

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.^{1,2} 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 Premies
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

MomsRising
NAPHSIS
NASTAD
National Alliance on Mental Illness
National Association for Children's Behavioral Health
National Association of Community Health Centers
National Association of County and City Health Officials
National Association of Nurse Practitioners in Women's Health
National Association of Pediatric Nurse Practitioners
National Birth Equity Collaborative
National Family Planning & Reproductive Health Association
National Health Care for the Homeless Council
National Healthy Start Association
National Institute for Children's Health Quality - NICHQ
National League for Nursing
National Partnership for Women & Families
National WIC Association
National Women's Health Network
Nurse-Family Partnership
Organization of Teratology Information Specialists
Parents as Teachers
Pediatric Policy Council
Planned Parenthood Federation of America
Postpartum Pelvic Health Advocates
Postpartum Support International
Power to Decide
Preeclampsia Foundation
PremieWorld, LLC
Primary Maternity Care
Raising Women's Voices for the Health Care We Need
Redstone Global Center for Prevention and Wellness
Reproaction
Restoring Our Own Through Transformation (ROOTT)
Society for Maternal-Fetal Medicine
Society for Pediatric Research
Society for Reproductive Investigation
Society for Women's Health Research
Start Early
The 2 Degrees Foundation
The HOPE Registry
The Joint Commission
The National Alliance to Advance Adolescent Health
The PPROM Foundation
United States Breastfeeding Committee (USBC)
ZERO TO THREE

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

¹ Petersen EE, Davis NL, Goodman D, et al. Vital Signs: Pregnancy-Related Deaths, United States, 2011–2015, and Strategies for Prevention, 13 States, 2013–2017. *MMWR Morb Mortal Wkly Rep* 2019;68:423–429.

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³ Petersen EE, Davis NL, Goodman D, et al. Racial/Ethnic Disparities in Pregnancy-Related Deaths — United States, 2007–2016. *MMWR Morb Mortal Wkly Rep* 2019;68:762–765. DOI: <http://dx.doi.org/10.15585/mmwr.mm6835a3>

⁴ Zambrano LD, Ellington S, Strid P, et al. Update: Characteristics of Symptomatic Women of Reproductive Age with Laboratory-Confirmed SARS-CoV-2 Infection by Pregnancy Status — United States, January 22–October 3, 2020. *MMWR Morb Mortal Wkly Rep* 2020;69:1641–1647. DOI: <http://dx.doi.org/10.15585/mmwr.mm6944e3>

⁵ Medicaid and CHIP Payment and Access Commission. Medicaid's Role in Financing Maternity Care. January 2020. Retrieved from: <https://www.macpac.gov/wp-content/uploads/2020/01/Medicaid%E2%80%99s-Role-in-Financing-Maternity-Care.pdf>

⁶ Sec. 1902(e)(5)

⁷ Daw JR, Kozhimannil KB, Admon LK. High Rates of Perinatal Insurance Churn Persist After the ACA. *Health Affairs Blog*. September 16, 2019. Available at: <https://www.healthaffairs.org/do/10.1377/hblog20190913.387157/full/>

⁸ McMorrow S, Kenney G. Despite Progress Under the ACA, Many New Mothers Lack Insurance Coverage. *Health Affairs Blog*. September 19, 2018. Available at: <https://www.healthaffairs.org/do/10.1377/hblog20180917.317923/full/>

⁹ Building U.S. Capacity to Review and Prevent Maternal Deaths. (2018). Report from nine maternal mortality review committees. Available at: <https://www.cdcfoundation.org/sites/default/files/files/ReportfromNineMMRCs.pdf>

¹⁰ Urban Institute. Uninsured New Mothers' Health and Health Care Challenges Highlight the Benefits of Increasing Postpartum Medicaid Coverage. May 28, 2020. Available at: <https://www.urban.org/research/publication/uninsured-new-mothers-health-and-health-care-challenges-highlight-benefits-increasing-postpartum-medicaid-coverage>

¹¹ Daw JR, Kolenic GE, Dalton VK, Zivin K, Winkelman T, Kozhimannil KB, Admon LK. Racial and Ethnic Disparities in Perinatal Insurance Coverage. *Obstet Gynecol* 2020;135(4):917-924.

¹² Wisner KL, Sit DKY, McShea MC. Onset Timing, Thoughts of Self-harm, and Diagnoses in Postpartum Women with Screen-Positive Depression Findings. *JAMA Psychiatry* 2013;70(5):490-498.

¹³ Schiff DM, Nielsen T, Terplan M, et al. Fatal and Nonfatal Overdose Among Pregnant and Postpartum Women in Massachusetts. *Obstet Gynecol* 2018;132(2):466-474

¹⁴ Urban Institute. Uninsured New Mothers' Health and Health Care Challenges Highlight the Benefits of Increasing Postpartum Medicaid Coverage. May 28, 2020. Available at:

<https://www.urban.org/research/publication/uninsured-new-mothers-health-and-health-care-challenges-highlight-benefits-increasing-postpartum-medicaid-coverage>

¹⁵ Ibid.