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**Re: Submission - Regional Provider Representative Request - Region 4 - Heather Prestridge**

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**Brudjar - CDPHE, Erica** <erica.brudjar@state.co.us>

To: Heather Prestridge &lt;heather@seasonsbirthcenter.com&gt;

Cc: "Cano-Wilson - HCPF, Pita" &lt;pita.cano-wilson@state.co.us&gt;, Indra Lusero &lt;indra@elephantcircle.org&gt;, Jo Tansey - CDPHE &lt;jo.tansey@state.co.us&gt;

Thu, Jul 20, 2023 at 7:46 AM

Heather,

Thanks for the information.

I've sent this on to my leadership team and hoping the two agency leaderships can come together on this.

Much appreciated,

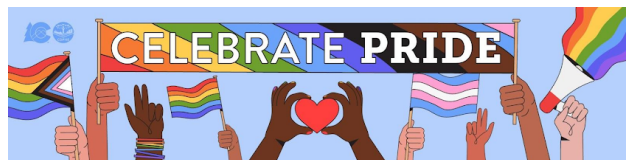
Erica Brudjar, RN, BSN, HACCP-CMS  
Acute Care Section Manager  
Acute and Nursing Facilities Branch  
Health Facilities and Emergency Medical Services Division



**COLORADO**  
Health Facilities & Emergency  
Medical Services Division  
Department of Public Health & Environment

*I am off on Mondays and will reply to emails/phones on my return.*

C 720.347.8829 | F 303.753.6214 |  
4300 Cherry Creek Drive South, Denver CO 80246  
erica.brudjar@state.co.us | www.healthfacilities.info  
"Fidete, sed verificate"



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On Wed, Jul 19, 2023 at 3:45 PM Heather Prestridge <heather@seasonsbirthcenter.com> wrote:

Thank you, Pita - in my meeting with CDPHE they confirmed that Medicaid should be abiding by the notification CDPHE sent, saying we were approved providers as of 2021. I'll let them know that there is a conflict on information between the two agencies that is leaving me in a suspended void.

I understand that you are not personally rejecting me as a provider, and I do appreciate your going back and forth with me to review this issue. I knew coming into the process that it would not necessarily be straightforward.

Thank you for continuing the conversation with me.

*Heather Prestridge, CPM*

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**From:** Cano-Wilson - HCPF, Pita <pita.cano-wilson@state.co.us>

**Sent:** Monday, July 17, 2023 5:14 PM

**To:** Heather Prestridge <heather@seasonsbirthcenter.com>

**Subject:** Re: Fw: Fw: Submission - Regional Provider Representative Request - Region 4 - Heather Prestridge

Dear Heather,

I have reached out to our Birthing Center Policy staff and also to our enrollment leadership and they both have confirmed that at this time we are unable to enroll DEMs. Senate Bill SB21-101 is

**"Concerning the continuation of the registration of direct-entry midwives, and, in connection therewith, implementing the recommendations contained in the 2020 sunset report by the department of regulatory agencies and making an appropriation."**

CDPHE is scheduled to start a comprehensive review of Chapter 22 and define the scope, rules and regulations for DEMs. Our policy staff will continue to investigate what statutory changes would need to occur for DEMs to be enrolled as Medicaid Providers and what the Senate Bill 21-101 requires from HCPF.

It is not that I personally declined your enrollment application to become a Medicaid Provider, as I am only the messenger.

At this time, it is not possible to enroll you as a provider until CDPHE defines the scope of practice and the rules and regulations that will apply to DEMs.

We appreciate all the information that you have shared with us and we thank you for your patience while we investigate this issue and the multiple questions related to the required statutory changes.

Thank you  
Pita W

Guadalupe "Pita" Cano-Wilson  
Provider Field Representative  
Medicaid Operations Office  
(She, Her, Hers)



P 303-866-5317 | F 303-866-4411 | State Relay: 711 | C XXX-XXX-XXXX

1570 Grant Street, Denver, CO 80203  
Pita.Cano-Wilson@state.co.us | Colorado.gov/hcpf

I am working remotely due to COVID-19. Email is the fastest way to reach me.

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On Thu, Jul 13, 2023 at 3:57 PM Heather Prestridge <heather@seasonsbirthcenter.com> wrote:

Hello Pita - in a meeting with CDPHE today, they informed me that birth centers and HPCF were notified of the statutory event that included direct-entry (CPM) providers as birth center staff. The notification was sent by portal message here



**COLORADO**  
Health Facilities  
Interactive

To: Birth Centers

From: HFEMSD

On May 28, 2021, Governor Polis signed Senate Bill 21-101, Concerning the Continuation of Direct-Entry Midwives, a portion of which impacts licensed Birth Centers subject to 6 CCR 1011-1, Chapter 22. This law expands the settings where a Direct-entry midwife may practice to include birth centers. This law, and this expanded scope, are effective Sept. 1, 2021. This means that regardless of any conflicting regulatory language, direct-entry midwives may practice in licensed Birth Centers. All birth centers will be held to this standard on survey.

