

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.<sup>1</sup> 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.<sup>1,2</sup> 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.<sup>3</sup> 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.<sup>4</sup>

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.<sup>5</sup> 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.<sup>6</sup> 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.<sup>7,8</sup> Insurance coverage disruptions are one of many factors that contribute to high rates of maternal mortality among the Medicaid-eligible population.<sup>9</sup> Importantly,

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<sup>1</sup> 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.<sup>10</sup> 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.<sup>11</sup>

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.<sup>12,13</sup> 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.<sup>14</sup> 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.<sup>15</sup> 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](mailto: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

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<sup>1</sup> 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.

<sup>2</sup> Building U.S. Capacity to Review and Prevent Maternal Deaths. (2018). Report from nine maternal mortality review committees. Available at: [https://reviewtoaction.org/Report\\_from\\_Nine\\_MMRCs](https://reviewtoaction.org/Report_from_Nine_MMRCs)

<sup>3</sup> 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>

<sup>4</sup> 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>

<sup>5</sup> 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>

<sup>6</sup> Sec. 1902(e)(5)

<sup>7</sup> 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/doi/10.1377/hblog20190913.387157/full/>

<sup>8</sup> 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/doi/10.1377/hblog20180917.317923/full/>

<sup>9</sup> 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>

<sup>10</sup> 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>

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

<sup>12</sup> Wisner KL, Sit D KY, 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.

<sup>13</sup> 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

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

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

<sup>15</sup> Ibid.