

July 27, 2026

Texas Health and Human Services Commission

Re: Comments on Proposed Rule 26R070

On behalf of the Texas Women's Healthcare Coalition (TWHC), thank you for the opportunity to comment on the Proposed Rules for Lactation Consultant inclusion in the Medicaid Program. TWHC and its 75+ healthcare, faith, and community-based member organizations are dedicated to improving the health and well-being of Texas women, babies, and families by improving access to preventive healthcare, including annual exams, cancer screenings, and birth control.

We support the inclusion of multiple certification pathways for Lactation Consultants in Texas, which will prevent further barriers to entry for this service provider. We also have several recommendations to further improve the new rules, and welcome continued discussion and engagement on this topic.

1. Allow lactation consultants to provide services in hospitals that do not have their own lactation consultants on staff. Many rural hospitals cannot afford to employ a lactation consultant. The new Medicaid benefit should allow outside lactation consultants to provide care to mothers during their hospital stay so families in rural communities have the same access to breastfeeding support as those in larger cities.
2. Clarify that lactation services can be provided in individual or group settings and through telehealth.
3. Clarify billing requirements so clinics, hospitals, federally qualified health centers, rural health clinics, and other provider organizations can bill Medicaid on behalf of employed lactation consultants
4. Clarify that lactation consultation services are separately reimbursable from other medical services. This will help ensure providers are appropriately reimbursed and encourage broader participation in the program.

Thank you again for this opportunity. If you have any questions or if we can provide further information, feel free to contact me at Klenau@healthyfutures-tx.org

Respectfully submitted,

Kristen Lenau
Chair
Texas Women's Healthcare Coalition (TWHC)