



Texas Women's Healthcare Coalition

PROMOTING ACCESS TO PREVENTIVE
HEALTHCARE FOR ALL TEXAS WOMEN

July 29, 2026

Texas Health and Human Services Commission

Re: Comments on Proposed Rule - 25R048

On behalf of the Texas Women's Healthcare Coalition (TWHC), thank you for the opportunity to comment on Proposed Rule 25R048. TWHC strongly supports amending 1 TAC §358.540, §366.527, and §366.711 to establish 12-month continuous Medicaid coverage for children under 19, align eligibility effective dates, and remove the interview requirement for the Parents and Caretaker Relatives 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. Adopting these proposed rule changes will directly improve access to timely care, reduce administrative burdens on families, and drive better long-term health outcomes for low-income families across the state.

These proposed amendments represent meaningful improvements to Texas Medicaid by ensuring eligible individuals can access care when they need it most rather than losing coverage due to avoidable administrative barriers:

Ensuring Continuous Coverage for Newborns and Children

Establishing 12 months of continuous Medicaid eligibility for newborns and children through age 19 is one of the most significant steps Texas can take to improve child health outcomes. Specifically, the clear timeline definitions extending newborn coverage from their effective date through the last day of the month of their first birthday, alongside a guaranteed 12-month certification period for recipients under 19, provide necessary clarity and stability for families. Guaranteeing this uninterrupted period prevents children from losing vital health insurance due to minor, temporary income fluctuations or routine procedural delays. Consistent, predictable coverage ensures families can maintain well-child visits, developmental screenings, and immunization schedules without disruption, while also granting children with chronic conditions, such as asthma, diabetes, or epilepsy, steady access to necessary treatments and behavioral health services. Establishing these defined certification windows allows health concerns to be identified early and managed effectively, reducing costly and avoidable hospitalizations while giving Texas children the solid foundation they need to grow and thrive.

Protecting Pregnant Women and Supporting Healthy Births

Protecting the health of young expectant mothers through 12 months of continuous Medicaid coverage is a vital investment in both maternal and infant health outcomes. Findings from the Texas Maternal Mortality and Morbidity Review Committee show that over 80 percent of pregnancy-related deaths in Texas are preventable, and managing pre-existing conditions such as hypertension, diabetes, and depression before and between pregnancies is key to saving lives. Continuous coverage allows young women of childbearing age to manage chronic conditions early, leading to healthier pregnancies and safer deliveries while mitigating heightened risks for severe gestational complications, low birth weight, and preterm labor. Sustaining coverage through pregnancy and the full 12-month postpartum period eliminates critical care disruptions, ensuring young mothers receive essential follow-up care for conditions such as postpartum depression, hypertension, and surgical recovery. Seamless coverage for the young mother guarantees that her newborn experiences an immediate, uninterrupted transition into well-child care and developmental monitoring during the pivotal first year of life. Preventing coverage gaps for young expectant mothers reduces costly emergency room visits and preventable hospitalizations, saving lives and giving both new moms and babies a healthier start in life.



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Removing Administrative Barriers for Parents and Caregivers

Eliminating the interview requirement for initial and renewal applications within the Medicaid for Parents and Caretaker Relatives Program removes a significant barrier that frequently prevents eligible families from obtaining and maintaining coverage. Low-income parents and caregivers often balance unpredictable hourly work schedules, transportation limitations, and caregiving responsibilities that make completing scheduled interviews difficult. Removing this requirement streamlines the enrollment process, eliminates unnecessary administrative burdens, and reduces procedural denials caused by scheduling conflicts rather than loss of eligibility. The TWHC strongly supports this change, as ensuring uninterrupted access to healthcare empowers parents to manage their own health needs, maintain steady employment, and effectively care for their children.

Strengthening Preventive Care and Reducing Healthcare Costs

Establishing continuous Medicaid coverage is a fiscally responsible approach to strengthening preventive care while reducing avoidable healthcare costs across Texas. When coverage disruptions occur, families are forced to delay routine care and manage treatable conditions in hospital emergency departments, escalating uncompensated care burdens for local hospitals and inflating system-wide expenses. Continuous coverage ensures children and young expectant mothers remain connected to low-cost primary care settings where chronic illnesses, developmental delays, and prenatal risks can be identified and treated early. Preventing gaps in coverage directly reduces emergency room visits, avoids costly neonatal intensive care unit admissions, and eliminates the administrative expenses associated with repeatedly disenrolling and re-enrolling eligible individuals. By prioritizing proactive primary care over reactive emergency interventions, these proposed rules promote a healthier population while maximizing the efficiency and financial sustainability of the state healthcare system.

Thank you for the opportunity to comment on these proposed rules. The TWHC strongly supports the Health and Human Services Commission to adopt Proposed Rule 25R048 as written to foster a healthier, more stable future for Texas mothers and their families.

If you have any questions or if we can provide further information, feel free to contact Desiree Ingram at:
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Respectfully submitted,

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