

Brian P. Kemp, Governor

Caylee Noggle, Commissioner

2 Peachtree Street, NW | Atlanta, GA 30303-3159 | 404-656-4507 | www.dch.georgia.gov

July 20, 2022

The Honorable Xavier Becerra Secretary Department of Health and Human Services 7500 Security Boulevard Baltimore, MD 21244

Mrs. Chiquita Brooks-LaSure Administrator Centers for Medicare & Medicaid Services 7500 Security Boulevard Baltimore, MD 21244

Ms. Anne Marie Costello Acting Deputy Administrator Centers for Medicare & Medicaid Services 7500 Security Boulevard Baltimore, MD 21244

Re: Georgia 's Postpartum 1115 Waiver Demonstration Notice of Termination, Transition and Phase-Out Plan Extension to 12 Months Postpartum Services

Dear Secretary Becerra, Administrator Brooks-LaSure, and Deputy Administator Costello:

In accordance with the general program requirements outlined in the Special Terms and Conditions (STCs) of Georgia's Postpartum 1115 Waiver Demonstration, the Department of Community Health (Department) hereby notifies the Centers for Medicare & Medicaid Services (CMS) of our intent to terminate our Postpartum 1115 Waiver Demonstration which extends postpartum services to six months or 180 days. In lieu of continuing the postpartum 1115 waiver demonstration, DCH has opted to extend postpartum services to a full twelve (12) months, under the state plan, as permitted in section 9812 of the American Rescue Plan Act.

As you are aware, on December 11, 2020, the Department submitted an 1115 Demonstration Waiver Application which sought to extend postpartum services from sixty (60) days to six months or 180 days. The demonstration application was approved by CMS on April 16, 2021 and is effective through March 31, 2026. While the 1115 waiver demonstration proved to be beneficial to Georgia's members, extending postpartum services to a full twelve (12) months will serve to further reduce maternal mortality and morbidity in the state of Georgia and ensure continuity of care for Georgia's mothers.



As required in Section III(9) of the STCs, the Department published on its website the draft transition and phase-out plan for a 30-day public comment period. The notice was posted on the Department's website on June 2, 2022. Interested parties were given until July 1, 2022, to submit written comments. Additionally, the Department hosted two public hearings to allow interested parties the opportunity to provide verbal comments. The public hearings were held on June 6, 2022, and June 9, 2022, via Zoom. The Department received one (1) written comment from the March of Dimes (see attached). There were no verbal comments received. As Georgia does not have tribes, a tribal consultation was not required.

The March of Dimes was in full support of phasing out Georgia's Postpartum 1115 waiver and extending postpartum services to twelve (12) months under the state plan. The March of Dimes noted that the proposed change will reduce maternal mortality, improve maternal health, and promote early detection and treatment of postpartum depression and related mental health conditions. Additionally, the March of Dimes noted that the extension to 12 months postpartum services will reduce the rate of low birthweight and pre-term births, provide wraparound services, reduce healthcare costs, and support providers delivering care in rural communities. The public comments received by the March of Dimes were summarized and shared with the Department's Board in a public forum (via Zoom) on July 18, 2022.

We have included for CMS' review, the public notice which outlines the transition and phase-out plan proposed by the Department and the public comment received from the March of Dimes. The plan details the process by which we will notify affected beneficiaries, the content of the notice to be sent to beneficiaries, the process the state will utilize to conduct redeterminations of Medicaid and CHIP eligibility, and the process for outreach activities.

We look forward to working with CMS on next steps to begin the phase-out process for the Postpartum 1115 Waiver and the transition to twelve (12) months postpartum services under the state plan. Should you have additional questions or concerns, I may be reached at (404) 656-7513 or via email at <u>Irhodes@dch.ga.gov</u>. Please copy Melonie Wilson and I on all correspondence. Ms. Wilson's email address is <u>melonie.wilson@dch.ga.gov</u>.

