

February 13, 2020

The Honorable Alex Azar
Secretary, U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Re: Illinois' Continuity of Care Section 1115 Demonstration Waiver Application

Dear Secretary Azar:

The undersigned organizations appreciate the opportunity to comment on Illinois' Continuity of Care and Administrative Simplification Section 1115 demonstration application. Illinois proposes to extend postpartum coverage for pregnant women from 60 days postpartum to 12 months postpartum for women with incomes at or below 213 percent of the poverty line, and to provide continuous eligibility throughout the 12-month postpartum period.

We strongly support Illinois' proposal and urge you to approve the state's request to extend postpartum coverage. The goal of the proposal — to demonstrate that extending postpartum coverage will reduce maternal mortality and morbidity for lower income women by ensuring their access to Medicaid — promotes Medicaid objectives.

Illinois' Proposal Would Work to Reduce Maternal Mortality in the State

Under federal law, pregnant women receive Medicaid coverage for 60 days postpartum, at which time they must transition to other insurance or become uninsured if they do not remain eligible for Medicaid through another pathway. However, there are necessary treatments and services women need to avoid pregnancy-related complications up to one year after pregnancy. According to recent data published by the Centers for Disease Control (CDC), one-third of pregnancy-related deaths occurred between one week to one year postpartum.¹ Of all pregnancy-related deaths, approximately 60 percent were determined to be preventable. Illinois has experienced high rates of maternal mortality in recent years, especially during the postpartum period, which is in line with a disturbing national trend of increasing maternal mortality rates.²

¹ Centers for Disease Control, "Vital Signs: Pregnancy-related Deaths," May 2019, <https://www.cdc.gov/vitalsigns/maternal-deaths/index.html>; Emily Peterson *et al.*, "Vital Signs: Pregnancy-Related Deaths, United States, 2011-2015, and Strategies for Prevention, 13 States, 2013-2017," May 2019, https://www.cdc.gov/mmwr/volumes/68/wr/mm6818e1.htm?s_cid=mm6818e1_w.

² Rachel Mayer *et al.*, "The United States Maternal Mortality Rate Will Continue to Increase Without Access to Data," *Health Affairs*, February 2019, <https://www.healthaffairs.org/doi/10.1377/hblog20190130.92512/full/>; Marian F. MacDorman *et al.*, "U.S. Maternal Mortality Trends," *Obstetrics & Gynecology*, September 2016, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5001799/>.

In 2015, Illinois had more than 30 pregnancy-related deaths; 33 percent of these deaths occurred after 42 days postpartum up to one year after giving birth.³ A death is determined to be “pregnancy-related” rather than “pregnancy-associated” when death occurs within one year of the end of a pregnancy due to pregnancy complications. The proposal to extend coverage to 12 months after labor and delivery would help address Illinois’ maternal deaths by reducing the likelihood of lower income women having to transition to private insurance with higher out of pocket costs or becoming uninsured, both of which increase the risk of lapses in critical postpartum care.

State and national trends, with respect to both pregnancy-related and pregnancy-associated deaths, reveal very troubling racial disparities in maternal outcomes. Maternal mortality rates are significantly higher for African American women, who are six times more likely than White women to die from a pregnancy-related cause in Illinois.⁴ Extending postpartum coverage to 12 months in Illinois would reduce negative maternal outcomes that disproportionately affect women of color and ensure that all mothers have coverage and access to necessary services which reduce the risk of pregnancy-related deaths.

Extending Postpartum Coverage Would Improve Access to Necessary Postpartum Care and Reduce Coverage Gaps

Medicaid covers nearly half of all births in the state of Illinois. Women with Medicaid coverage at the time of delivery were five times more likely to die from a pregnancy-related cause than mothers with private insurance.⁵ The high rate of pregnancy-related deaths among mothers with Medicaid could be related to the 60-day postpartum coverage cutoff. The abrupt cutoff can thrust new mothers into uninsurance or higher cost insurance, and limit their access to necessary treatments, visits, and medications. A recent study found that 55 percent of women with Medicaid at the time of delivery experienced at least one month of being uninsured in the six months after delivery.⁶

Illinois’ proposal would reduce the likelihood of mothers becoming uninsured in the year following delivery by eliminating the 60-day cutoff. Women would be able to maintain prescribed treatments and recommend check-ups throughout the year with little to no disruption of care and no copayments. Research has shown imposing copayments on low income populations creates barriers to utilization of necessary care and increases financial burdens.⁷ Following pregnancy, mothers remain at risk for a number of complications for up to a year after delivery, including cardiomyopathy and embolism. Despite the health needs new mothers have up to a year

³ Illinois Department of Public Health, “Illinois Maternal Morbidity and Mortality Report,” October 2018, <http://dph.illinois.gov/sites/default/files/publications/publicationsowhmaternalmorbiditymortalityreport112018.pdf>.

