



**Blue Cross  
Blue Shield**  
of Rhode Island

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April 14, 2021

The Honorable Marvin Abney, Chair  
House Committee on Finance  
Providence, RI 02903

RE: HB 5929, An Act Relating to Human Services - Medical Assistance - Perinatal Doula Services

Dear Chairman Abney and Members of the House Committee on Finance:

On behalf of Blue Cross & Blue Shield of Rhode Island (Blue Cross), I am writing to express **strong support** for doulas, the benefits of the services they provide, and for this legislative proposal.

Blue Cross shares the sponsor's interest in improving access to doulas and the care they provide. We recognize doulas can improve healthy outcomes and the likelihood of a positive childbirth experience. Importantly, doulas can reduce the risks a woman might experience based on her racial, ethnic, and socioeconomic status. Blue Cross is exploring how to best integrate these services into commercial coverage.

We are very appreciative of the conversations we have had with the sponsor, Representative Marcia Ranglin-Vassell, and co-sponsor Representative Liana Cassar, as well as Leader Blazewski, in addition to the other health care professionals engaged in assisting women through pregnancy, delivery, and post-partum. We are grateful for their leadership and look forward to additional conversations to determine how to best provide coverage for doulas and to make their services more widely available.

Reflecting our interest in the proposal, we shared an amendment proposing to address two concerns. First, to minimize the financial risk to the State of this being deemed a new mandate. Under the federal Affordable Care Act, section 1311(d)(3)(B), the State could have liability to defray the costs of any new state-mandated benefits for plans in the individual and small group market. Second, the amendment removes text which would purport to regulate private insurance within the Medicaid (Human Services) statute, and instead incorporate the provision into the appropriate chapters of Title 27. We look forward to conversations with the sponsors and advocates on language to minimize that liability and maintain the distinction between Medicaid and commercial, or private, insurance.

Again, Blue Cross supports legislation making doula services more widely available and covered by Medicaid and commercial plans. We appreciate the consideration of our thoughts on the legislation and the work needed to implement coverage. Please feel free to contact me if you have any questions.

Sincerely,

*Richard Glucksman, Esq.*  
Assistant General Counsel

Cc: Representative Ranglin-Vassell and Representative Liana Cassar