Sincerely,

Lynnette R. Rhodes, Esq. Executive Director, Medical Assistance Plans

PUBLIC NOTICE

Notice of Termination of Georgia's Postpartum Extension 1115(a) Waiver Demonstration and the Transition and Phase-Out Plan Notice to Extend Postpartum Services to Twelve (12) Months under the State Plan

Pending Centers for Medicare and Medicaid Services (CMS) approval, the Department of Community Health (Department or DCH) proposes to terminate its Postpartum Extension 1115(a) demonstration, which extends postpartum services to six (6) months or 180 days. Upon receiving approval from CMS, the Department will extend postpartum services to twelve (12) months under the state plan.

In accordance with the Special Terms and Conditions outlined in Section III of Georgia's Postpartum Extension 1115(a) demonstration, the Department is publishing this notice in order to solicit public input on the proposed changes. Interested parties will have thirty (30) calendar days from the date this notice is posted to provide comments regarding the proposed termination of the postpartum extension 1115(a) demonstration, the transition and phase-out plan, and the proposed extension to twelve (12) months postpartum services. The dates to comment verbally and in writing are outlined below.

Proposal to Terminate the Postpartum Extension 1115(a) Demonstration

The Department submitted its postpartum extension 1115(a) demonstration application to CMS on December 11, 2020. In its application, the Department noted that maternal mortality continues to be a challenge in Georgia and that most maternal deaths are preventable. Accordingly, the Department sought to extend postpartum services from sixty (60) days to six (6) months or 180 days. The primary goal of the demonstration was to extend access to care and improve continuity of care that would lead to a reduction of maternal morbidity and mortality. The demonstration application was approved by CMS on April 16, 2021 and is effective through March 31, 2026. The approval letter can be accessed by selecting the following links:

http://dch.georgia.gov/document/document/postpartum-ext-demonstration-approval/download

$\underline{https://www.medicaid.gov/medicaid/section-1115-demonstrations/downloads/ga-postpartum-ext-ca.pdf}$

The Department is proposing to terminate its postpartum extension 1115(a) demonstration, effective October 31, 2022, for the following reasons:

- 1. The current 1115(a) demonstration only extends postpartum services to six (6) months or 180 days.
- 2. Per section 9812 of the American Rescue Plan Act, which was signed into law in March 2021, states have the option to extend postpartum services to twelve (12) months under the state plan.
- 3. DCH has opted to extend postpartum services to twelve (12) months under the state plan.

4. Transitioning to twelve (12) months postpartum services under the state plan should extend access to care and improve continuity of care that should lead to a reduction of maternal morbidity and mortality.

The eligibility groups will remain the same under the state plan twelve (12) months postpartum coverage option.

When Will the Twelve (12) Months Postpartum Services Begin?

Upon receipt of CMS approval. CMS must approve the Department's transition and phase-out plan before the Department can begin implementing its phase-out activities. Additionally, CMS must approve the state plan amendment extending postpartum services to twelve (12) months.

Transition and Phase-Out Plan

- 1. Submission of State Plan Amendment:
 - DCH will submit a State Plan Amendment extending postpartum services to twelve (12) months in accordance with the American Rescue Plan Act.
- 2. Process to Notify Affected Members:
 - Members who are receiving postpartum services through the 1115(a) postpartum demonstration will be notified in writing, via U.S. mail, of the state's intent to terminate the 1115(a) postpartum demonstration and extend postpartum services to twelve (12) months. A draft copy of the notice is attached in Appendix A.
 - Members who are receiving postpartum services through the 1115(a) demonstration will be notified of the transition to twelve (12) months postpartum services through direct member outreach.
 - Notice will be placed on the Care Management Organizations' (CMO) member webpages, the DCH webpage, the Gateway system, and the Georgia Medicaid Management Information System (GAMMIS).
 - DCH will engage external stakeholders, provider associations, and advocacy groups, including, but not limited to the following:
 - o Center for Reproductive Rights
 - Maternal Mortality Stakeholders Group (MMSG)
 - Georgians for a Healthy Future (GHF)
 - o Interfaith Children's Movement, Inc. (ICM)
 - o Georgia Obstetrical and Gynecological Society
 - o Black Mamas Matter Alliance (BMMA)
 - Voices for Georgia's Children
 - Georgia Chapter, The American College of Obstetricians and Gynecologists (ACOG)
 - o Georgia Budget and Policy Institute
 - o Georgia Hospital Association (GHA)
 - o Planned Parenthood Southeast
 - o Georgia Chapter, American Academy of Pediatrics (GAAAP)