⁴ Ibid.

⁵ Ibid.

⁶ Jamie R. Daw *et al.*, “Women in the United States Experience High Rates of Coverage ‘Churn’ in Months Before and After Childbirth,” *Health Affairs*, April 2017, <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.2016.1241>.

⁷ Samantha Artiga, Petry Ubri, and Julia Zur, “The Effects of Premiums and Cost Sharing on Low-Income Populations: Updated Review of Research Findings,” Kaiser Family Foundation, June 2017, <https://www.kff.org/medicaid/issue-brief/the-effects-of-premiums-and-cost-sharing-on-low-income-populations-updated-review-of-research-findings/>.

postpartum, only 60 percent of mothers on Medicaid receive a postpartum visit.⁸ Giving mothers more time to access postpartum care through a longer coverage period will likely result in higher rates of necessary postpartum visits and may provide an opportunity for women to address other health needs that could lead to complications.

Educational guidance for clinicians issued in 2018 by the American College of Obstetricians and Gynecologists (ACOG) and other health professionals, such as the American College of Nurse-Midwives, recommends that postpartum care extend beyond the standard one-time postpartum visit which normally occurs 4 to 6 weeks after delivery.⁹ Instead, ACOG et al recommends a comprehensive postpartum care approach -- Illinois' proposal would enable the state to align its practices with standards of care recommended by the nation's relevant health professionals.

Improved Coverage Among Mothers Will Have a Positive Impact on Their Children as Well

Children would also benefit from this proposal. Research indicates that maternal depression is a significant public health issue. The Illinois Department of Public Health estimates that 1 in 5 new mothers experience postpartum depression, which can last well beyond 60 days after labor and delivery.¹⁰ If left untreated, postpartum depression can interfere with parent-child bonding and have myriad long-term health consequences for both the mother and the baby. Other research indicates that lack of maternal mental health care has adverse effects on a child's cognitive, behavioral, and socioeconomic development.¹¹ Illinois' proposal would enable women to continue to receive covered Medicaid services for chronic disease management, breastfeeding support, and mental health through the first year following delivery— services that ensure healthier parents.

There is also clear evidence that when parents are insured, children are more likely to be insured.¹² The proposal would ensure new mothers have coverage through the first year following delivery which could improve children's coverage rates as well. Furthermore, research indicates that parents having coverage is associated with children being more likely to receive recommended care.¹³

Our comments include citations to supporting research, including direct links to the research for HHS's benefit in reviewing our comments. We direct HHS to each of the studies cited and made available to the agency through active hyperlinks, and we request that the full text of each of the

⁸ Alison Stuebe *et al.*, "Extending Medicaid Coverage for Postpartum Moms," Health Affairs Blog, May 2019, <https://www.healthaffairs.org/doi/10.1377/hblog20190501.254675/full/>.

⁹ The American College of Obstetricians and Gynecologists, "ACOG Committee Opinion," May 2018, <https://www.acog.org/Clinical-Guidance-and-Publications/Committee-Opinions/Committee-on-Obstetric-Practice/Optimizing-Postpartum-Care?IsMobileSet=false>.

¹⁰ Illinois Department of Public Health, "Postpartum Depression in Illinois," http://dph.illinois.gov/sites/default/files/publications/publicationsowhfspostpartum-depression-factsheet_1.pdf.

¹¹ Jamie R. Daw *et al.*, "Women in the United States Experience High Rates of Coverage 'Churn' in Months Before and After Childbirth," *Health Affairs*, April 2017, <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.2016.1241>.

¹² Julie L. Hudson and Asako S. Moriya, "Medicaid Expansion for Adults Had Measurable 'Welcome Mat' Effects on Their Children," *Health Affairs*, September 2017, <https://www.healthaffairs.org/doi/10.1377/hlthaff.2017.0347>.

¹³ Jennifer E. DeVoe, Carrie J. Tillotson, and Lorriane Wallace, "Children's Receipt of Health Care Services and Family Health Insurance Patterns," *Annals of Family Medicine*, September 2009, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2746508/>.

studies cited, along with the full text of our comments, be considered part of the administrative record in this matter for purposes of the Administrative Procedure Act.

For all of these reasons, we urge you to approve Illinois' request to extend postpartum coverage from 60 days to 12 months. Thank you for consideration of our comments. If you need any additional information, please contact Judy Solomon (Solomonn@cbpp.org) or Joan Alker (jca25@georgetown.edu).

American College of Obstetricians and Gynecologists
Center on Budget and Policy Priorities
Children's Defense Fund
Community Catalyst
First Focus on Children
Georgetown University Center for Children and Families
Guttmacher Institute
March of Dimes
Mental Health America
National Alliance on Mental Illness
National Employment Law Project
National Family Planning & Reproductive Health Association
Raising Women's Voices for the Health Care We Need
United Way Worldwide