



Gavin Newsom, Governor  
State of California  
Health and Human Services Agency  
**DEPARTMENT OF MANAGED HEALTH CARE**  
980 9<sup>th</sup> Street, Suite 500  
Sacramento, CA 95814  
Phone: 916-324-8176 | Fax: 916-255-5241  
[www.DMHC.ca.gov](http://www.DMHC.ca.gov)

## ALL PLAN LETTER

**DATE:** March 20, 2026

**TO:** All Health Care Service Plans

**FROM:** Nathan Nau  
Deputy Director, Office of Plan Monitoring

**SUBJECT:** APL 26-005 – Compliance with Assembly Bill 904, Maternal and Infant Health Equity Program

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The Department of Managed Health Care (DMHC) issues this All-Plan Letter (APL) to inform health care service plans (plans) covering maternity services of the filing requirements necessary to demonstrate compliance with and implementation of Assembly Bill (AB) 904. The plan filings required by this APL will assist the DMHC in preparing a statutorily required report for the Legislature by January 1, 2027, that describes “the doula coverage and programs established” pursuant to the bill.<sup>1</sup>

### I. Background and Requirements

AB 904 (Calderon, Chapter 349, Statutes of 2023), added section 1367.626 to the California Health and Safety Code,<sup>2</sup> effective January 1, 2024. AB 904 required plans, on or before January 1, 2025, to develop a maternal and infant health equity program that addresses racial health disparities in maternal and infant health outcomes through the use of doulas. Medi-Cal managed care plans are considered compliant with AB 904 so long as doula services remain a Medi-Cal covered benefit.<sup>3</sup>

Commercial plans must develop maternal and infant health equity programs through the use of doulas. While AB 904 is not prescriptive in how commercial plans achieve this, it does permit plans to integrate the new programs into existing maternal mental health

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<sup>1</sup> Section 1367.626(b).

<sup>2</sup> References herein to “section” are to sections of the California Health and Safety Code, unless otherwise indicated.

<sup>3</sup> Section 1367.626(a)(2). At the time of this APL, doula services are included in the list of preventive services covered by Medi-Cal, pursuant to State Plan Amendment 22-0002, effective January 1, 2023. See [Department of Health Care Services Doula Benefit Implementation Report](#) (July 2025) at 5.

programs,<sup>4</sup> including those maternal mental health programs “encouraging the coverage of doula care.”<sup>5</sup> AB 904 also permits commercial plans to develop the new maternal and infant health equity programs by expanding their existing doula programs, if any.<sup>6</sup> Given that the goal of AB 904 was to expand doula access,<sup>7</sup> the DMHC will deem compliant commercial plans that elect to cover doula services. Commercial plans that do not elect to offer doula services as a covered benefit must still develop maternal and infant health equity programs through the use of doulas.

## II. AB 904 Compliance Filing

Within ninety (90) calendar days of the issue date of this APL, plans must submit a filing, via the DMHC’s e-Filing Web Portal, titled “**AB 904 Compliance Filing**.” The filing must be submitted as an “**Amendment filed by a licensee pursuant to section 1352(a)**” and must consist of the following:

### A. Summary of e-Filing Information

Each e-Filing must include an Exhibit E-1, Summary of e-Filing Information, providing a summary description of the filing. Within the Exhibit E-1, include the following:

1. The purpose of the filing.

Example: “The purpose of this filing is to demonstrate plan compliance with AB 904.”

2. A list of all documents demonstrating compliance with AB 904. For all previously filed documents (e.g., existing contracts, policies, and procedures) identify the document type and the filing number in which the document was most recently approved. For all new or amended documents submitted with the filing as supporting documentation pursuant to Section II.C below, list the documents by file name and identify the corresponding Exhibit or Filing Document Type (e.g., Exhibit I-9, Notices to Enrollees). Identify page number(s) for the relevant portions of supporting documents.

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<sup>4</sup> DMHC-licensed plans are required to have maternal mental health programs pursuant to section 1367.625.

<sup>5</sup> Section 1367.626(a)(1).

<sup>6</sup> Section 1367.626(a)(1). AB 904 and its legislative history note that although doula services are still not covered by private health plans, some California commercial plans have launched doula care pilot programs. See AB 904 section 1(m); Assem. Health, Floor Analysis of AB 904 (2023-2024 Reg. Sess.), Sept. 7, 2023.

<sup>7</sup> See AB 904 section 1(n) (“While California is one of 10 states with Medicaid doula benefits, this bill would position the state to be one of the first to also expand doula access in the private coverage context. With 40 percent of births being funded by Medi-Cal every year, this act has the potential to reach even more births with the support of doulas.”)

3. Any other information the plan believes would demonstrate compliance with AB 904 and assist the DMHC with its review of this filing.

### **B. AB 904 Implementation Form**

Each AB 904 Compliance Filing must include a completed AB 904 Implementation Form submitted as an Exhibit E-10, Health Equity and Quality – Miscellaneous. The AB 904 Implementation Form, which collects information on how plans have implemented AB 904, is available on the “Downloads” page of the e-Filing Web Portal under the “Compliance” section and “AB 904 – Maternal and Infant Health Equity Program” subsection. Plans must download, complete, and save the form before submitting it to the DMHC.

### **C. Supporting Documentation**

If the plan is proposing new or amended contracts, policies, or procedures to demonstrate compliance with AB 904, the plan should file each document under the appropriate Exhibit or Filing Document Type, with all changes from previously approved documents highlighted in redline form.

If the plan delegated compliance with AB 904 to a contracted provider, plan, or other entity, submit all new or amended contract(s) under the appropriate Exhibit or Filing Document Type.

Changes to a plan’s Exhibit J-14 should not be submitted as part of the AB 904 Compliance Filing. Plans should instead submit such changes as part of their annual Provider Directory Compliance Filing and list the corresponding DMHC filing number on the Exhibit E-1 associated with the AB 904 Compliance Filing.

If you have any questions about this APL, please contact the DMHC Health Equity and Quality Team at [HEQ@dmhc.ca.gov](mailto:HEQ@dmhc.ca.gov).