- 3. Eligibility Re-Determinations and Enrollment Transitions:
 - The state will conduct redeterminations of Medicaid eligibility prior to the termination of the demonstration for the affected members to ensure ongoing coverage for eligible beneficiaries.¹
 - All mothers who are within the six-month postpartum period, under the 1115(a) demonstration, will transition out of the demonstration and will seamlessly receive the remainder of the 12 months postpartum services allowed under the state plan. Members will be notified in writing via U.S. mail and through direct member outreach.
 - All mothers who have completed their six-month postpartum period, under the 1115(a) demonstration, from July 1, 2021, through the termination date will be permitted to receive the remaining six months of postpartum services allowed under the state plan. Members will be notified in writing via U.S. mail and through direct member outreach.
 - Prior to making a determination of ineligibility the state will re-determine eligibility for all affected individuals in order to determine if the individual qualifies for Medicaid under a different eligibility category as required in 42 C.F.R. § 435.916(f)(1).²
 - For individuals determined ineligible for Medicaid and CHIP, the state will determine potential eligibility for other insurance affordability programs and comply with the procedures set forth in 42 CFR 435.1200(e).
 - The state will comply with all applicable notice requirements found in 42 CFR, part 431 subpart E, including sections 431.206 through 431.214.
 - The state will ensure all applicable appeal and hearing rights are afforded to beneficiaries in the demonstration as outlined in 42 CFR, part 431 subpart E, including sections 431.220 and 431.221.
 - If a beneficiary in the demonstration requests a hearing before the date of action, the state will maintain benefits as required in 42 CFR §431.230.
- 4. Benefits and Cost Sharing Requirements:
 - The Medicaid benefit package will not change.
 - There is no cost-sharing, copayment, or coinsurance
- 5. Care Management Organizations (CMO):
 - Members who are enrolled with a Care Management Organization (Amerigroup, CareSource, or Peach State Health Plan) will continue to be enrolled with their CMO and will continue to receive postpartum services for the allowed 12 -month period.

¹ Due to the existing national Public Health Emergency, members will not be terminated at this time.

² Due to the national Public Health Emergency all redeterminations are on hold. Redeterminations will continue upon the termination of the national Public Health Emergency.

- CMO assignment/selection will follow the same process used outside the 1115(a) demonstration. Members who do not already belong to a CMO upon entry into the program will be automatically enrolled into a CMO. Members will then have a 90-day window to switch to a different plan if they choose to before being locked into their assigned plan until their annual anniversary date the following year.
- 6. Aged, Blind, or Disabled:
 - Aged, Blind or Disabled members will continue to be enrolled in traditional Medicaid or Fee-for-Service and will continue to receive postpartum services for the allowed 12-month period.

Transition to Twelve (12) Months Postpartum Services Under the State Plan

Pursuant to 42 C.F.R. § 447.205, the Georgia Department of Community Health is required to give public notice of any significant proposed change in its methods and standards for setting payment rates for services.

Pending Centers for Medicare and Medicaid Services (CMS) approval, the Department of Community Health (Department or DCH) proposes to extend postpartum services from six (6) months to twelve (12) months as allowed under section 9812 of the American Rescue Plan Act.

The transition to twelve (12) months postpartum services is estimated to increase Medicaid expenditures for SFY 2023 as follows:

Program	State Funds	Federal Funds	Total Funds
Low Income	\$27,395,603	\$57,624,504	\$85,020,107
Medicaid (LIM)			

The transition to twelve (12) months postpartum services is estimated to increase Medicaid expenditures for SFY 2024 as follows:

Program	State Funds	Federal Funds	Total Funds
Low Income Medicaid (LIM)	\$29,744,567	\$57,790,945	\$87,535,512

This public notice is available for review at each county Division of Family and Children Services office.

Two opportunities for public comment **via Zoom audio** will be available. There will be **no in-person** attendance at the Department of Community Health (DCH).

Individuals who are disabled and need assistance to participate during this meeting should call (404) 656-4479 at least three (3) business days prior to the scheduled public hearing to ensure any necessary accommodations can be provided.

