

Policy Key: Childbirth Support and Breastfeeding Counseling

TriWest Clinical Operations – TRICARE West

SCOPE

This Policy Key outlines the criteria for determining medical necessity for services covered under the Childbirth and Breastfeeding Support Demonstration and Breastfeeding Counseling services in accordance with TRICARE benefit. [1,2]

NOT COVERED [1,2]

- **Certified Labor Doula (CLD) and Breastfeeding Support Services Demonstration are not covered for the following beneficiaries [1]:**
 - Uniformed Services Family Health Plan (USFHP),
 - Continued Health Care Benefits Program (CHCBP),
 - and those with TRICARE **AND** Medicare coverage.
- **CLD Services [1]:**
 - Beneficiaries who give birth in direct care/at Markets/Military Medical Treatment Facilities (MTFs). On a case-by-case basis, doula services provided prior to the birth for a beneficiary if it is determined that the beneficiary, at the time of service, did not intend to give birth in direct care/at a Market/MTF.
 - Services for deliveries performed or planned to be performed by a provider that is not TRICARE-authorized (e.g., a lay midwife or a planned unattended childbirth), except in emergency circumstances.
 - Services at an elective abortion not otherwise covered by TRICARE.
 - Services, other than childbirth support services, performed by a CLD unless the CLD also meets the requirements for a class of provider authorized to provide those services (e.g., a CLD cannot bill separately for lactation services unless the provider also meets the requirements for a lactation consultant or lactation counselor under this demonstration).
 - Services that are not personally performed and/or services performed via telehealth.
- **Breastfeeding Support [1,2]:**
 - Services performed by a certified lactation consultant or certified lactation counselor other than breastfeeding counseling services unless the certified lactation consultant or certified lactation counselor also meets the requirements for a class of provider authorized to provide those services (e.g., a lactation consultant/counselor cannot provide E&M services unless the provider also meets the requirements for an individual professional provider under TRICARE statute, regulation, and policy). [1]

- Services by breastfeeding peer counselors, lactation educators, or other lactation specialists not meeting the qualification requirements under this demonstration for a certified lactation consultant or certified lactation counselor. [1]
- The infants or infants, if multiples, are not eligible for separate breastfeeding counseling services [2].
- Postpartum childbirth support visit and a breastfeeding support visit **at the same encounter**, even if the provider is both a CLD and a certified lactation consultant or certified lactation counselor.
- Services of a CLD, certified lactation consultant, or certified lactation counselor that is an immediate family member of the beneficiary. [1]

COVERAGE CRITERIA

Certified Labor Doula (CLD) Services [1]

Initial Level of Review may approve for pregnant beneficiaries with a gestational age over 20 weeks enrolled in TRICARE Prime or Select:

- When the beneficiary is under the care of a TRICARE-authorized provider (e.g., an obstetrician, a CNM, etc.) for the maternity episode of care.
- In Person Antepartum and Postpartum Care Visits include up to a combined total of six visits by a CLD before and after birth.
- In Person Continuous Labor Support. The benefit includes continuous labor support from a CLD during labor and delivery once per birth event.
- CLD must meet required qualifications, see Definitions for reference.

NOTE: Beneficiaries enrolled in TRICARE Prime and TRICARE Select **outside** the 50 United States (U.S.) and the District of Columbia (OCONUS) are not eligible to participate in the demonstration until the demonstration expands overseas, even if they receive care in the 50 U.S. or the District of Columbia (CONUS).

Breastfeeding Support

Initial Level of Review may approve:

- **All pregnant TRICARE beneficiaries** beginning at the 27th week of pregnancy (third trimester) or birth of a child if prior to 27 weeks, or female beneficiary who legally adopts an infant and intends to personally breastfeed the adopted infant for:
 - **Up to six individual outpatient breastfeeding/lactation counseling sessions** per birth event, in addition to breastfeeding/lactation counseling that may be provided during an inpatient maternity stay, outpatient OB visit, or well-child visit,
 - And meets **ALL** the following:
 - The breastfeeding/lactation counseling is billed using one of the preventive counseling CPT procedure codes 99401-99404; **AND**
 - Breastfeeding/Lactation counseling is the only service being provided; **AND**

- The breastfeeding/lactation counseling is rendered by a TRICARE-authorized individual professional provider (e.g., physician, physician assistant, nurse practitioner, nurse midwife, or registered nurse), outpatient hospital, or clinic.
- Beneficiaries enrolled in **TRICARE Prime or Select** for breastfeeding support covered services under the Demonstration [1]:
 - **In person or remote individual breastfeeding counseling sessions.**
 - The breastfeeding parent is entitled to a total of six breastfeeding dyad sessions provided by a TRICARE-authorized provider under the existing breastfeeding counseling benefit, a provider authorized under this demonstration, **or a combination of both.**
 - Only the breastfeeding parent is eligible for breastfeeding counseling.
 - **In Person or Remote Group Breastfeeding Counseling including Prenatal Breastfeeding Education** when performed by a lactation consultant, lactation counselor, or other TRICARE-authorized provider (i.e., coverage of group breastfeeding counseling shall not be limited to providers under the demonstration). [1]

NOTE: Refer to Definitions for the required qualifications for Lactation Consultant and Lactation Counselor

