February 5, 2021

Norris Cochran
Acting Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Liz Richter
Acting Administrator
Centers for Medicare and Medicaid Services
Box 8016, Baltimore, MD 21244-8016

Dear Acting Secretary Cochran and Acting Administrator Richter:

The undersigned 113 national organizations and 151 state and local organizations dedicated to improving maternal health write today to urge the Centers for Medicare and Medicaid Services (CMS) to act as soon as possible to approve pending section 1115 demonstration projects aimed at extending the postpartum coverage period for individuals who were enrolled in Medicaid while pregnant to a full year after the end of pregnancy.¹ The Biden Administration has a unique opportunity to elevate maternal health among its Medicaid priorities by acting swiftly to approve these state requests. As you review these waiver proposals, we encourage you to take all possible steps to work with states to extend comprehensive coverage to a full year after the end of pregnancy regardless of health condition.

The United States is the only industrialized nation where maternal deaths are on the rise. According to the Centers for Disease Control and Prevention (CDC), approximately 700 pregnancy-related deaths occur in the U.S. each year and 60 percent of these deaths are preventable.¹² There are stark racial inequities in maternal mortality. Black women are three times more likely to die from a pregnancy-related complication than non-Hispanic White women; Indigenous women are more than twice as likely to die from a pregnancy-related complication than non-Hispanic White women.³ The COVID-19 pandemic risks exacerbating the maternal health crisis. A recent study from the CDC suggests that pregnant women are at a significantly higher risk for severe outcomes, including death, from COVID-19 than non-pregnant women.⁴

Continuous access to Medicaid is crucial to addressing our nation’s rising rate of maternal mortality. Medicaid paid for 43 percent of U.S. births in 2018, including 50 percent of births in rural areas, 60 percent of births to Latina women, and 66 percent of births to Black women.⁵ Under current law, women who are eligible for Medicaid based on the fact that they are pregnant become ineligible for coverage 60 days after the end of pregnancy.⁶ While some women are able to successfully transition to other sources of coverage at this time, many are left in the untenable position of being uninsured shortly after a major medical event.⁷,⁸ Insurance coverage disruptions are one of many factors that contribute to high rates of maternal mortality among the Medicaid-eligible population.⁹ Importantly,

¹ This letter uses the terms “women” and “mothers” to describe people who are pregnant or recently experienced pregnancy. We use these terms to align with the language in the Social Security Act, which defines Medicaid eligibility for pregnant and postpartum women. We acknowledge that not all people who experience pregnancy identify as women and urge policymakers to ensure that this policy applies to all birthing persons covered by Medicaid.
half of all uninsured new mothers report losing Medicaid after pregnancy as the reason they became uninsured.10 These coverage disruptions also disproportionately affect women of color; nearly half of all non-Hispanic Black women had discontinuous insurance from pre-pregnancy to postpartum and half of Hispanic Spanish-speaking women became uninsured in the postpartum period.11

There are major risks to becoming uninsured shortly after experiencing pregnancy. For example, one in seven women experience symptoms of postpartum depression in the year after giving birth, and evidence suggests women with substance use disorder are more likely to experience relapse and overdose seven to 12 months postpartum.12,13 Additionally, 18 percent of women who lost Medicaid coverage and became uninsured in the postpartum period reported either gestational diabetes or pregnancy-related hypertension – both conditions that would benefit from ongoing monitoring and treatment after the end of pregnancy.14 Moreover, about one-third of the women who lost coverage were recovering from a cesarean section and just over one-quarter reported being depressed sometimes, often, or always in the months after giving birth.15 Many of these postpartum health risks could be mitigated if women were able to maintain coverage through the Medicaid program.

Our organizations appreciate President Biden’s stated commitments to improving maternal health and ending preventable maternal death in the United States. We urge CMS to act swiftly on these commitments by approving pending section 1115 demonstration projects to extend Medicaid coverage for pregnant individuals beyond 60 days postpartum. Should you have any questions, please contact Emily Eckert, Policy Manager with the American College of Obstetricians and Gynecologists, at eeckert@acog.org.

