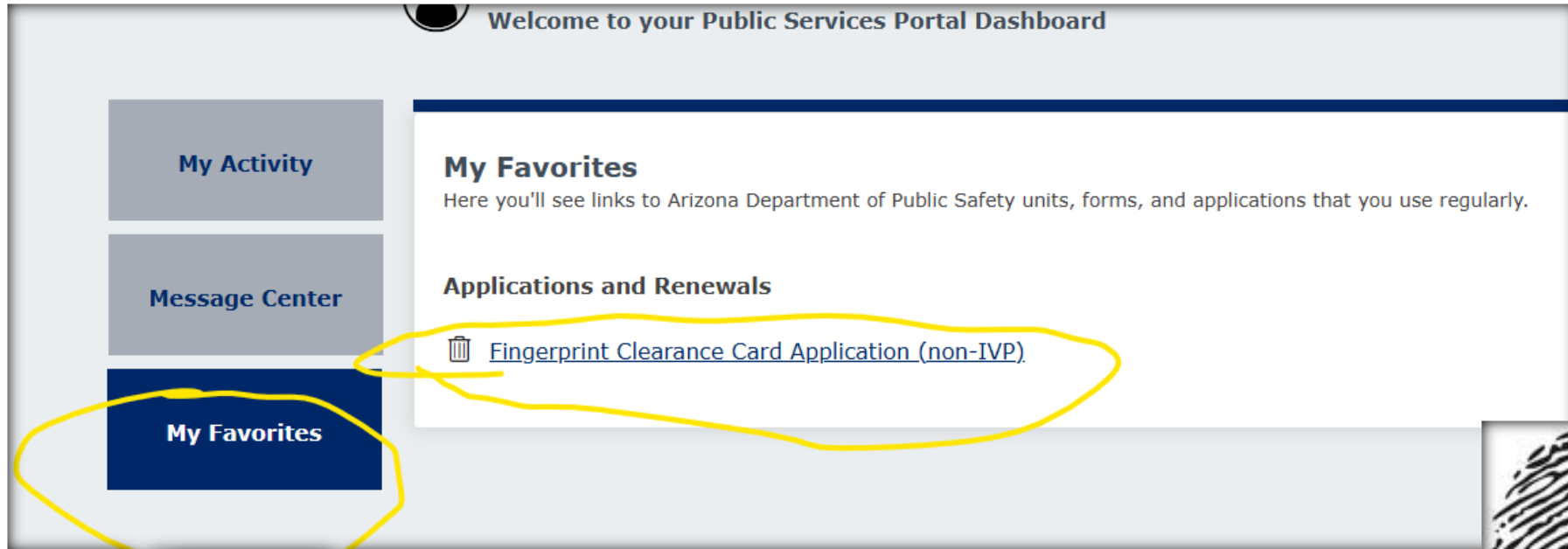
Choose how you want to receive your temporary One-Time Passcode (OTP)\*

Email f...l@gmail.com

Sources: ADHS website; ADHS representative spoken to in special licensing division

# Fingerprint Clearance Cards

Under My Favorites you may find the application once logged in.



Welcome to your Public Services Portal Dashboard


**My Activity**

**Message Center**

**My Favorites**

**My Favorites**  
Here you'll see links to Arizona Department of Public Safety units, forms, and applications that you use regularly.

**Applications and Renewals**

 [Fingerprint Clearance Card Application \(non-IVP\)](#)

The screenshot shows a web dashboard with a sidebar on the left containing three menu items: 'My Activity', 'Message Center', and 'My Favorites'. The 'My Favorites' item is highlighted with a yellow circle. The main content area has a header 'Welcome to your Public Services Portal Dashboard' and a section titled 'My Favorites' with a sub-header 'Applications and Renewals'. Under this section, there is a link 'Fingerprint Clearance Card Application (non-IVP)' with a trash icon to its left. A yellow circle highlights the link text.



Sources: ADHS website; ADHS representative spoken to in special licensing division

# Fingerprint Clearance Cards

## Attest to the Privacy Act Statement

or rule, procedure or standard established by the National Crime Prevention and Privacy Compact Council.

