

May 4, 2022

Ms. Basundhara Rayachaudhuri  
Waiver Coordinator, Federal Coordination, Rules and Committees  
Texas Health and Human Services Commission  
701 W. 51<sup>st</sup> Street  
Mail Code: H310  
Austin, TX 78751

*Via electronic submission to [TX\\_Medicaid\\_Waivers@hhs.texas.gov](mailto:TX_Medicaid_Waivers@hhs.texas.gov)*

**Re: Comments on Texas Healthcare Transformation and Quality Improvement Program Waiver Amendment to Extend Postpartum Medicaid Eligibility**

Dear Ms. Rayachaudhuri:

On behalf of our more than 450 member hospitals and health systems, the Texas Hospital Association is pleased to comment in support of the Texas Healthcare Transformation and Quality Improvement Program (THTQIP) waiver amendment to implement an extension of postpartum Medicaid eligibility from 60 days to six months following delivery or involuntary miscarriage. Texas hospitals strongly supported House Bill 133, 87<sup>th</sup> Legislature, Regular Session, which directed the Texas Health and Human Services Commission (HHSC) to extend Medicaid coverage for this population, and are pleased to see HHSC now moving to implement the extension by Sept. 22, 2022.

In 2020, the Texas Maternal Mortality & Morbidity Review Committee (MMMRC) revealed that 31% of reviewed cases of pregnancy-related death statewide occurred 43 days to one year after the end of pregnancy, and that most of these deaths were from preventable causes. Over half of deliveries in Texas are to mothers enrolled in Medicaid. Accordingly, the MMMRC recommended extending Medicaid eligibility to 12 months postpartum to ensure women with limited financial resources can access the entire continuum of maternal care before post-pregnancy health problems become life threatening.

We commend the legislature's six-month extension of postpartum Medicaid coverage as a tremendous first step on the path to the full year of coverage the MMMRC originally recommended, and that more than half of U.S. states already have proposed or approved in their state Medicaid programs. This waiver amendment will ensure new mothers in Texas can receive prompt treatment for physical and mental health needs, prevent deadly complications, and avoid unnecessary hospitalizations. We look forward to supporting the state with implementation following the transition away from Medicaid continuous coverage that has been effective throughout the COVID-19 federal public health emergency.

Thank you for your consideration of these comments. Should you have any questions, please do not hesitate to contact me at [astelter@tha.org](mailto:astelter@tha.org) or 512-465-1556.

Respectfully submitted,

A handwritten signature in black ink that reads "A Stelter". The signature is written in a cursive style with a large, prominent initial "A".

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Anna Stelter  
Senior Director, Financial Policy  
Texas Hospital Association