



November 4, 2025

Oregon Division of Financial Regulation  
Department of Consumer and Business Services  
350 Winter St. NE  
Salem, OR 97301  
Attn: Numi Griffith

**Subject:** Moda Health Plan, Inc. Comments on Perinatal Services, Senate Bill 692

Moda Health Plan, Inc. (Moda) appreciates the opportunity to provide comment on the Department of Consumer and Business Services' (DCBS) Division of Financial Regulation (DFR) efforts to adopt rules to implement Senate Bill 692 (2025), Perinatal Services. In this letter, Moda provides feedback and suggestions regarding the rules that were proposed on October 30, 2025 and the associated memo relating to lactation professionals.

### **Lactation Professionals Memo**

Moda supports DCBS' approach to limiting the temporary rules effective January 1, 2026, to the coverage of doula services given the Oregon Health Authority's delay in conducting scope of practice rulemaking for lactation professionals.

### **"Doula" Definition and Meaning**

Moda has concerns with the definition of "doula" in the bill and the associated proposed rules. The Oregon Health Authority (OHA) worked to create a certification program which helps to ensure proper state oversight of doulas and create a standard of care to ensure Oregonians seeking doula services receive services from qualified professionals. In the absence of any certification requirements being placed on doulas, insurers are forced to reimburse any individual claiming to be a "trained professional", which may or may not be the case. In addition, the lack of certification requirements could result in a lack of oversight of doulas in the state which in turn could have negative effects on the quality of services obtained by Oregonians. Lastly, Moda believes that doulas providing services and billing commercial insurance should be subject to the same requirements as other healthcare providers in Oregon. This means that doulas should be required to obtain a certification or license from the state in order to practice.

To ensure Oregonians on commercial insurance plans are receiving services from a licensed, registered, and qualified individual, and to avoid insurers reimbursing individuals who are not certified or qualified to provide doula services, Moda recommends adding OHA registration and certification requirements for doulas to the final rule.

*Health plans provided by Moda Health Plan, Inc.*

## **Doula Reimbursement**

Moda thanks DCBS for clarifying that the \$3,760 reimbursement amount listed in the bill is a minimum payment cap and not a payment minimum. Moda appreciates the flexibility this clarification gives insurers to set a reimbursement cap on doula services of not less than \$3,760, to set a higher reimbursement cap if desired, or to not set a reimbursement cap on these services.

Moda also appreciates DCBS coordination with the Oregon Health Insurance Marketplace to revise the 2026 Standard Plans to set a uniform cap of \$3,760 for doula services. This revision will be important to ensure proper reimbursement alignment across insurers for the Standard Plans.

Moda would like to obtain clarification via the final rules on the following questions below:

- If an insurer sets a reimbursement cap on doula services, is the reimbursement cap meant to be applied on an annual basis (e.g. annual benefit max for subscriber and dependents is \$3,760)?
- Is the reimbursement cap minimum outlined in the bill and the draft rules meant to include or exclude the member cost sharing amounts paid to the doula providing the services?

## **Minimum Coverage Requirement: Hours**

During the RAC meeting on October 30<sup>th</sup> the difference between the hourly billing methodology and OHA current billing methodology for doula services was discussed. During the conversation, potential complications were identified arising from billing hourly (as outlined in the bill and proposed rules) versus billing globally or billing per visit (OHA methodology). From an operational standpoint for both insurers and doulas, it makes sense to follow the previously established OHA billing methodology (bundled or itemized) as opposed to hourly billing. Moda recommends that the rules be revised to align with the OHA methodology currently in place or that the potential legislative fix address this issue in the 2026 Legislative session.

## **Member Communication Regarding Doula Services**

Moda appreciates the flexibility in the proposed rules relating to the member notification requirement outlined in SB 692. Moda supports a flexible approach and the use of insurer discretion on how best to notify members of the availability of doula services.

Thank you for the opportunity to provide comments during this rulemaking process.

Sincerely

*Scott White*

Scott White  
Director, Regulatory Affairs