Sincerely,

National Organizations
1,000 Days
2020 Mom
Academic Pediatric Association
Academy of Nutrition and Dietetics
AFE Foundation
Alliance for Black NICU Families
American Academy of Family Physicians
American Academy of Pediatrics
American College of Nurse-Midwives
American College of Obstetricians and Gynecologists (ACOG)
American College of Osteopathic Obstetricians and Gynecologists
American College of Physicians
American Federation of State, County and Municipal Employees
American Heart Association
American Lung Association
American Medical Association
American Nurses Association
American Osteopathic Association
American Pediatric Society
American Psychiatric Association
America’s Essential Hospitals
America’s Health Insurance Plans
Anthem, Inc.
APS Foundation of America, Inc
Association for Community Affiliated Plans
Association of American Medical Colleges
Association of Maternal & Child Health Programs
Association of Medical School Pediatric Department Chairs
Association of Public Health Laboratories
Association of State and Territorial Health Officials
Association of University Centers on Disabilities
Association of Women’s Health, Obstetric and Neonatal Nurses
Babyscripts
Black Mamas Matter Alliance
Blue Cross Blue Shield Association
Centene Corporation
Center for Community Resilience
Center for Law and Social Policy (CLASP)
Centering Healthcare Institute
Children's Hospital Association
CityMatCH
Commissioned Officers Association of the U.S. Public Health Service, Inc. (COA)
Community Catalyst
Council of State and Territorial Epidemiologists
Every Mother Counts
Families USA
First Focus on Children
Futures Without Violence
GLO Preemies
Guttmacher Institute
Hand to Hold
Health Care Service Corporation
HealthConnect One
HealthyWomen
Hemophilia Federation of America
HOPE Registry
Institute for Perinatal Quality Improvement
The Jewish Federations of North America
Johnson & Johnson
Lamaze International
League of Women Voters of the United States
March for Moms
March of Dimes
Maternal Mental Health Leadership Alliance
Medicaid Health Plans of America
Mental Health America
Molina Healthcare
Mom Congress
State and Local Organizations

Alabama
Alabama Arise
Community Enabler Developer, Inc.

Alaska
American College of Obstetricians and Gynecologists, Alaska Section
Postpartum Support International Alaska Chapter

Arizona
American College of Obstetricians and Gynecologists, Arizona Section

Arkansas
Apple Seeds, Inc.

California
American Academy of Pediatrics, CA Chapter 1
American Academy of Pediatrics, CA Chapter 3
American Academy of Pediatrics, Orange County Chapter
American College of Obstetricians and Gynecologists, California Section
California Maternal Quality Care Collaborative
Center for Health Equity, University of California, San Francisco
Maternal Mental Health NOW
Sacramento Maternal Mental Health Collaborative
Supporting Mamas
The Children's Partnership
The Tatia Oden French Memorial Foundation
The Woman's Well

Colorado
American Academy of Pediatrics, Colorado Chapter
American College of Obstetricians and Gynecologists, Colorado Section

Connecticut
NARAL Pro-Choice Connecticut

Delaware
American College of Obstetricians and Gynecologists, Delaware Section

District of Columbia
American College of Obstetricians and Gynecologists, DC Section
DC Chapter of the American Academy of Pediatrics

Florida
American College of Obstetricians and Gynecologists, Florida Section
Georgia
American College of Obstetricians and Gynecologists, Georgia Section
GEEARS: Georgia Early Education Alliance for Ready Students
Georgia Chapter-American Academy of Pediatrics
Healthy Mothers, Healthy Babies Coalition of Georgia

Hawaii
American College of Obstetricians and Gynecologists, Hawaii, Guam, American Samoa Section

Idaho
American College of Obstetricians and Gynecologists, Idaho Section

Illinois
AIDS Foundation Chicago
American College of Obstetricians and Gynecologists, Illinois Section
Champaign County Health Care Consumers
Children's Home & Aid
Cook County Health
DuPage Federation on Human Services Reform
Erie Family Health Centers
EverThrive Illinois
Family-to-Family Health Information Center of The Arc of Illinois
Hope Clinic for Women
Illinois Academy of Family Physicians
Illinois Action for Children
Illinois Association of Rehabilitation Facilities
Illinois Caucus for Adolescent Health
Illinois Chapter, American Academy of Pediatrics
Illinois Coalition Against Domestic Violence
Illinois Coalition for Immigrant and Refugee Rights
Illinois Contraceptive Access Now
Illinois Health and Hospital Association
Illinois National Organization for Women
Illinois Perinatal Quality Collaborative
Illinois Primary Health Care Association
Illinois Public Health Association
Illinois Public Health Institute
Jewish Federation of Chicago
Legal Council for Health Justice
McHenry County Citizens for Choice
Peoria County Bright Futures
Postpartum Support International- IL Chapter, Central IL Region
Protect Our Care Illinois
Saint Anthony Hospital
Shriver Center on Poverty Law
Stephenson County Health Department
Illinois National Organization for Women
Indiana
American College of Obstetricians and Gynecologists, Indiana Section

Iowa
American College of Obstetricians and Gynecologists, Iowa Section

Kansas
American College of Obstetricians and Gynecologists, Kansas Section
Kansas Action for Children