To obtain a copy of your Arizona criminal history record to review, update or correct, you can contact Arizona Department of Public Safety Criminal History Records Unit at (602) 223-2222 or go to <https://psp.azdps.gov> and choose "Criminal History Review and Challenge" from the Services Menu to file your Review and Challenge on-line.

By signing the background check for employment/licensure application, you are acknowledging you have read this "Privacy Act Statement".\*

Cancel

Save

Continue

Sources: ADHS website; ADHS representative spoken to in special licensing division

# Fingerprint Clearance Cards

Choose the DHS –  
Doula Certificate as the  
reason for applying.

## Department of Health Services (DHS)

- DHS - Child Care Group Home; Certification ARS § 36-897.01 and ARS § 36-897.03
- DHS - Child Care Personnel ARS § 36-883.02
- DHS - Child Care Facility Licensure ARS § 36-882
- DHS - Children's Behavioral Health Programs ARS § 36-425.03
- DHS - Residential or Nursing Care Institutions; Home Health Agencies ARS § 36-411
- DHS - Nursing Care Administrators and Assisted Living Facility Managers ARS § 36-446.04
- DHS - Child Care and Vulnerable Adult Facilities Inspections - ARS § 36-113.E
- DHS - IT Positions and/or Access to Vital Records - ARS § 36-113.A
- DHS - Doula Certificate - ARS §36-766.01
- DHS - Audiologist Licensure - ARS § 36-1940
- DHS - Speech-Language Pathologist Licensure - ARS § 36-1940.01
- DHS - Sober Living Homes ARS § 36-2069

# Fingerprint Clearance Cards

Costs are around (between the fee at checkout and the fingerprinting fee) \$100.

Screenshots of the full process are on the DPS website at:

- <https://www.azdps.gov/sites/default/files/2025-04/How%20do%20I%20apply%20for%20a%20new%20fingerprint%20clearance%20card.pdf>

DPS phone number for questions is: [\(602\) 223-2000](tel:6022232000)



# Resources



# Resources: Doula-Specific Pages

## ADHS Home Page for Doulas

- <https://www.azdhs.gov/licensing/blpo/doulas/index.php>

## ADHS Licensing for Doulas

- <https://www.azdhs.gov/licensing/blpo/doulas/index.php#licensing-information-and-application-checklist-and-forms>

## ADHS Initial Application Checklist:

- <https://www.azdhs.gov/documents/licensing/special/doulas/doula-initial-application-checklist.pdf?v=20250801>

## Doula Fee Table:

- <https://www.azdhs.gov/documents/licensing/blpo/doulas/doula-fee-table.pdf>

## AHCCCS Billing Doula FAQ:

- <https://www.azahcccs.gov/PlansProviders/Downloads/OtherProviderProgramsAndInitiatives/DoulaFAQs.pdf>

## AHCCCS Doula Training

- <https://www.azahcccs.gov/Resources/Downloads/DFSMTraining/2025/DoulaServices.pdf>



# Resources: Doula-Specific Pages

## Doula Fact Sheet for House Bill 2670

- <https://www.azleg.gov/legtext/54leg/2R/summary/S.2670HHS.DOCX.htm>

## American Heart Association (AHA)

- Find a course: <https://cpr.heart.org/en/course-catalog-search#whichcourse>

## Department of Public Safety (Fingerprinting)

- (602) 223-2000
- <https://www.azdps.gov/services/public-services-center/fingerprint-clearance-card>

## Arizona Department of Health Services (ADHS) – Bureau of Professions and Occupations

- Department of Health Services
- 150 North 18th Avenue, Suite 410  
Phoenix, AZ 85007
- **Telephone:** [602-364-2079](tel:602-364-2079)
- **Fax:** [602-364-4769](tel:602-364-4769)
- **Email:** [blpo@azdhs.gov](mailto:blpo@azdhs.gov)



# Resources: ADHS Forms for Applications

ADHS forms that are required when completing your application, including initial (new) applications and renewal applications.

