

Texas Health and Human Services Commission
Attention: Basundhara Raychaudhuri
Via Email: Basundhara.raychaudhuri@hhs.texas.gov
Re: Comments on Healthy Texas Women 1115 Demonstration Waiver

Dear Ms. Raychaudhuri:

On behalf of the Texas Women's Healthcare Coalition, thank you for this opportunity to provide feedback on the Health and Human Services Commission's (HHSC) implementation of the Healthy Texas Women (HTW) 1115 waiver. We appreciate all the work and commitment that goes into administering the program and improving women's health.

The Texas Women's Healthcare Coalition (TWHC) and its 89 healthcare, faith, and community based member organizations are dedicated to improving the health and well-being of Texas women, babies, and families by ensuring access to preventive healthcare for all Texas women. Access to these services throughout a woman's reproductive years – including health screenings and contraception – contributes to healthy, planned pregnancies as well as early detection and treatment of cancers and other chronic conditions.

We would like to express our gratitude to HHSC program staff for their strong work in the last year improving the Healthy Texas Women program, addressing provider pain points, and being available for provider troubleshooting and technical assistance. We look forward to continuing our work with staff to implement legislation and funding increases.

Implementation of 2024-25 Women's Health Funding and Riders within House Bill 1 (Appropriations Act) Riders

TWHC is grateful to lawmakers for their historic investment in women's healthcare in the 88th Legislative Session, as well as their support via rider for enrollment navigators and women's preventive health mobile units.

In implementing these investments, we urge HHSC to continue to work closely with women's health stakeholders to swiftly execute new or updated contracts to ensure resources are allocated in the areas of greatest need with an eye to reducing women's preventive health deserts, and making certain all available funds can be utilized.

HTW Application Form

While the goal of the patient navigator funding appropriated in the 2024-25 biennial budget is to promote continuity of care for women support transitioning to HTW, TWHC continues to hear concerns from its members that the long-form MAGI application impedes timely enrollment, thus delaying access to care. Many patients report being unable to provide all required information.

We urge HHSC to submit a request to the Centers for Medicaid and Medicare Services asking that it work with HHSC and women's health stakeholders to streamline the application, including creating a short-form family planning application. As the Medicaid continuous eligibility

unwinding proceeds and women transition from Medicaid to HTW, streamlining the application becomes all the more urgent.

MCO Transition

TWHC commends HHSC for its ongoing collaboration with our members to ensure a smooth transition of HTW from a fee-for-service program to managed care. As the date for this change approaches, we urge HHSC to continue this collaboration to ensure that ample training and technical assistance is provided before, during, and after the MCO carve-in to mitigate any service disruptions and support new patient enrollment.

Leading up to the carve-in, providers continue to express strong concerns about the impact of reimbursement denials or delays, lack of familiarity with women's health programs among MCOs, and inter-network mobility related to the young and highly mobile HTW provider base.

Implementation of 12 Months Medicaid Postpartum Coverage

We are grateful to the legislature for approving HB 12 and urge HHSC to rapidly implement the new benefit by quickly submitting a State Plan Amendment to CMS to obtain approval.

In the meantime, we ask HHSC to collaborate with TWHC to actively educate postpartum women and providers about HTW-Plus, a program designed to provide postpartum women with enhanced benefits and treatment in the year following delivery for a limited set of conditions and diagnoses most closely associated with postpartum complications or death.

HTW-Plus launched in late 2019, only a few months before the federal Department of Health and Human Services declared a COVID-19 public health emergency and Congress enacted legislation establishing continuous Medicaid eligibility throughout the PHE, which temporarily replaced the need for the program. As such, few stakeholders are familiar with the program. Yet, until HB 12 is implemented, HTW-Plus will be an important source of services for postpartum women at highest risk of maternal mortality or morbidity.

Thank you again to HHSC staff for their strong partnership and support. If you have any questions or if we can provide further information, please contact me at (210) 223-4589 or EDelgado@TexasWHC.org.

Respectfully submitted,

A handwritten signature in black ink that reads "Evelyn Delgado". The signature is written in a cursive, flowing style.

Evelyn Delgado
Chair, Texas Women's Healthcare Coalition