



April 29, 2022

Lisa Olson  
Medicaid Director  
Wisconsin Department of Health Services

Attn: Bailey Dvorak

RE: Consideration of an 1115 waiver for post-partum coverage extension to 90 days

*Submitted via [dhspostpartumcoverage1115waiver@dhs.wisconsin.gov](mailto:dhspostpartumcoverage1115waiver@dhs.wisconsin.gov)*

Dear Director Olson:

The Wisconsin Primary Health Care Association (WPHCA) appreciates the opportunity to provide input regarding the application for an 1115 waiver to extend Medicaid coverage for pregnant women from 60 to 90 days post-partum. WPHCA has consistently supported a full year of coverage for women who qualify for Medicaid due to their pregnancy. The medical, mental health, and additional benefits provided under a full year of post-partum coverage are critical to the overall health of both the beneficiary and her family. WPHCA will continue to advocate for this full year of coverage and appreciates the Administration's continued support for this policy for all Wisconsinites, regardless of documentation status.

WPHCA is concerned that if the Center for Medicare and Medicaid services approves a 90-day coverage waiver, a new precedent will be set for states across the U.S. in lieu of pursuing a full year of coverage. The same also applies for the State of Wisconsin, as WPHCA aims to support continued momentum for legislative action to advance the full year of coverage.

However, as the member association for Wisconsin's Community Health Centers, WPHCA also recognizes that extended Medicaid coverage for women that would otherwise become uninsured may increase completion of care plans or reduce the burden of uncompensated care for clinics across the state.

In light of these realities, WPHCA neither supports nor opposes denial of a 90-day post-partum coverage waiver. Thank you for your consideration.

Sincerely,

Richelle Andrae  
Government Relations Specialist  
Wisconsin Primary Health Care Association  
[randrae@wphca.org](mailto:randrae@wphca.org) | (608) 443-2953