



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
LANSING

ELIZABETH HERTEL  
DIRECTOR

November 19, 2024

**TO:** Interested Party

**RE:** Consultation Summary Project Number 2410-Maternal - Medicaid  
Coverage of Group Prenatal Care Services

Thank you for your comment(s) to the Behavioral and Physical Health and Aging Services Administration relative to Project Number 2410-Maternal. Your comment(s) has been considered in the preparation of the final publication, a copy of which is attached for your information.

Responses to specific comments are addressed below.

**Comment:** Recommendation to remove the term "low risk pregnancies" to be inclusive of all patients regardless of the level of risk.

**Response:** Thank you for your comment. The term "low risk pregnancies" has been removed.

**Comment:** Recommendation for sites to obtain CenteringPregnancy® accreditation, not individual providers.

**Response:** The policy has been updated to require sites, rather than individual practitioners, to be accredited by the Centering Healthcare Institute.

**Comment** The proposed policy states that each session should be a minimum of 60 minutes which does not follow our model guidelines to give patients the comprehensive care experience they need. Centering Pregnancy® involves a significant shift in the model and schedule of prenatal care because it replaces traditional individual appointments, rather than being overlaid on them like care management visits or other prenatal care enhancements. CHI recommends adding this clarifying language under "Reimbursement Considerations and Billing Guideline."

**Response:** Thank you for your comment. The group session time requirement has been updated to 90-120 minutes.

**Comment:** As stated, we applaud the \$45 per patient per visit enhanced reimbursement using procedure code 99078 with the -TH modifier. We also recommend a one-time \$250 provider retention payment after the completion of five prenatal visits per patient per session resulting in a \$700 enhanced maternity bundle for CenteringPregnancy® per patient, per pregnancy.

**Response:** Thank you for your comment. Michigan Department of Health and Human Services (MDHHS) will consider the use of retention payments in the future.

**Comment:** Recommendation that MDHHS clarify in the final policy if the \$45 reimbursement rate is a flat rate for each session conducted or if providers are reimbursed \$45 for each individual pregnant person who attends the session.

**Response:** Thank you for your comment. The final policy has been updated to clarify that the reimbursement rate is \$45 per session for each Medicaid enrolled pregnant individual in attendance.

**Comment:** Recommendation of a higher reimbursement rate for group prenatal care sessions that have higher number of attendees given the increased time and resources required to accommodate larger class sizes.

**Response:** Thank you for your comment. The reimbursement rate of \$45 is provided for each Medicaid enrolled beneficiary in attendance to support services provided regardless of the group size.

**Comment:** Please clarify whether certified nurse midwives (CNMs) qualify as an advanced practice registered nurse (APRN) under MDHHS' proposed policy and can lead a collaborative group prenatal care session. If not, we request Medicaid-enrolled certified nurse midwives be added as an eligible provider.

**Response:** Collaborative group sessions may be covered when led by a Medicaid-enrolled physician, physician assistant, or APRN (which includes certified nurse midwives).

**Comment:** It is unclear how this provision would apply in instances where the co-facilitators are both clinical professionals. For example, if a physician and a nurse co-facilitated a session, would only one of the providers be eligible to receive Medicaid reimbursement for their services?

**Response:** Correct. The total reimbursement for CenteringPregnancy® group sessions is \$45 and includes all ancillary and supportive services provided during the session regardless of the number of clinical professionals facilitating that session.

**Comment:** We ask MDHHS to clarify how the 2410-Maternal policy intersects with other related Medicaid policies including when community health workers (CHWs) and doulas are also providing services to the pregnant/postpartum individual.

**Response:** Medicaid may reimburse for CHW and/or doula services provided outside of the CenteringPregnancy® session when the CHW or doula's professional services are separate and distinct from the CenteringPregnancy® services.

Thank you for your inquiry. We trust that previous responses addressed the concerns and questions noted. If you wish to comment further, send your comments to Kimberly Lorick at [Lorickk1@michigan.gov](mailto:Lorickk1@michigan.gov).

Sincerely,

A handwritten signature in black ink that reads "Meghan E Groen". The signature is fluid and cursive, with the first name "Meghan" and last name "Groen" clearly legible.

Meghan Groen, Director  
Behavioral and Physical Health and Aging Services Administration