



Friday, January 15, 2021

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
P.O. Box 8016
Baltimore, MD 21244-8016

Re: "Healthy Texas Women Plus" 1115(a) Medicaid Demonstration Amendment

Dear Administrator Verma:

On behalf of the Texas Women's Healthcare Coalition (TWHC), thank you for this opportunity to provide input on the Texas Health and Human Services's amendment to the Healthy Texas Women Section 1115 Demonstration Waiver.

The TWHC and its 87 healthcare, faith, and community-based member organizations are dedicated to improving the health and well-being of women, babies, and families by ensuring access to preventive healthcare for all Texas women. Access to preventive and preconception care—including contraception— leads to better birth spacing, greater access to prenatal care, and healthier babies.

TWHC recognizes the value of maximizing available federal funding, and supports opportunities to strengthen our state's women's health programs. While reviewing HHSC's Healthy Texas Women (HTW) Section 1115 Demonstration Waiver Amendment to include a new program component, HTW Plus, we aim to highlight the considerations below. TWHC urges the Centers for Medicare and Medicaid Services (CMS) to work with Texas to implement the **most effective** policies towards improving women's health.

Provider and Client Outreach and Engagement

An adequate network of qualified providers is essential to a successful healthcare program. This is recognized in the Special Terms and Conditions section of the waiver, which states "Adequacy of Infrastructure. The state must ensure the availability of adequate resources for implementation and monitoring of the demonstration, including education, outreach, and



enrollment; maintaining eligibility systems; compliance with cost sharing requirements; and reporting on financial and other demonstration components."

Current provider recruitment efforts from HHSC are limited to reaching out to health plans. TWHC encourages a requirement to develop and implement a successful recruitment strategy. This can be accomplished through various educational and outreach activities, including, but not limited to:

- Partnering with provider associations, including those for the newly added services including cardiovascular and mental health benefits;
- Delivering proactive, clear communication to existing HTW providers regarding any changes or opportunities they have to expand to include HTW Plus services;
- Offering regular public forums for provider updates and technical assistance;
- Working with stakeholders to amplify and spread awareness; and
- Conducting a readiness review to verify adequate provider capacity. As it does with managed care organizations in the state, Texas can implement a mechanism for determining the capacity of the state to serve eligible women.

It is essential that there be a provider network in place across the state that is able to administer the HTW Plus benefits prior to client outreach. If clients are notified of HTW Plus, but an informed provider network, qualified and ready to render services is not available, clients may become discouraged, which can cause delays in accessing services. If the provider network is not adequately developed, the state risks low utilization of these benefits that could impact budget neutrality.

Elimination of Auto-enrollment in Favor of Administrative Renewals

As part of the HTW waiver, HHSC will end auto-enrollment of new moms transitioning from Medicaid for Pregnant Women into HTW 60 days after childbirth, and replace it with the problematic administrative renewal process. This change—happening at the same time HHSC is rolling out new HTW Plus benefits—will increase burdens on postpartum women, clinic staff, and state eligibility workers, undermining the goals of the HTW Plus Waiver Amendment.

Texas' current system of administrative renewal is not effective. **According to HHSC, fewer than 9% of Medicaid and CHIP clients have their coverage automatically renewed at the end of**



their certification period. In 2019, over 83,000 new mothers were auto-enrolled into HTW.¹ That means, at the current rate for administrative renewals, fewer than 7,470 new mothers will successfully transition into HTW Plus, and the remaining 75,530 new mothers will face obstacles to transfer into HTW Plus, causing delayed or no access to vital postpartum services. Eliminating auto-enrollment will reduce projected cost savings, and add significant red tape for mothers, health care providers, and the state agency.

To mitigate the impact on enrollment in HTW Plus, before eliminating the auto-enrollment process for HTW, HHSC must fix the administrative renewal process for Medicaid enrollees. TWHC recommends CMS work with HHSC to incorporate other allowable policies, such as post enrollment verification, to help women transition successfully from Medicaid for Pregnant Women into HTW Plus. Post enrollment verification allows a better transition for new moms, who can submit pay stubs or other required paperwork during a temporary period (90-day window) after being enrolled. Post enrollment verification is already used in Texas Medicaid for Pregnant Women.

Eliminating the auto-enrollment policy, and replacing it with the current administrative renewal process could negatively impact potential enrollment in HTW Plus and access to postpartum care. Not only does this undermine the goal of improving care and health outcomes of Texas women, it could also impact Texas' ability to achieve the budget neutrality expenditure targets included in the Standard Terms and Conditions of the approved waiver.

Identifying the Most Effective Path Towards Improving Postpartum Healthcare Access

One of the best strategies to address maternal mortality is to ensure women have access to all needed health care before, during, and after pregnancy. The Texas Maternal Mortality and Morbidity Review Committee (MMMRC) listed **improving comprehensive health access before, during, and after pregnancy** as its number one recommendation to combat maternal mortality in its most recent report.² The waiver amendment as proposed does not achieve this due to its limited benefit package and it also fails to acknowledge well-documented racial disparities in maternal mortality or propose targeted efforts to address deep inequities.

