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Dear Tribal Health Leaders,

The Department of Health (the department) is appreciative of the time taken and thoughtful comments received for the proposed state plan amendments to 1) extend postpartum coverage to eligible pregnant women from 60 days to 12 months; and 2) add an optional Medicaid eligibility category for pregnant women with countable income between 201% - 225% of the federal poverty level (FPL). The following information represents a record of tribal comments (verbatim where included) received from the Alaska Native Health Board and the department response.

Tribal Comments –

Ensuring expanded access to coverage for postpartum women will improve access to critical health and behavioral health care services and improve maternal postpartum outcomes for women in Alaska. Increased access to health care coverage is particularly important for our Alaska Native and American Indian (AN/AI) mothers who experience disparate health outcomes compared to the general population.

The current Medicaid coverage for postpartum mothers is only 60 days, often resulting in a gap in coverage as new mothers and postpartum women transition from one health care coverage to another during a high-need period. Often, mothers who fall off Medicaid coverage struggle to find new health care coverage and may go without any health care coverage. Expanding the period of coverage from 60 days to 12 continuous months ensures access to vital services for postpartum mothers including maternal check-ups, postpartum care, and behavioral health issues. Further, increasing the eligibility for postpartum women ensures that no one falls through the gaps.

AN/AI women and their newborns are overrepresented in adverse outcomes related to maternal and infant health. The national pregnancy-related mortality rate for AN/AI women between 2000-2017 was 29.7 out of 100,000 live births compared to only 12.7 for non-Hispanic white women. Looking at more recent data from 2017-2019, a review of 36 state Maternal Mortality Review Committee's data shows that pregnancy-related deaths for AN/AI women were 93.3 percent preventable. The same 2017-2019 data indicates that of those pregnancy-related mortalities, 31.3 percent were due to mental health conditions, and 29.4 percent of the mortalities occurred between 43-365 days after giving birth, falling largely outside the current 60-day Medicaid postpartum coverage requirement.

In Alaska, AN/AI mothers are the most impacted by pregnancy-related mortality. The majority of pregnancy-related deaths in Alaska from 2014-2018 were linked to drug or alcohol overdose or other medical causes. Overall, 31 percent of pregnancy-related mortality events in Alaska were linked to mental health. All suicides of new mothers during that period were AN/AI mothers, accounting for 20 percent of all pregnancy-related deaths of new AN/AI mothers. Of the Alaska pregnancy-related mortality, 85 percent were deemed preventable. Finally, these concerns are only worsening; the January 2023 Alaska Maternal Mortality Review Findings showed during the COVID-19 pandemic (in 2021), pregnancy-related maternal mortality was 109% higher than the previous 5-year average. These aforementioned statistical measures of human life serve to underscore the importance of expanding health care coverage for new mothers.

## Responses to Tribal Consultation

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ANHB supports this proposed Medicaid SPA to increase access to Medicaid coverage for postpartum individuals. AN/AI mothers and infants experience disparate health outcomes, and we believe that this expanded coverage will serve to better meet the needs of new mothers and their families in the vulnerable period following a pregnancy. Expanded access health care during this time will improve the lives of mothers and their infants who rely on Medicaid for their health care coverage.

Department Response – The department is appreciative of the time spent reviewing these proposed SPAs and the thoughtfulness of the comments. The department is thankful for the support of these amendments that will benefit all eligible Alaskan women.