



Alaska Native Health Board

THE VOICE OF ALASKA TRIBAL HEALTH SINCE 1968

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ALASKA NATIVE TRIBAL
HEALTH CONSORTIUM

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TRADITIONAL COUNCIL

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HEALTH CORPORATION

VALDEZ NATIVE TRIBE

November 27th, 2023

Emily Beaulieu, State Plan Amendment Coordinator
Alaska Department of Health, Office of the Commissioner
3601 C Street, Suite 902
Anchorage, AK 99503
via email: emily.beaulieu@alaska.gov

RE: Proposed State Plan Amendment – Medicaid Postpartum Coverage Expansion and Additional Eligibility

Dear Ms. Beaulieu,

The Alaska Native Health Board (ANHB)¹ writes to provide comment on the proposed regulations relating to the Medicaid State Plan Amendment (SPA) on continuous postpartum coverage to 1) extend the Medicaid postpartum coverage period from 60 days to 12 months for individuals who are eligible for and enrolled in Medicaid during their pregnancy, and 2) add an optional Medicaid eligibility category for pregnant women with countable income between 201%-225% of the federal poverty limit (FPL).

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 services. 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

¹ ANHB was established in 1968 with the purpose of promoting the spiritual, physical, mental, social, and cultural well-being and pride of Alaska Native people. ANHB is the statewide voice on Alaska Native health issues and is the advocacy organization for the Alaska Tribal Health System (ATHS), which is comprised of tribal health programs that serve all of the 229 Tribes and 180,000 Alaska Native and American Indian people throughout the state. As the statewide tribal health advocacy organization, ANHB helps Alaska's Tribes and Tribal programs achieve effective consultation and communication with state and federal agencies on matters of concern.

12.7 for non-Hispanic white women.² Looking at more recent data from 2017-2019, a review of 36 state Maternal Mortality Review Committees' data shows that pregnancy-related deaths for AN/AI women were 93.3 percent preventable.³ 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.⁴ 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.⁵ These aforementioned statistical measures of human life serve to underscore the importance of expanding health care coverage for new mothers.

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.

We appreciate the opportunity to provide comments during this Tribal consultation. If you have any comments or questions regarding our letter, you may contact ANHB by email at anhb@anhb.org or by telephone at (907) 729-7510.

Sincerely,



Chief William F. Smith, Chairman
Alaska Native Health Board
Tribally-Elected Leader of the Valdez Native Tribe

² Heck, J.L., et al. "Maternal Mortality Among American Indian/Alaska Native Women: A Scoping Review", *Journal of Women's Health*, Vol. 30, Issue 2. <https://www.liebertpub.com/doi/10.1089/jwh.2020.8890>

³ Trost, S., et al. "Pregnancy-Related Deaths Among American Indian or Alaska Native Persons: Data from Maternal Mortality Review Committees in 36 US States, 2017–2019", *Centers for Disease Control and Prevention's Maternal Mortality Review*, <https://www.cdc.gov/reproductivehealth/maternal-mortality/erase-mm/data-mmrc-aian.html>

⁴ Alaska Dept. of Health and Social Services, Division of Public Health. "Pregnancy-Associated Mortality in Alaska" January 2020. <https://health.alaska.gov/dph/wcfh/Documents/mchepi/mcdr/2019%20maternal%20mortality%20factsheet%20final.pdf>

⁵ Alaska Dept. of Health, Division of Public Health. "Alaska Maternal Mortality Review" January 2023. <https://drive.google.com/file/d/1AuyX2KJVuITQDTFWfJVng6Jhp6JqXAYU/view>