

BWS Doula Agency Position on Ohio House Bill 142 (Ohio Doula Law)

The BWS Doula Agency stands in opposition to the Ohio Doula Law (House Bill 142), which aims to provide Medicaid-reimbursed doula services. While the intention is to improve maternal and infant health, this law fails to align with the values and mission of our agency, particularly in the following key areas:

1. **Oversight by the Ohio Board of Nursing:** Placing doulas under the jurisdiction of the Ohio Board of Nursing undermines the non-clinical and community-centered nature of doula care. When asked to comment on these issues with HB 142, Maureen Corcoran, Director of Ohio Department of Medicaid stated “you have to set up this kind of regulatory oversight mechanism to work with one of the boards that has a nearby kind of clinical experience... you don’t want the doulas under the plumbers and pipefitter board, for example, right?” The issue with this is that doulas are, by definition, *non-clinical*.

Doulas provide emotional and physical support, often coming from the same marginalized communities they serve. Oversight by a clinical board risks medicalizing this care and creating barriers for entry, especially for Black doulas. Given Ohio's abysmal infant and maternal health outcomes and racial disparities, particularly among Black women and infants, it's critical to support the unique, culturally competent care that doulas offer. Ohio families deserve a more creative approach—one that establishes a regulatory framework reflecting the community-based and culturally responsive care doulas provide.

2. **Lack of Clear Guidelines and Penalties:** The legislation contains vague language regarding penalties for doulas, creating an environment of uncertainty. The law permits anyone to report a doula for any reason, with doulas potentially facing undefined financial penalties or punitive actions. This ambiguity could harm ethical practice and disproportionately affect Black doulas and communities,
3. **Historical Racism in Birth Work Regulation:** The law reflects a continuation of historical discrimination against Black birth workers, rooted in the marginalization of Black midwives. The requirement for doulas to undergo physical and psychological testing at their own expense, if reported, mirrors past efforts to undermine Black birth attendants.
4. **Restricting "Certified" Status:** By restricting the use of the term "certified" to those approved by the State of Ohio, the law devalues doulas with national or international certifications. This limits their credibility and ability to practice, further narrowing access to quality care.

In conclusion, BWS Doula Agency supports increasing access to doula care through low-cost, sliding scale, and grant-assisted models, but opposes the Ohio Doula Law for its punitive measures, lack of transparency, and failure to protect the non-clinical, community-based nature of doula work.

Sincerely,
Dr. Jodi Cunningham and April Kline
Co-Founders, BWS Doula Agency