The Department recognizes that there are portions of Chapter 22 that will need to be updated to harmonize the regulations with the newly enacted law. However, until such a time as the Department can complete the rulemaking process, State law controls. The Department is tentatively scheduled to begin a comprehensive review of Chapter 22 in October 2023. Before stakeholder meetings begin, we encourage all impacted stakeholders to send us any questions or concerns with the existing regulations. More information on the rulemaking process will be sent closer to that date.

A link to the signed legislation made by found at this link: [https://leg.colorado.gov/sites/default/files/2021a\\_101\\_signed.pdf](https://leg.colorado.gov/sites/default/files/2021a_101_signed.pdf)

And the Department's current Chapter 22 regulations may be found at this link: <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=8506&fileName=6%20CCR%201011-1%20Chapter%2022>

If you have any questions on this message, the new legislation or the rulemaking process, please contact Anne Strawbridge, Policy and Regulation Services Manager at [anne.strawbridge@state.co.us](mailto:anne.strawbridge@state.co.us)

For all other questions related to Birth Centers please contact Erica Brudjar, Acute Care Section Manager at [Erica.brudjar@state.co.us](mailto:Erica.brudjar@state.co.us)

Erica also included a copy of the act for your review. Please see her response attached.

Respectfully, I request that we move forward with my credentialing so that I may serve the Medicaid families who present to care.

Thank you for your consideration.

Heather Prestridge, CPM

**From:** Brudjar - CDPHE, Erica <erica.brudjar@state.co.us>

**Sent:** Thursday, July 13, 2023 3:45 PM

**To:** Heather Prestridge <heather@seasonsbirthcenter.com>; Jo Tansey - CDPHE <jo.tansey@state.co.us>; Alexandra Haas - CDPHE <alexandra.haas@state.co.us>

**Cc:** Indra Lusero <indra@elephantcircle.org>

**Subject:** Re: Fw: Submission - Regional Provider Representative Request - Region 4 - Heather Prestridge

Heather,

I've reached out to our leadership on this issue. I wanted to provide you a few things that you may be able to send to HCPHF.

Here is the link to the portal message sent out in 2021: <http://healthfacilitiescommunity.blogspot.com/search/label/Birth%20Cntr>

Also, I've done a snippet here:

healthfacilitiescommunity.blogspot.com/search/label/Birth%20Cntr

Monday, November 8, 2021

### Statutory updates relevant to Birth Centers and regulatory update timeline

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Health Facilities  
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If you have any questions on this message, the new legislation or the

Furthermore, I've attached the signed statute that does override the Chapter 22 rule.

If you have any questions, please let me know.

Thanks,

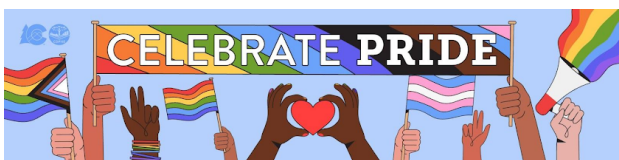
Erica Brudjar, RN, BSN, HACCP-CMS  
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On Thu, Jul 13, 2023 at 3:11 PM Heather Prestridge <heather@seasonsbirthcenter.com> wrote:

Hello Erica - thank you for talking with us today. Attached you will find my email exchange with our Region 4 representative who declined my application to become a Medicaid provider based on the Regulations. She has not responded to my requests for further information since this email on 6/8. Please let me know if I can provide any further information to move this case forward.

Thanks,  
Heather

**Heather Prestridge, CPM**

(She, her, hers) [Why pronouns matter](#)

Administrative Director

Seasons Community Birth  
Center

Seasons For All Health Care



2900 E 136<sup>th</sup> Ave • Thornton, CO 80241

☎ 303-999-3950

✉ [heather@seasonsbirthcenter.com](mailto:heather@seasonsbirthcenter.com)

🌐 [www.seasonsbirthcenter.com](http://www.seasonsbirthcenter.com)



[Support Colorado Nonprofit Birth Centers](#)

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**From:** Cano-Wilson - HCPF, Pita <[pita.cano-wilson@state.co.us](mailto:pita.cano-wilson@state.co.us)>

**Sent:** Thursday, June 8, 2023 3:52 PM

**To:** Heather Prestridge <[heather@seasonsbirthcenter.com](mailto:heather@seasonsbirthcenter.com)>

**Subject:** Re: Submission - Regional Provider Representative Request - Region 4 - Heather Prestridge

Dear Heather,

Unfortunately, until the Colorado Code of Regulations is changed and in accordance with Federal regulations, we cannot change our enrollment requirements. I wish I had better news.