Kentucky
American College of Obstetricians and Gynecologists, Kentucky Section

Louisiana
American College of Obstetricians and Gynecologists, Louisiana Section

Maine
American College of Obstetricians and Gynecologists, Maine Section

Maryland
American College of Obstetricians and Gynecologists, Maryland Section
Johns Hopkins Women's Mood Disorders Center
NARAL Pro-Choice Maryland

Massachusetts
American College of Obstetricians and Gynecologists, Massachusetts Section
Lifeline4Moms, University of Massachusetts Medical School
NARAL Pro-Choice Massachusetts

Michigan
American College of Obstetricians and Gynecologists, Michigan Section
Michigan Council for Maternal and Child Health
Michigan League for Public Policy

Minnesota
American College of Obstetricians and Gynecologists, Minnesota Section
Minnesota Chapter of the American Academy of Pediatrics

Mississippi
American College of Obstetricians and Gynecologists, Mississippi Section
Mississippi Chapter, American Academy of Pediatrics

Missouri
American College of Obstetricians and Gynecologists, Missouri Section
Kids Win Missouri
Missouri Family Health Council, Inc.
Missouri Nurses Association
NARAL Pro-Choice Missouri  
National Council of Jewish Women St. Louis  

**Nebraska**  
Nebraska Perinatal Quality Improvement Collaborative  

**Nevada**  
American College of Obstetricians and Gynecologists, Nevada Section  
Nevada Chapter, American Academy of Pediatrics  

**New Jersey**  
American College of Obstetricians and Gynecologists, New Jersey Section  

**New Mexico**  
American College of Obstetricians and Gynecologists, New Mexico Section  

**New York**  
American Academy of Pediatrics, NY Chapter 2  
American College of Obstetricians and Gynecologists, District II (New York)  
NYS AAP - Chapter 3  

**North Carolina**  
Action NC RAGE  
American College of Obstetricians and Gynecologists, North Carolina Section  
Community Care of North Carolina, Pregnancy Medical Home Program  
Maternal Health Equity Collaborative  
NARAL Pro-Choice North Carolina  
NC Child  
North Carolina Obstetrical and Gynecological Society  

**North Dakota**  
American College of Obstetricians and Gynecologists, North Dakota Section  

**Ohio**  
American College of Obstetricians and Gynecologists, Ohio Section  
Ohio Chapter, American Academy of Pediatrics  

**Oklahoma**  
American College of Obstetricians and Gynecologists, Oklahoma Section  

**Oregon**  
American College of Obstetricians and Gynecologists, Oregon Section  
Ingram Screening, LLC  
NARAL Pro-Choice Oregon  

**Pennsylvania**  
American College of Obstetricians and Gynecologists, Pennsylvania Section
Maternity Care Coalition
PA Chapter, American Academy of Pediatrics
PA Coalition for Oral Health
Pennsylvania Partnerships for Children

Rhode Island
American College of Obstetricians and Gynecologists, Rhode Island Section

South Carolina
American College of Obstetricians and Gynecologists, South Carolina Section

South Dakota
American College of Obstetricians and Gynecologists, South Dakota Section

Tennessee
American College of Obstetricians and Gynecologists, Tennessee Section

Texas
American College of Obstetricians and Gynecologists, District XI (Texas)
Circle Up, United Methodist Women
El Centro de Corazón
Every Body Texas
Healthy Futures of Texas
Pasadena Health Center
Postpartum Support International Texas Chapter
Pregnancy and Postpartum Health Alliance of Texas
Texans Care for Children
Texas Academy of Family Physicians
Texas Association of Community Health Plans
Texas Campaign to Prevent Teen Pregnancy
Teaching Hospitals of Texas
Texas Council on Family Violence
Texas Health Institute
Texas Oral Health Coalition Inc
Texas Pediatric Society
Texas Women's Foundation
Texas Women's Healthcare Coalition
TexProtects

Utah
American Academy of Pediatrics, Utah Chapter
American College of Obstetricians and Gynecologists, Utah Section
Utah Health Policy Project

Vermont
American College of Obstetricians and Gynecologists, Vermont Section
Virginia
American College of Obstetricians and Gynecologists, Virginia Section
Jennifer Bush-Lawson Foundation
The Commonwealth Institute for Fiscal Analysis

Washington
American College of Obstetricians and Gynecologists, Washington Section
NARAL Pro-Choice Washington
WCAAP

West Virginia
American College of Obstetricians and Gynecologists, West Virginia Section

Wisconsin
American College of Obstetricians and Gynecologists, Wisconsin Section

6 Sec. 1902(e)(5)

Ibid.