

April 23, 2021

Ms. Elizabeth Richter
Acting Administrator
Centers for Medicare and Medicaid Services
Mail Stop C5-01-14
7500 Security Blvd.
Baltimore, Maryland 21244

Dear Acting Administrator Richter:

The organizations signing this letter represent the nation's Medicaid health plans, providing coverage to over 55 million individuals in Medicaid, as well as millions of enrollees in Medicare and the health insurance Marketplaces. Collectively, we thank you for your commitment to the health and well-being of our nation's populations. We are proud of our long history of working with CMS, and are hopeful to continue to demonstrate our commitment by supporting new efforts to improve maternal health outcomes.

The American Rescue Plan Act, signed into law last month, secured critical COVID-19 relief for individuals, families, and communities across the nation. Importantly, this new law also advances a key Medicaid health plan priority related to the national effort to combat preventable maternal mortality and morbidity as well as racial and ethnic maternal health disparities. Specifically, this legislation provides states with an option to provide continuous Medicaid eligibility for pregnant individuals through one year postpartum. This policy, which has the potential to expand coverage to 123,000 new mothers, is critical to fighting our nation's maternal mortality crisis and to combatting racial and ethnic inequities in maternal health.¹ Medicaid health plans strongly support this policy, and now strive to ensure it is implemented quickly and efficiently.

With this letter, we urge the Centers for Medicare and Medicaid Services (CMS) to take two actions:

1. **We urge CMS to work with additional states to implement section 1115 waivers that extend continuous, comprehensive coverage to 12 months postpartum.** We were thrilled to see CMS's approval of the Georgia, Illinois, and Missouri waivers earlier this month, and are aware that additional states have submitted or are in the process of developing waivers to extend postpartum coverage. Speedy approval of waivers that extend continuous, comprehensive coverage to 12 months postpartum will add evidence to the growing library of research about the importance of coverage – and Medicaid and CHIP coverage in particular – to maternal health, and will also have the likely effect of encouraging additional states to take up the state plan option when it becomes available to them in April 2022.
2. **We encourage CMS to issue timely and comprehensive guidance to states detailing the opportunity to take advantage of the new state plan flexibility.** We recognize that due to the continuous eligibility maintenance of effort requirement enacted by Congress in the Families First Coronavirus Response Act, people covered in Medicaid may retain eligibility until the end of the public health emergency. Still, timely guidance now will allow states to plan ahead for the end of the public health emergency, and specifically, to work toward ensuring that pregnant and

postpartum women do not experience dangerous gaps in coverage and care when the Department of Health and Human Services declares its end.

Medicaid pays for nearly half of all births in the United States.ⁱⁱ Unfortunately, Medicaid enrollees are 82 percent more likely to experience maternal mortality and morbidity than people who are privately insured.ⁱⁱⁱ The Affordable Care Act's expansion of the Medicaid program has been associated with significant improvements in maternal health outcomes, particularly during the period beginning 60 days after birth, when Medicaid eligibility currently ends for many postpartum individuals, and for non-Hispanic Black women.^{iv} Still, far too many people fall into coverage and care gaps either during their pregnancies or in the months following birth, jeopardizing their health and exacerbating maternal racial and ethnic inequities.

Providing stable health care coverage to everyone eligible for Medicaid and CHIP has long been a top priority for Medicaid health plans, and we view the American Rescue Plan Act's postpartum Medicaid coverage provision as a valuable step toward that goal. Our Medicaid health plan members are working at both the state and federal levels to achieve this essential coverage as soon as possible.

Thank you very much for your consideration. We also look forward to serving as a resource for and partner to the agency as it implements these important steps toward improving maternal health and reducing inequities in maternal health outcomes.

Sincerely,

Alliance of Community Health Plans
America's Health Insurance Plans
Arizona Association of Health Plans
Association for Community Affiliated Plans
Blue Cross Blue Shield Association
Coalition of New York State Public Health Plans
Health Care Service Corporation
Illinois Association of Medicaid Health Plans
Local Health Plans of California
Louisiana Managed Medicaid Association
Medicaid Health Plans of America
Michigan Association of Health Plans
Minnesota Association of County Health Plans
Pennsylvania's Medicaid Managed Care Organizations
Texas Association of Community Health Plans

Cc: Rachel Pryor, Counselor for Health Policy, Department of Health and Human Services
Hannah Katch, Senior Advisor to Administrator, Centers for Medicare and Medicaid Services

ⁱ Urban Institute. Closing Postpartum Coverage Gaps and Improving Continuity and Affordability of Care through a Postpartum Medicaid/CHIP Extension. January 2021. Retrieved from: https://www.urban.org/sites/default/files/publication/103560/closing-postpartum-coverage-gaps-and-care-through-postpartum-medicaid-chip-extension_2.pdf

ⁱⁱ 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>

ⁱⁱⁱ Georgetown University Health Policy Institute – Center for Children and Families. Solution to Maternal Health Crisis Must Center on Medicaid. April 2020. Retrieved from: <https://ccf.georgetown.edu/2020/04/13/solution-to-maternal-health-crisis-must-center-on-medicaid/>

^{iv} Ibid.