

Lisa Olson
Medicaid Director
Division of Medicaid Services
Wisconsin Department of Health Services
P.O. Box 309
Madison, WI 53707

RE: Public Comment Providing Evidence Showing Inadequacy of Proposed 30-Day Extension in Wisconsin's Section 1115 Postpartum Coverage Waiver Application

I am writing on behalf of the Wisconsin Alliance for Women's Health (WAWH) in response to the Wisconsin Department of Health Services' (DHS) solicitation of written comments on its Section 1115 Demonstration Waiver Application to the Centers for Medicaid & Medicare Services (CMS), which requests approval to extend postpartum Medicaid coverage from 60 days to 90 days in Wisconsin as authorized by 2021 Wisconsin Act 58.

At the Wisconsin Alliance for Women's Health (WAWH), our vision is that every woman, at every age and stage of life, can reach her optimal health, safety, and economic security. We aim to achieve this by informing, involving, and inspiring individuals to be effective advocates for policy and systems change.

As Wisconsin's leading women's health policy organization, we are deeply disappointed that this waiver application seeks a mere 30-day extension of postpartum Medicaid coverage. While any extension of coverage during this medically vulnerable time is a step forward, an additional 30 days is woefully inadequate. Health care experts, professionals, and organizations agree: the only extension of postpartum Medicaid coverage proven to support improvements in maternal health outcomes is an extension to *one full year*. We hope our comments serve as a reminder that the lives of Wisconsin women should not hang in the balance of incremental change – especially not amidst a growing maternal health crisis in our state.

Black women continue to experience disproportionately high rates of preventable maternal mortality and morbidity. In fact, Black women in Wisconsin are five times more likely to die from pregnancy-related complications and significantly more likely to suffer from severe maternal morbidities than white women.¹ Even more, research reveals that over two-thirds of all pregnancy-related deaths happen in the postpartum period,² sixty percent of which occur due to preventable or treatable causes.³

¹ Wisconsin Department of Health Services, *2016-17 Wisconsin Maternal Mortality Report* (2022). <https://www.dhs.wisconsin.gov/publications/p03226.pdf>.

² Petersen E, Davis N, Goodman D, et al. *Vital Signs: Pregnancy-Related Deaths, United States, 2011-2015, and Strategies for Prevention, 13 States, 2013-2017* (2019). <http://dx.doi.org/10.15585/mmwr.mm6818e1>.

³ *Id.*

Coverage disruptions among those enrolled in Medicaid only magnify these maternal health inequities, as the sudden loss of health insurance – compounded by other societal and systemic barriers – leaves low-income women without access to critical, life-saving postpartum care. With Medicaid paying for seventy seven percent of all Black births in our state, Black women are particularly and disparately impacted by disruptions in postpartum coverage.⁴ And in states where Medicaid hasn't been expanded, continuous coverage is even more restricted. To re-qualify for Medicaid after the prenatal plan ends, a Wisconsin woman must make at or below 100 percent of the Federal Poverty Line (FPL)⁵; a stark contrast to the 306 percent FPL eligibility threshold for the prenatal plan.⁶

If DHS's waiver application is approved, Wisconsin will be the first state in the nation to extend postpartum coverage to just 90 days and to have set this low bar. That's 90 days to recover from childbirth, 90 days to receive follow-up care to complications, 90 days to manage chronic health conditions, and 90 days to address mental health concerns – all while taking care of a newborn. That's why extending postpartum Medicaid coverage to one full year is so important and why we are expressing our concern and disappointment for this inadequate 30-day extension proposal. When Wisconsin has been recognized as the worst in the nation around maternal and health disparities for the last three decades, we must demand meaningful interventions in policies and systems immediately. Extending postpartum Medicaid coverage to one full year is a powerful, proven pathway toward reducing inequities and drastically improve maternal health outcomes in Wisconsin.

Sincerely,



Sara Finger
Executive Director
Wisconsin Alliance for Women's Health

⁴ Tomlin B, McAdams R, Zapata J, et al. *High Black infant mortality in Wisconsin: factors associated with the ongoing racial inequity* (2020). <https://doi.org/10.1038/s41372-020-00906-6>.

See also, Gordon S, Sugar S, Chen L, et al. *Medicaid After Pregnancy: State-Level Implications of Extending Postpartum Coverage* (2021). <https://aspe.hhs.gov/sites/default/files/documents/cf9a715be16234b80054f14e9c9c0d13/medicaid-postpartum-coverage-ib%20.pdf>

⁵ See generally, Wisconsin Department of Health Services, *BadgerCare Plus*. <https://www.dhs.wisconsin.gov/badgercareplus/index.htm>.

⁶ See generally, Wisconsin Department of Health Services, *BadgerCare Plus Prenatal Plan*. <https://www.dhs.wisconsin.gov/badgercareplus/prenatal-plan/index.htm>.