



February 16, 2016

Healthcare Reform Rulemaking Advisory Committee
Oregon Insurance Division
350 Winter St. NE
Salem, OR 97301-38833

RE: Request for Creation of Special Enrollment Period for Pregnancy

Dear Healthcare Reform Advisory Committee Members,

The Oregon CEDAW Coalition writes to respectfully request that you create a special enrollment period for individuals who become pregnant. Although most Oregonians 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, as well as planned events like marriage and unexpected events like a job loss.

While the Affordable Care Act (ACA) has greatly expanded access to maternity care for pregnant women, there are still women who lack access to comprehensive maternity coverage. This population includes pregnant women who are uninsured and do not qualify for Medicaid or CHIP coverage for pregnant women; are covered on a plan that still does not include maternity coverage (e.g. canceled or transitional plans); and have a plan that does not include the full maternity benefits they need.

Ensuring that individuals have health insurance coverage throughout pregnancy and delivery will improve health outcomes for Oregon families. According to the Centers for Disease Control, maternity care (including prenatal care and delivery) can decrease or prevent health risks related to pregnancy. Studies have also shown the potential for prenatal care to reduce preterm births and improve birth outcomes. Timely, affordable access to prenatal care is particularly important for women of color, who face significant pregnancy related health disparities.

The Oregon CEDAW Coalition acknowledges the need for this because access to adequate and affordable prenatal health care is imperative as a human right for all

women. Pregnancy and childbirth is an important but expensive life milestone, averaging over \$20,000 in costs even for uncomplicated births. Without health insurance coverage, pregnant individuals may face insurmountable bills or potentially forgo needed care – creating potentially severe health risks for themselves and their child.

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.

The Oregon CEDAW Coalition respectfully requests that this committee recommend the establishment of a special enrollment period for individuals who become pregnant so that Oregonians can access timely and affordable pregnancy related care.

Sincerely,

Oregon CEDAW Coalition

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