DEFINITIONS

Certified Labor Doula (CLD) – A doula certified per the standards of the demonstration project. Labor doulas, sometimes referred to as birth doulas, are extra medical individual providers who aid a birthing parent during the birthing process. They provide support for the birthing parent during labor and may also meet with the birthing parent a few times prior to or after labor. Labor doulas are not medical personnel and do not provide medical services, such as examination of the cervix or prescription of medications, and do not give medical advice. Rather, the labor doula provides physical, emotional, and informational support for the birthing parent during the labor process, supporting the birthing parent during vaginal birth or a cesarean section (C-section). [1]

CLD qualifications are as follows:

- **Education Requirements:**
 - Attended a minimum of 24 education hours to include (and not counting self-paced learning such as reading a book or writing an essay; however, the contractor shall count remote synchronous or asynchronous online courses or in-person courses):
 - The physiology of labor;
 - Labor doula training;
 - Antepartum doula training; and
 - Postpartum doula training.
 - Attended one or more breastfeeding courses.
 - Attended one or more childbirth classes.
- **Experience.** The contractor shall ensure the CLD has, within the last three years:

- Provided continuous in-person childbirth support for at least three childbirths as the primary labor doula supporting the birthing parent, with a minimum of 15 hours over the three childbirths of which at least two of the three births were a vaginal birth.
 - Provided antepartum and postpartum support for at least one birth.
- **Certification Requirement.** Current certification as a CLD, certified doula, or similar perinatal certification (postpartum doula certification by itself does not qualify), obtained within the last three years from one of the following organizations:
 - BirthWorks International
 - Childbirth and Postpartum Professional Association
 - Doulas of North America (DONA) International
 - International Childbirth Education Association
 - National Black Doulas Association
 - Medicaid Participation in Lieu of Certification
 - Effective April 11, 2024, CLDs (Certified Labor Doulas) in states with a permanent, statewide Medicaid doula benefit may use that participation instead of a certification excluding geographically or time limited programs and programs with requirements set by affordable care or managed care organizations.
 - CLD's active enrollment in the state Medicaid doula program. CLDs lose eligibility to participate in the demonstration the day they are no longer active Medicaid providers.
 - CLD will be terminated/suspended/disqualified from the demonstration program if CLD is no longer enrolled in the Medicaid program
 - Medicaid participation can only substitute certification **in the same state** where the CLD is enrolled (e.g., a Medicaid doula in Oregon can't use that qualification to serve TRICARE patients in Florida).
- **License Requirement.** If a state or local jurisdiction offers a doula, childbirth support, or similar licensure or certification, the contractor shall require such a license or certification, even if it is optional in the state or local jurisdiction.
- **CPR Certification.** The contractor shall ensure the CLD maintains a current adult, child, and infant CPR certification.
- **NPI Number.** The contractor shall require the CLD to submit claims under their own NPI number. Overseas providers are exempt from this requirement.
- **Participation Agreement.** To be eligible for reimbursement for dates of service on or after January 1, 2025, CLDs in the 50 U.S. and the District of Columbia must sign a participation agreement.

Lactation Consultant – Lactation consultants are extra medical individual providers who have received specialized training to aid in breastfeeding and infant nutrition from breastmilk. Lactation consultants have the highest level of breastfeeding training and are able to provide a full range of breastfeeding care, and lactation consultant services may be necessary when complex problems surrounding breastfeeding arise.



Lactation Consultant qualifications. Must be at least 18 years old and meet all requirements as follows:

- **Certification Requirement.** The lactation consultant shall hold a current certification as a lactation consultant by one of the following organizations:
 - International Board of Lactation Consultant Examiners. Certification as an International Board Certified Lactation Consultant (IBCLC) qualifies.
 - Academy of Lactation Policy and Practice, Inc. (ALPP). Certification as an Advanced Lactation Consultant or an Advanced Nurse Lactation Consultant qualifies.
- **License requirement.** If a state or local jurisdiction offers a lactation consultant licensure or certification, the contractor shall require such a license or certification, even if it is optional in the state or local jurisdiction.
- **Cardiopulmonary Resuscitation (CPR) certification.** The lactation consultant shall maintain a current adult, child, and infant CPR certification.
- **National Provider Identification (NPI) Number.** The contractor shall require the lactation consultant to submit claims under their own NPI number. Overseas providers are exempt from this requirement.

Lactation Counselor – Lactation counselors are extra medical individual providers who have received specialized training to provide breastfeeding counseling to support normal lactation and breastfeeding parents of healthy, full-term infants.

Lactation Counselor qualifications. A lactation counselor must be at least 18 years old and meet all of the requirements below.

- **Certification Requirement.** The lactation counselor shall hold a current certification by ALPP as a Certified Lactation Counselor.
- **License Requirement.** If a state or local jurisdiction offers a lactation counselor licensure or certification, the contractor shall require such a license or certification, even if it is optional in the state or local jurisdiction.
- **CPR Certification.** The lactation counselor shall maintain a current adult, child, and infant CPR certification.
- **NPI Number.** The contractor shall require the lactation counselor to submit claims under their own NPI number. Overseas providers are exempt from this requirement.

CODES

CPT 99401-99404, T1032, T1033

REFERENCES

[1] TRICARE Operations Manual (TOM), Chapter 18, Section 10 – Childbirth and Breastfeeding Support Demonstration [TRICARE Manuals - Display Chap 18 Sect 10 \(Change 33, Dec 27, 2024\)](#)



[2] TRICARE Policy Manual (TPM), Chapter 8, Section 2.6 – Breastfeeding/Lactation Counseling [TRICARE Manuals - Display Chap 8 Sect 2.6 \(Change 83, Jun 2, 2021\)](#)

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