



American Cancer Society ☯ Children's Defense Fund-New York ☯ Community Service Society of New York
Empire Justice Center ☯ Institute for Puerto Rican and Hispanic Elderly
Make the Road New York ☯ Medicare Rights Center
Metro New York Health Care for All Campaign ☯ New Yorkers for Accessible Health Coverage ☯
New York Immigration Coalition ☯ Project CHARGE
Public Policy and Education Fund of New York/Citizen Action of New York
Raising Women's Voices-New York ☯ Schuyler Center for Analysis and Advocacy ☯ Small Business Majority

March 12, 2015

Ms. Donna Frescatore
Executive Director
NY State of Health
Corning Tower
Empire State Plaza
Albany, NY 12237

Mr. Troy Oeschner
Deputy Superintendent for Health
NYS Department of Financial Services
One Commerce Plaza
Albany, NY 12257

RE: HCFANY Requests Creation of Special Enrollment Period for Pregnancy

Dear Ms. Frescatore and Mr. Oechsner:

Health Care for All New York (HCFANY) is a statewide coalition of more than 170 organizations seeking to secure affordable, quality health care for all New Yorkers. HCFANY applauds the NY State of Health Marketplace (NYSOH) for successfully enrolling over two million New Yorkers in quality, affordable health coverage.

We write to respectfully request that you create a special enrollment period for individuals who become pregnant. Although most New Yorkers in need of insurance will apply for coverage during the annual open enrollment period, some will need to enroll following certain "qualifying life events" that trigger special enrollment periods. Currently, special enrollment periods exist for the birth or adoption of a child,¹ as well as planned events like marriage² and unexpected events like a job loss.³

Ensuring that individuals have health insurance coverage throughout pregnancy and delivery will improve health outcomes for New York families. According to the Centers for Disease Control, maternity care (including prenatal care and delivery) can decrease or prevent health risks related to pregnancy.⁴ Studies have also shown the potential for prenatal care to reduce pre-term births and

¹ 45 CFR § 155.420(d)(2).

² Id.

³ 45 CFR § 155.420(d)(1)(i).

⁴ Centers for Disease Control and Prevention, *Pregnancy-Related Deaths* (December 17, 2014), <http://www.cdc.gov/reproductivehealth/maternalinfanthealth/pregnancy-relatedmortality.htm>.

improve birth outcomes.⁵ Timely, affordable access to prenatal care is particularly important for women of color, who face significant pregnancy-related health disparities.⁶

Pregnancy and childbirth is an important but expensive life milestone, averaging over \$20,000 in costs even for uncomplicated births.⁷ Without health insurance coverage, pregnant individuals may face insurmountable bills or potentially forego needed care. Additionally, studies suggest that access to prenatal care can save significant money over the long-term. A recent study found that access to prenatal care for younger mothers would save between \$2,369 and \$3,242 per pregnancy.⁸

Due to the association between prenatal care, health outcomes, and cost savings, it is imperative that individuals have the opportunity to enroll in coverage as soon as they discover they are pregnant. As a result, HCFANY respectfully requests that NY State of Health establish a special enrollment period for individuals who become pregnant so that New Yorkers can access timely and affordable prenatal and maternity care.

We appreciate your consideration of a special enrollment period for pregnancy. If you have any questions, please contact Lois Uttley at lois@mergerwatch.org or at (212) 870-2010, or Amanda Peden at apeden@cssny.org or at (212) 614-5541.

Very truly yours,



Lois Uttley, MPP
Director, Raising Women's Voices-NY
Steering Committee Member, HCFANY



Amanda Peden, MPH
Health Policy Associate
Community Service Society of New York

⁵ See, e.g., Institute of Medicine Committee to Study the Prevention of Low Birthweight, PREVENTING LOW BIRTHWEIGHT, 18 (1985), http://www.nap.edu/openbook.php?record_id=512&page=R1.

⁶ AMERICAN CONGRESS OF OBSTETRICIANS AND GYNECOLOGISTS COMMITTEE ON HEALTH CARE FOR UNDERSERVED WOMEN, RACIAL AND ETHNIC DISPARITIES IN WOMEN'S HEALTH, OPINION NO. 317 (2005) <http://www.acog.org/Resources-And-Publications/Committee-Opinions/Committee-on-Health-Care-for-Underserved-Women/Racial-and-Ethnic-Disparities-in-Womens-Health> (highlighting disproportionate levels of pre-term births, maternal mortality and infant mortality among women of color).

⁷ U.S. Dep't. of Health & Human Servs., *The Affordable Care Act and Women: Background on Women's Health in America*, <http://www.hhs.gov/healthcare/facts/factsheets/2012/03/women03202012a.html>.

⁸ William J. Hueston, MD, et al, *How Much Money Can Early Prenatal Care for Teen Pregnancies Save?: A Cost-Benefit Analysis*, 21 J. OF THE AMER. BOARD OF FAM. MED. 184, 187 (2008).