#1 Jun 6, 2022 11:00 AM Eastern Time (US and Canada)

Join Zoom Meeting

https://us02web.zoom.us/j/89832488281?pwd=MVZXd1BNOTNkOGV0eUcvdFA2Y2ZxUT09

Meeting ID: 898 3248 8281 Passcode: Open One tap mobile +16465588656,,89832488281# US (New York) +13017158592,,89832488281# US (Washington DC)

Dial by your location +1 646 558 8656 US (New York) +1 301 715 8592 US (Washington DC) +1 312 626 6799 US (Chicago) +1 669 900 9128 US (San Jose) +1 253 215 8782 US (Tacoma) +1 346 248 7799 US (Houston) Meeting ID: 898 3248 8281

#2

June 9, 2022 11:00 AM Eastern Time (US and Canada)

Join Zoom Meeting https://us02web.zoom.us/j/87600849632?pwd=MUZ5Y2VKNGNOdStLaWR1WmlmNWFKdz09

Meeting ID: 876 0084 9632 Passcode: Open One tap mobile +13126266799,,87600849632# US (Chicago) +16465588656,,87600849632# US (New York)

Dial by your location +1 312 626 6799 US (Chicago) +1 646 558 8656 US (New York) +1 301 715 8592 US (Washington DC) +1 346 248 7799 US (Houston) +1 669 900 9128 US (San Jose) +1 253 215 8782 US (Tacoma) Meeting ID: 876 0084 9632

Individuals wishing to comment in writing on any of the proposed changes should do so on or before **July 1, 2022**, to the Board of Community Health, Post Office Box 1966, Atlanta, Georgia 30301-1966. You may also email comments to Danisha Williams, <u>danwilliams@dch.ga.gov</u> or fax to 404-651-6880.

Comments submitted will be available for review by submitting a request via email to Danisha Williams, <u>danwilliams@dch.ga.gov</u>. Comments from written and public testimony will be provided to the Board of Community Health prior to the **July 18, 2022**, Board meeting. The Board will vote on the proposed changes at the Board meeting to be held at 10:30 a.m. at the Department of Community Health.

NOTICE IS HEREBY GIVEN THIS 2nd DAY OF JUNE 2022 Caylee Noggle, Commissioner

Appendix A

PROPOSED NOTIFICATION FOR IMPACTED MEMBERS

[Date] [First Name, Last Name] [Member Address] [Member Address] [City, State, Zip Code]

Re: Transition to 12-months postpartum services

Dear [Member Name]:

This is an important notice about your postpartum coverage. We are making a change to your coverage.

On July 1, 2021, the Medicaid agency extended postpartum services from sixty (60) days to six (6) months for eligible pregnant women. This was done through an 1115 demonstration that was approved by the Centers for Medicare and Medicaid Services (CMS). You are currently receiving six (6) months postpartum services through the 1115 demonstration.

In March 2021, a new law was passed that allows state Medicaid agencies to provide twelve (12) months postpartum coverage to eligible pregnant women. The new law is called the American Rescue Plan Act (ARPA). Section 9812 of the American Rescue Plan Act allows the Medicaid agency to provide twelve (12) months postpartum coverage.

We are proposing to end the 1115 demonstration that allows six (6) months postpartum services on or about October 31, 2022. This means you will no longer be enrolled in the 1115 demonstration after October 31, 2022. Instead of receiving six (6) months postpartum services through the 1115 demonstration, we are proposing to *increase your postpartum coverage to 12-months* under the state plan. This will give you access to postpartum services for a longer period of time. You do not have to take any action. Your postpartum coverage will transition to twelve (12) months automatically. We will notify you when this occurs.

If you have any questions, you may contact your assigned CMO using the information below:

Amerigroup:

- Toll Free Number: 800-600-4441
- <u>https://www.myamerigroup.com/ga/georgia-home.html</u>

CareSource:

- Toll Free Number: 855-202-0729
- Website: <u>https://www.caresource.com/ga/</u>

Peach State Health Plan

- Toll Free Number: 866-874-0633
- Website: <u>http://www.pshp.com/</u>

You may also call the Georgia Medicaid member call center at (770) 325-2331 or (866) 211-0950 if you are enrolled in Fee-for-Service or traditional Medicaid.

