

March 12, 2015

Honorable Secretary Sylvia Mathews Burwell
Department of Health and Human Services
200 Independence Ave. SW
Washington, DC 20201

RE: Create a Special Enrollment Period For Pregnant Women

Dear Secretary Burwell:

We, the undersigned organizations, write to urge the Department of Health and Human Services to issue immediate guidance classifying pregnancy as a qualifying event for special enrollment in the health insurance marketplace. The Department has stood on the side of expanding access to coverage for millions of people. We hope HHS will continue to do so by taking this critical step to ensure all pregnant women can access maternity coverage.

In December 2014, 20 organizations – including many of the undersigned groups – submitted comments to the Department detailing the need for a special enrollment period (SEP) for pregnancy. On February 20, 2015, we were disappointed to learn that the Department did not include pregnancy as a trigger for special enrollment in the 2016 Benefit and Payment Parameters final rule.

We were, however, encouraged that the Department left open the possibility of issuing guidance to name additional qualifying life events for special enrollment, including pregnancy. Therefore, we ask that the Department issue such guidance immediately.

While the Affordable Care Act (ACA) has greatly expanded access to maternity care for pregnant women, there are still women who lack access to comprehensive maternity coverage. This population includes pregnant women who are uninsured and do not qualify for pregnancy-related Medicaid or CHIP coverage; are covered on a plan that still does not include maternity coverage (for example, canceled or transitional plans); and have a plan that does not include the full maternity benefits they need.

Prenatal care is critical for the health of women and newborns, but a lack of health coverage proves to be a significant barrier to accessing prenatal care. Without maternity coverage, prenatal care and delivery can cost upwards of \$20,000, without complications.

The serious health risks and high costs associated with pregnancy complications, along with the fact that half of pregnancies are unplanned, weigh in favor of a marketplace SEP for pregnancy. We believe it is of critical importance to decrease the number of women without insurance and reduce the number of plans that do not offer maternity coverage

post-ACA, to ensure that pregnant women have access to the coverage and care they need to stay healthy during pregnancy.

We thank the Department for its efforts thus far to expand access to coverage. We hope that HHS will continue to stand on the side of consumers by acting swiftly to create a special enrollment period for pregnancy.

Thank you for your consideration. Should you have additional questions, contact Christina Postolowski, Health Policy Manager for Young Invincibles, at Christina.Postolowski@YoungInvincibles.org.

Sincerely,

American Congress of Obstetricians and Gynecologists
Association of Reproductive Health Professionals
Association of Women's Health, Obstetric and Neonatal Nurses
California Latinas for Reproductive Justice
California Lesbian, Gay, Bisexual, and Transgender Health and Human Services Network
California Partnership
Children Now
Día de la Mujer Latina
EverThrive Illinois
Families USA
Feminist Women's Health Center, Atlanta, Georgia
Florida CHAIN
Lesbian Health Initiative (LHI)
March of Dimes
Maryland Women's Coalition for Health Care Reform
MomsRising
NARAL Pro-Choice America
National Family Planning & Reproductive Health Association
National Health Law Program
National Women's Health Network
Oregon Foundation for Reproductive Health
Physicians for Reproductive Health
Planned Parenthood Federation of America
Progress Texas
Raising Women's Voices for the Healthcare We Need
Religious Coalition for Reproductive Choice
Sexuality Information and Education Council of the U.S. (SIECUS)
The Children's Partnership
The Service Employees International Union
UltraViolet
WV FREE
Young Invincibles