Thank you  
Pita W

Guadalupe "Pita" Cano-Wilson

Provider Field Representative

Medicaid Operations Office

(She, Her, Hers)



**COLORADO**

Department of Health Care  
Policy & Financing

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[Pita.Cano-Wilson@state.co.us](mailto:Pita.Cano-Wilson@state.co.us) | [Colorado.gov/hcpf](http://Colorado.gov/hcpf)

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On Thu, Jun 1, 2023 at 3:35 PM Heather Prestridge <[heather@seasonsbirthcenter.com](mailto:heather@seasonsbirthcenter.com)> wrote:

Hello Pita - I was reminded that CDPHE who regulates birth centers confirms that the statute trumps the regulations as stated in this part of the regulations:

Chapter 2, 2.1.2 A facility or agency licensed by the Department shall comply with all applicable federal and state statutes and regulations including this Chapter 2.

The statute for Certified Professional Midwives allows us to practice in the home setting and in birth centers as of 9/2021.

Please feel free to reach out to me if you need any further information regarding these rules/statutes.

*Heather Prestridge, CPM*

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**From:** Heather Prestridge <[heather@seasonsbirthcenter.com](mailto:heather@seasonsbirthcenter.com)>

**Sent:** Thursday, June 1, 2023 2:13 PM

**To:** Cano-Wilson - HCPF, Pita <[pita.cano-wilson@state.co.us](mailto:pita.cano-wilson@state.co.us)>

**Cc:** Indra Lusero <[indra@elephantcircle.org](mailto:indra@elephantcircle.org)>

**Subject:** Re: Submission - Regional Provider Representative Request - Region 4 - Heather Prestridge

Hello Pita - thank you so much for your quick response to my query.

The regulations for birth centers have been updated to allow Certified Professional Midwives as staff as of September 2021. The center I work for does staff Certified Nurse Midwives as well, who are enrolled Medicaid providers. I am DORA certified as a Certified Professional Midwife and have attached my license

for reference. But because my provider type is not listed in the enrollment portal, I can't get credentialled. I'm excited to serve Medicaid families in accordance with my license and scope of practice. Who can help me get enrolled? Thank you again for your assistance.

Heather Prestridge, CPM

**From:** Cano-Wilson - HCPF, Pita <[pita.cano-wilson@state.co.us](mailto:pita.cano-wilson@state.co.us)>  
**Sent:** Thursday, June 1, 2023 1:44 PM  
**To:** Heather Prestridge <[heather@seasonsbirthcenter.com](mailto:heather@seasonsbirthcenter.com)>  
**Subject:** Re: Submission - Regional Provider Representative Request - Region 4 - Heather Prestridge

Dear Heather,  
Thank you for your recent inquiry. The reason why there is no provider type for **Certified Professional Midwife** is because the Colorado Code of Regulations does not allow it as shown below:

**STANDARDS FOR HOSPITALS AND HEALTH FACILITIES: CHAPTER 22 – BIRTH CENTERS 6 CCR 1011-1 Chapter 22  
SECTION 6 – CLINICAL STAFF  
6.1 The facility shall have an organized clinical staff restricted to the following practitioners:  
physicians and certified nurse midwives.**

For that reason, our requirements for Birthing Center PT 58/116 include the following:

- 1) Credentialed professionals (rendering providers) must be enrolled individually (separate application) and affiliated with the group. **Rendering providers must be Certified Nurse Midwives or Physicians.**
- 2) No Direct Entry Midwives (non-DORA certified) are to be enrolled.
- 3) Copy of the individual license for the Certified Nurse Midwife (CNM) or Physician who will affiliate to the Birthing Center

The enrollment for Seasons Community Birthing Center did not show the name and the license of a Certified Nurse Midwife or a Physician that will affiliate to the facility as required. Do you have the information available?

Please let me know if you have any questions.

Thank you  
Pita W

Guadalupe “Pita” Cano-Wilson  
Provider Field Representative  
Medicaid Operations Office  
(She, Her, Hers)



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On Wed, May 31, 2023 at 3:26 PM Heather Prestridge <[no-reply@hcpf-co.colorado.gov](mailto:no-reply@hcpf-co.colorado.gov)> wrote:

Submitted on Wednesday, May 31, 2023

Submitted by: Anonymous

Submitted values are:

**Your Name**  
Heather Prestridge

**Phone Number**  
303-999-3950

**Email**  
[heather@seasonsbirthcenter.com](mailto:heather@seasonsbirthcenter.com)

**Organization**  
Seasons For All Health Care

**National Provider Identifier (NPI)**  
1689377251

**Please explain any issues being experienced and how we can help you**  
Hello Pita -

Seasons For All Health Care (group) and Seasons Community Birth Center (facility) is dedicated to providing care to families on Medicaid. As I am joining the practice as a provider, I am having trouble enrolling to Medicaid. I don't find my provider type, Certified Professional Midwife, and can't get help from the provider enrollment line (they suggested I enroll as a Nurse Midwife because it's the closest provider type, but I am not a CNM).

The birth center regulations now allow Certified Professional Midwives to practice in birth centers. I have a Colorado license from DORA, a national board certification from NARM, I graduated from a MEAC school, have an NPI number and have malpractice insurance. But because my provider type CPM is not listed on the enrollment portal, I can't join my group that way. Is there another way I can enroll as a Medicaid provider with my group?

Thank you for taking the time to provide me with some guidance.

Sincerely,

Heather Prestridge, CPM