Regards, Georgia Department of Community Health

TRANSCRIPT

Zoom Public Hearing on NOTICE OF TERMINATION OF GEORGIA'S POSTPARTUM EXTENSION 1115(A) WAIVER DEMONSTRATION AND NOTICE TO EXTEND POSTPARTUM SERVICES TO TWELVE (12) MONTHS UNDER THE STATE PLAN via ZOOM June 6, 2022 11:00 a.m.

We ask that everyone please mute your phones until you are ready to present oral testimony.

Good morning, I am Jeanie Ware an attorney with the Department of Community Health in the Office of General Counsel. Today is June 6, 2022 and it is 11 a.m. This is the Zoom public hearing on the Notice of Termination of Georgia's Postpartum Extension 1115(a) Waiver Demonstration and Notice to Extend Postpartum Services to Twelve (12) Months under the State Plan.

This Public Notice was issued by Commissioner Noggle on June 2, 2022. This notice is incorporated into these proceedings.

Pursuant to 42 C.F.R. § 447.205, the Georgia Department of Community Health is required to give public notice of any significant proposed change in its methods and standards for setting payment rates for services. At the June 2, 2022 DCH Zoom Board meeting the Department received approval to release for public comment this notice.

The public comment period will expire on July 1, 2022. Please note that if anyone wishes to submit a comment in writing, you can fax it to 404-651-6880. You may also email comments to Danisha Williams, <u>danwilliams@dch.ga.gov</u> or mail your comments to the Board of Community Health, Post Office Box 1966, Atlanta, Georgia 30301-1966.

At the conclusion of the comment period all oral comments presented today will be transcribed and provided to the Board of Community Health along with a copy of any written comments received. The Board will be asked to vote on this item for final adoption at its July 18, 2022 meeting.

Each participant on this Zoom that would like to provide oral comment will have an opportunity.

Please limit your comments to 10 minutes, and keep your comments limited to the issues that directly relate to the proposed public notice. At the end of your 10 minutes, if you have not completed your presentation, I may ask for a brief closing statement and you'll be able to submit the remaining comments in writing.

If you would like to make an oral comment, please either state your name or press the "raise hand" icon under the reactions tab located at the bottom of your Zoom screen.

It is now 11:03 a.m. At this point no one has requested to make any presentations. We will go off the record and wait for 10 minutes to see if anyone else joins the Zoom at which time, we will reopen the record and close the hearing.

It is now 11:13 a.m. We are back on the record. Is there anyone that has now joined that would like to present oral testimony? If so, please either state your name or press the "raise hand" icon under the reactions tab located at the bottom of your Zoom screen.

Hearing none, under the terms of the notice, written testimony can still be submitted to the Department until July 1, 2022.

No one having appeared for the public hearing; the hearing is hereby officially adjourned.

TRANSCRIPT

Zoom Public Hearing on NOTICE OF TERMINATION OF GEORGIA'S POSTPARTUM EXTENSION 1115(A) WAIVER DEMONSTRATION AND NOTICE TO EXTEND POSTPARTUM SERVICES TO TWELVE (12) MONTHS UNDER THE STATE PLAN via ZOOM June 9, 2022 11:00 a.m.

We ask that everyone please mute your phones until you are ready to present oral testimony.

Good morning, I am Jeanie Ware an attorney with the Department of Community Health in the Office of General Counsel. Today is June 9, 2022 and it is 11:00 a.m. This is the Zoom public hearing on the Notice of Termination of Georgia's Postpartum Extension 1115(a) Waiver Demonstration and Notice to Extend Postpartum Services to Twelve (12) Months under the State Plan.

This Public Notice was issued by Commissioner Noggle on June 2, 2022. This notice is incorporated into these proceedings.

Pursuant to 42 C.F.R. § 447.205, the Georgia Department of Community Health is required to give public notice of any significant proposed change in its methods and standards for setting payment rates for services. At the June 2, 2022 DCH Zoom Board meeting the Department received approval to release for public comment this notice.

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Hearing none, under the terms of the notice, written testimony can still be submitted to the Department until July 1, 2022.

No one having appeared for the public hearing; the hearing is hereby officially adjourned.

