

November 12, 2024

Douglas as a VT Licensed Profession
Vermont Office of the Secretary of State Office of Professional Regulation
89 Main Street, 3rd Floor
Montpelier, Vermont 05602

Dear Members of the Office of Professional Regulation,

Blue Cross and Blue Shield of Vermont (Blue Cross VT) appreciates the opportunity to submit this comment as the Office of Professional Regulation reviews the regulation of doula services and licensing requirements for doula providers in Vermont. As Vermont's local, non-profit health plan, our mission is to make healthcare work better for Vermonters, with a strong commitment to health equity, access, and health reform. As part of the larger Blue Cross Association, we are aligned with its national health equity strategy, which aim to address racial health disparities across the United States. A key priority within this strategy is reducing racial disparities in maternal health, and it is in support of this goal that we express our ongoing commitment to enhancing access to and affordability of maternal care.

At Blue Cross VT, we recognize the value of doula services in supporting positive maternal health outcomes. We are piloting a doula services program, currently providing access to doulas for thirty underserved, marginalized, and/or high-risk childbearing individuals. This pilot allows us to survey participants about their experiences and assess the impact of doula services on their care and outcomes, providing valuable insights for future initiatives in our Vermont communities. The pilot is ongoing, and we look forward to conducting a formal analysis to evaluate its results.

Access to doula services aligns with our mission and strategic goals of improving maternal health, particularly by enhancing access for marginalized communities. Pending the results of our doula pilot, Blue Cross of Vermont does not take a position on the regulatory framework. If doulas become a licensed profession in Vermont, we recommend standards of training, certification, credentialing, liability insurance, continuing education, and a requirement for National Provider Identification (NPI) numbers for claim transactions. We remain committed to advancing maternal health equity and ensuring that all Vermonters have access to high-quality, culturally appropriate care.

Thank you for considering our comments.

Sincerely,


Tom Weigel, MD (Nov 12, 2024 12:56 EST)

Tom Weigel, MD | Vice President & Chief Medical Officer
Blue Cross and Blue Shield of Vermont
www.bluecrossvt.org
P.O. Box 186 • Montpelier, VT 05601-0186