

March 19, 2020

The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Administrator Verma:

The undersigned organizations, dedicated to improving maternal and child health, urge you to invoke the flexibilities granted to the Centers for Medicare & Medicaid Services (CMS) through the national emergency declaration and the Stafford Act to expeditiously approve pending Section 1115 Waivers from Illinois and Missouri and work with additional states to ensure that postpartum women who rely on the Medicaid program receive continuous coverage for one year after delivery. As our Nation faces COVID-19, a global pandemic and serious public health threat, it also grapples with a maternal mortality crisis. With additional stresses on the health care system presented by the COVID-19 pandemic, the crisis could worsen during this time. Your swift approval of these 1115 Waivers will ensure that as we face this national emergency, postpartum women have the health care coverage they need during this critical time.

The United States is the only developed country with a rising maternal death rate.<sup>i</sup> Cardiac disease—the leading cause of maternal mortality in the U.S. according to the Centers for Disease Control and Prevention (CDC)—is particularly linked to maternal deaths in the late postpartum period up to one year after the end of pregnancy.<sup>ii</sup> The CDC warns that people with chronic medical conditions, such as heart disease, are at elevated risk of becoming very ill from COVID-19.<sup>iii</sup> CMS should prioritize this at-risk population and take action to increase coverage for postpartum women by supporting state efforts to extend continuous Medicaid coverage for one year postpartum.

The Illinois and Missouri 1115 Waivers demonstrate innovative solutions to addressing the maternal mortality crisis, which can also help mitigate the impacts of COVID-19 on postpartum women – particularly those with chronic health conditions – and their babies. One in three women experience a disruption in insurance coverage before, during, or after pregnancy, and nearly 60 percent of these perinatal insurance disruptions include a period of uninsurance.<sup>iv</sup> The postpartum period is a time of vulnerability during which many women have unmet health needs.<sup>v,vi</sup>

The evidence is clear that disruptions in insurance coverage during the postpartum period are contributing to poor maternal health and mental health outcomes and deaths, which may worsen as we face this global pandemic. We strongly urge you to expeditiously approve Illinois and Missouri's pending 1115 Waivers and work with additional states to ensure that postpartum women who rely on the Medicaid program have access to care amid this national emergency.

Sincerely,

American College of Obstetricians and Gynecologists  
AIDS Alliance for Women, Infants, Children, Youth & Families  
American College of Physicians  
American Osteopathic Association  
American Psychiatric Association  
APS Foundation of America, Inc.  
Association of Women's Health, Obstetric and Neonatal Nurses  
Catholic Health Association of the United States

Center for Law and Social Policy (CLASP)  
Center for Reproductive Rights  
Every Mother Counts  
Families USA  
March for Moms  
March of Dimes  
MomsRising  
NARAL Pro-Choice America  
National Association of Pediatric Nurse Practitioners  
National Black Women's HIV/AIDS Network  
National Family Planning & Reproductive Health Association  
National WIC Association  
Nurse-Family Partnership  
Society for Maternal-Fetal Medicine

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<sup>i</sup> Recent Increases in the U.S. Maternal Mortality Rate: Disentangling Trends From Measurement Issues. MacDorman MF, Declercq E, Cabral H, Morton C. *Obstet Gynecol.* 2016;128(3):447-55.

<sup>ii</sup> Pregnancy and heart disease. ACOG Practice Bulletin No. 212. American College of Obstetricians and Gynecologists. *Obstet Gynecol* 2019;133:e320–56.

<sup>iii</sup> Coronavirus Disease 2019 (COVID-19). Available at: <https://www.cdc.gov/coronavirus/2019-ncov/high-risk/high-risk-complications.html>

<sup>iv</sup> High Rates Of Perinatal Insurance Churn Persist After The ACA. Health Affairs Blog. September 16, 2019. DOI: 10.1377/hblog20190913.387157.

<sup>v</sup> The Fourth Trimester of Pregnancy: Committing to Maternal Health and Well-Being Postpartum. Spelke B and Werner E. *R I Med J* (2013). 2018 Oct 1;101(8):30-33.

<sup>vi</sup> The fourth trimester: a critical transition period with unmet maternal health needs. Tully KP, Stuebe AM, and Verbiest SB. *Am J Obstet Gynecol.* 2017 Jul;217(1):37-41.