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Shelmekia Hodo Director of Maternal and Infant Health Initiatives

> T (678) 536-7612 E shodo@marchofdimes.org MARCHOFDIMES.ORG

June 21, 2022

Board of Community Health Post Office Box 1966 Atlanta, GA. 30301-1966

Re: Comments on the Georgia Department of Community Health's proposal to terminate its Postpartum Extension 1115(a) demonstration, which extends postpartum services to six (6) months or 180 days and the transition and Phase-Out-Plan to extend postpartum services to twelve (12) months under the State Plan.

Dear Board of Community Health:

On behalf of March of Dimes, we appreciate the opportunity to submit comments in strong support of the Georgia Department of Community Health's (DCH) planned transition and Phase-Out-Plan Notice to extend postpartum services to 12 months under the State Plan Amendment made available under the American Rescue Plan Act of 2021.

House Bill 1114, Regular Session, 2020 sought to improve access by extending Medicaid health insurance for six months after pregnancy. At the time of House Bill 1114's consideration, a handful of states seeking to extend postpartum Medicaid coverage had 1115 waiver requests pending before the Centers for Medicare & Medicaid Services (CMS). Additionally, <u>the American Rescue Plan Act of 2021 had just created a new option to extend Medicaid postpartum coverage to a full year via a state plan amendment (SPA) that became available on April 1, 2022.¹ Today, <u>more than half the states in the U.S.</u> are working to extend postpartum Medicaid coverage for a full year after pregnancy or already have it in place, including California, Kentucky, Louisiana, North Carolina, Oregon, South Carolina, Tennessee, West Virginia, among others.²</u>

Extending postpartum Medicaid coverage will promote health for all mothers and babies. Pregnancy complications – such as postpartum depression, hemorrhage, infection, and cardiac events – remain a concern in Georgia, and may lead to long-term health issues for mothers and babies, costly hospital stays or procedures, and higher expenses to Medicaid and the state.

^{1.} Pub. L. 117-2 (March 11, 2021).

^{2.} Kaiser Family Foundation. <u>Medicaid Postpartum Coverage Extension Tracker</u>. (June 21, 2022).

^{3.} Maternal Mortality Review Committee 2017 Report. <u>Maternal Mortality | Georgia Department of Public Health</u>. (June 21, 2022.



Shelmekia Hodo Director of Maternal and Infant Health Initiatives

T (678) 536-7612 E shodo@marchofdimes.org MARCHOFDIMES.ORG

Georgia has one of the highest reported rates of maternal deaths in the country, with an estimated 199 pregnancy-related maternal deaths per 100,000 live births from 2012-2017.³ Seventy-five percent of those pregnancy-related deaths were determined to be preventable. The Georgia Maternal Mortality Review Committee reported cardiac and coronary conditions as leading underlying causes of those pregnancy-related deaths which occurred most frequently between 43 days to 1-year postpartum³. The MMRC also recommended in its 2012 report that postpartum coverage be extended to one full year to allow sufficient time to address preventable maternal health concerns that persist within the one year following delivery.

Access to medical care during the postpartum period is a critical tool in addressing the state's maternal mortality crisis. More than half of all births in Georgia are covered by Medicaid and by extending the period for postpartum coverage, the state has an opportunity to improve women's health and birth outcomes. Specifically, we believe extending the postpartum coverage would reduce maternal mortality, improve maternal health and promote early detection and treatment of postpartum depression and related mental health conditions. But we also believe it will reduce the rate of low birthweight and preterm births, provide wraparound services to prevent poor birth outcomes in future pregnancies, reduce healthcare costs to the state, and support providers delivering care in rural communities.

We agree that the amendment to extend postpartum coverage to twelve months will have the long-term benefits of improving continuity of care across the life cycle. To ensure healthy pregnancies, healthy births, and thriving families, increased access to health care coverage for Georgia moms – regardless of pregnancy outcome – is needed and this twelve-month extension of postpartum coverage is an important step in achieving those goals.

We appreciate the opportunity to submit comments on these important issues affecting Georgia mothers. March of Dimes looks forward to continuing its work to ensure that Georgia women are healthy before, during and after pregnancy.

Sincerely,

Shelmekia Hodo Director of Maternal and Infant Health Initiatives