## All applications

- [Code of Ethics Agreement](#)
- [High School/High School Equivalency Attestation](#)

## Initial applications

- [Birth Observation Form](#)
- [Letters of Recommendation Form](#)
- [Primary Doula Attestation](#)
- [Doula Competency Attestation](#) (if applicable)

## Reciprocity initial applications

- [Reciprocity Doula Application Checklist](#)
- [Reciprocity Doula Application](#)
- [Attestation of Licensure in Another State](#)

## Renewal applications

- [Continuing Education Attestation](#)

# Important Portals and Reference Publications

## Important Portals

- **AHCCS Provider Enrollment Portal (APEP):** [www.azahcccs.gov/APEP](http://www.azahcccs.gov/APEP)
- **AHCCCS Online Provider Portal:**  
<https://ao.azahcccs.gov/Account/Login.aspx?ReturnUrl=%2f>
- **Service Now Portal:** <https://servicenow.azahcccs.gov/login>
  - Login Guide: <https://files.constantcontact.com/e048dc60601/46b31060-73d4-4ba4-81de-e0552728bdcd.pdf>
  - Portal information: <https://files.constantcontact.com/e048dc60601/9b779a9a-e8df-467f-b46f-d71994857ab1.pdf>

## AHCCCS Reference Publications

- AHCCCS Doula Webpage:
  - <https://www.azahcccs.gov/PlansProviders/OtherProviderProgramsAndInitiatives/Doula.html>
- AHCCCS FAQs on Doula Reimbursement:
  - <https://www.azahcccs.gov/PlansProviders/Downloads/OtherProviderProgramsAndInitiatives/DoulaFAQs.pdf>

# Important Reference Publications

## AHCCCS Reference Publications

- Fee-for Service (FFS) Provider Billing Manual, Chapter 5, CMS 1500 Claim Form and Claim Submission Requirements:
  - [https://www.azahcccs.gov/PlansProviders/Downloads/FFSProviderManual/FFS\\_Chap05.pdf](https://www.azahcccs.gov/PlansProviders/Downloads/FFSProviderManual/FFS_Chap05.pdf)
- Fee-for-Service (FFS) Provider Billing Manual, Chapter 10, Individual Practitioner Services (Pages 7-10)
  - [https://www.azahcccs.gov/PlansProviders/Downloads/FFSProviderManual/FFS\\_Chap10.pdf](https://www.azahcccs.gov/PlansProviders/Downloads/FFSProviderManual/FFS_Chap10.pdf)
- AHCCCS Trainings on AHCCCS Online Provider Portal:
  - How to Submit a CMS 1500/Professional Claim Using the AHCCS Online Provider Portal:  
[https://www.azahcccs.gov/Resources/Downloads/DFSMTraining/2023/ProfessionalClaim\\_AHCCCSOnline.pdf](https://www.azahcccs.gov/Resources/Downloads/DFSMTraining/2023/ProfessionalClaim_AHCCCSOnline.pdf)
- Service Now/EDI Portal Information:
  - <https://files.constantcontact.com/e048dc60601/9b779a9a-e8df-467f-b46f-d71994857ab1.pdf>

# Important Reference Publications

## AHCCCS Reference Publications

- AHCCCS Trainings on AHCCCS Online Provider Portal:
  - How to Status a Claim Using the AHCCCS Online Provider Portal:  
[https://www.azahcccs.gov/Resources/Downloads/DFSMTraining/2023/HowToStatusClaim\\_AHCCCSOnline.pdf](https://www.azahcccs.gov/Resources/Downloads/DFSMTraining/2023/HowToStatusClaim_AHCCCSOnline.pdf)
  - Correcting Claims, Voiding Claims and Replacing Claims:  
[https://www.azahcccs.gov/Resources/Downloads/DFSMTraining/2023/CorrectingSubmission\\_VoidsAndReplacements.pdf](https://www.azahcccs.gov/Resources/Downloads/DFSMTraining/2023/CorrectingSubmission_VoidsAndReplacements.pdf)
    - **VERY IMPORTANT:** Remember that if you are past timely filing you need to be extremely careful when it comes to voiding/replacing claims. Do *not* void a claim if it's past the 6 month mark. Instead do a correction or “replace” the claim.
- AHCCCS Trainings on Service Now/EDI Portal:
  - <https://files.constantcontact.com/e048dc60601/9b779a9a-e8df-467f-b46f-d71994857ab1.pdf>

A scenic view of a desert landscape. In the foreground, several tall saguaro cacti are visible, some with arms. The middle ground shows a range of rugged, rocky mountains. The sky is a clear blue with scattered white clouds. The overall lighting suggests a bright, sunny day.

Thank you!