¹ Texas Health and Human Services. Women's Health Programs Report Fiscal Year 2019. May 2020. https://hhs.texas.gov/file/132681/download?token=lp_BAp2T

² Texas Health and Human Services (September 2020). Maternal Mortality and Morbidity Task Force and Department of State Health Services Joint Biennial Report. <https://www.dshs.texas.gov/mch/pdf/DSHS-MMMRC-2020-UPDATED-11282020.pdf>.



We encourage CMS to work with Texas to revise its proposal to extend full Medicaid benefits to all pregnant women for one year after the end of their pregnancy. This approach has been recommended by several experts, including Texas' Maternal Mortality Review Committee, as referenced above, which has done exhaustive research for years into the causes of maternal mortality in the state.^{3 4} In addition, over 60 national organizations also support extending Medicaid postpartum coverage to 12 months, including the American Medical Association, the American College of Obstetricians and Gynecologists (ACOG), the American Academy of Family Physicians, March of Dimes, and the Society for Maternal-Fetal Medicine.⁵

TWHC appreciates the opportunity to provide comments and input on the proposed waiver amendment. If you have questions or would like to request additional information please contact Evelyn Delgado at EDelgado@TexasWHC.org or 210-535-6991.

Sincerely,

Evelyn Delgado, Chair, Texas Women's Healthcare Coalition

³ IBID

⁴ Texas Health and Human Services (September 2018). Maternal Mortality and Morbidity Task Force and Department of State Health Services Joint Biennial Report. <https://www.dshs.texas.gov/mch/pdf/MMMTFJointReport2018.pdf>.

⁵ Kohler, A. (2020, August 5). TX Should Take These Steps for Healthy Moms and Babies. Texans Care for Children. <https://txchildren.org/posts/2020/8/4/tx-should-take-these-steps-for-healthy-moms-and-babies>.



Texas Women's Healthcare Coalition Steering Committee Members

Texas Medical Association
 District XI (Texas) American College of Obstetricians and Gynecologists
 Texas Academy of Family Physicians
 Texas Association of Community Health Centers
 Methodist Healthcare Ministries
 Teaching Hospitals of Texas
 Every Body Texas
 Texans Care for Children
 Every Texan
Chair - Healthy Futures of Texas

Texas Women's Healthcare Coalition General Members

- Access Esperanza Clinics Inc.
- Amistad Community Health Center
- Austin Advanced Practice Nurses
- Austin Physicians for Social Responsibility
- AWHONN Texas
- Brazos Valley Community Action Agency, Inc.
- Brazos Valley Nurse Practitioner Association
- Cactus Health
- Cardea
- Center for Community Health, UNTHSC
- Centering Healthcare Institute
- Central Texas Nurse Practitioners
- Children's Hospital Association of Texas
- Circle Up United Methodist Women
- Coalition for Nurses in Advanced Practice
- Coastal Bend Advanced Practice Nurses
- Coastal Bend Wellness Foundation
- Community Healthcare Center
- Consortium of Texas Certified Nurse Midwives
- Department of Pediatrics and Women's Health, UNTHSC
- El Buen Samaritano
- El Centro de Corazón
- El Paso Area Advanced Practice Nurse Association
- Food Bank of the Rio Grande Valley
- Fort Worth Region Nurse Practitioners
- Haven Health
- Hill Country Advanced Practice Nurses & Physicians Assistants Association
- Houston Area Chapter of NAPNAP
- Houston Area Nurse Practitioners
- Improving Maternal Health
- Latina Institute for Reproductive Justice Texas
- League of Women Voters of Texas
- Legacy Community Health Services
- Lone Star Family Health Center
- March of Dimes – Texas
- Mental Health America of Greater Houston
- National Association of Nurse Practitioners in Women's Health
- National Council of Jewish Women—Texas State Policy Advocacy Network
- North Harris Montgomery Advanced Practice Nurse Society
- North Texas Alliance to Reduce Teen Pregnancy
- North Texas Nurse Practitioners
- Nurse-Family Partnership
- Panhandle Nurse Practitioner Association
- Pasadena Health Center
- People's Community Clinic
- Port Arthur Housing Authority
- Pregnancy and Postpartum Health Alliance of Texas SALVERE
- San Antonio Metropolitan Health District
- San Antonio Nurses in Advanced Practice
- Schneider Communications
- South Plains Nurse Practitioner Association
- South Texas Family Planning & Health Corp.
- Southeast Texas Nurse Practitioner Associates
- Special Health Resources
- St. David's Foundation
- Susan Wolfe and Associates, LLC
- Texas Association of Community Health Plans
- Texas Association of Obstetricians and Gynecologists
- Texas Campaign to Prevent Teen Pregnancy
- Texas Council on Family Violence
- Texas Health Institute
- Texas Hospital Association
- Texas Medical Association Alliance
- Texas Nurse Practitioners
- Texas Nurses Association
- Texas Oral Health Coalition
- Texas Pediatric Society
- Texas Unitarian Universalist Justice Ministry
- Texas Women's Foundation
- The Contraceptive Initiative
- The SAFE Alliance
- The Women's Fund for Health Education and Resiliency
- University Health System
- Valley AIDS Council
- Women's & Men's Health Services of the Coastal Bend, Inc.
- Young Invincibles