



May 31, 2020

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
200 Independence Avenue, NW
Washington, DC

Dear Administrator Verma:

On behalf of the American Academy of Family Physicians (AAFP), which represents 136,700 family physicians and medical students across the country, I write in response to the [request for information](#) regarding maternal and infant health care in rural communities as released by the Centers for Medicare & Medicaid Services on February 12, 2020.

Maternal Health in the United States

Currently, the United States' maternal mortality rate (MMR) is alarmingly high and reveals existing faults within the health care system. During a time when maternal outcomes were improving for women in most developed countries, the U.S. MMR is worsening.

In the U.S., approximately 700 women die from pregnancy-related complications annually.ⁱ The U.S. also failed to achieve its own Healthy People 2020 maternal health reduction targets.ⁱⁱ Many women in rural areas live in what is termed a "maternal care desert," meaning they live at least one hour away from essential prenatal and obstetric care. With the increasing rates of closure of rural hospitals and obstetric units, pregnant women must travel long distances for maternity care and have worse outcomes.

Family Physicians' Role in Addressing the Maternal Health Crisis

Family physicians have historically provided maternity care, especially with rural and underserved populations. More than one-half of rural hospitals with obstetrics units depend on family physicians to attend births and family physicians continue to attend the majority of births in small hospitals. Twenty eight percent of rural family physicians continue to provide obstetrical services.ⁱⁱⁱ

Understanding family medicine's potential role to improve pregnancy related health outcomes, the AAFP established a maternal health taskforce in 2018. The group identified a series of programmatic and legislative priorities that include retaining obstetric care professionals, supporting maternity care education, increasing the supply of family physicians, reducing health care disparities, improving access to care, and addressing social factors that impact health, also known as social determinants of health (SDoH).

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1. What barriers exist in rural communities in trying to improve access, quality of care, and outcomes in prenatal, obstetrical, and postpartum care?

Rural Hospital Closures. Many challenges of living in a rural area may impact maternal morbidity and mortality. Access to rural hospital obstetrical (OB) services is of significant concern. In 1985, 24% of rural counties lacked hospital-based OB services.¹⁸ As of 2014, 54% were without hospital-based obstetrics.¹⁹ More than 200 rural obstetrical units closed between 2004 and 2014, with additional rural units at risk. In addition to lack of facilities, there are complex issues such as lack of transportation, increased poverty, increased rate of chronic diseases, and difficulty recruiting and retaining physicians to live and work in rural communities.

Rural Workforce Shortages. According to a 2018 March of Dimes [report](#), 5 million women live in obstetric deserts and 1,085 hospitals that do not provide services for pregnant women. This has important implications for maternal health. Studies show family physicians tend to practice within 100 miles of where they are trained and that they are high represented within medically underserved areas. Obstetric care has long been an integral part of family medicine, but the number of family physicians providing high volume obstetric care fell by 50% between 2000 and 2010. This was due in large part to the high cost of malpractice insurance, low rates of payment for obstetrical services, and relative shortage of primary care physicians. **Therefore, CMS should invest in primary care workforce strategies, along with policies that would improve health access and financial viability of providing maternity care for both family physicians and hospitals.**

Experts agree that health care delivery and payment reforms that rely less on the traditional, fragmented fee-for-service system and invest in team-based models hold significant potential for improving health and achieving national priorities, including efforts to reduce adverse pregnancy-related outcomes.

Rural Health Disparities. A CDC study indicated that patients in rural areas tend to have shorter life spans, and access to health care is one of several factors contributing to rural health disparities. The findings highlighted in the CDC's report are consistent with other studies on health equity, including a longitudinal study published in *JAMA Internal Medicine*, indicating that a person's zip code may have as much influence on their health and life expectancy as their genetic code.^{iv}

Current trends in hospital and obstetric unit closures will further increase rural health disparities. There have been 121 rural hospital closures in the last 10 years with an additional 673 facilities which are vulnerable and could close, representing more than one-third of rural hospitals in the U.S. Of the rural hospitals that remain, more than half are not offering maternity care. Currently 18 million women of reproductive age live in rural communities. Distance to maternity care has a direct impact on outcomes for both pregnant women and newborns.

The AAFP believes many health disparities could be addressed by increasing primary care access and supporting programs that address the social factors that impact individuals' health. States with higher primary care physician -to-patient ratios have better health care results, even when controlling for socio-economic and health behaviors. Unfortunately, health care is not distributed evenly across all United States regions

Achieving Equity in Maternal Morbidity and Mortality. Data shows that African American and Native American/Alaska Native women experience maternal health death three to four times more often than white women. Some outcomes are improved through health care access and implementation of best practices, such as group prenatal care visits. But, most community-based programs target the

Medicaid and Children's Health Insurance Program (CHIP) beneficiaries and fail to address women of color who are within higher socio-economic strata, but still experience maternal health disparities.

These disparities widen for low income women and for women living in rural areas. The AAFP recognizes that these unequal outcomes are the consequence of decades of structural and system-wide inequities designed to deliver unequal and disparate care for women of color based on institutionalized racism and the unconscious biases of health care providers towards women of color.

Although implicit predispositions may be difficult to detect, unchecked patient bias can result in lower quality care, which can have very tangible results. **As a result, the AAFP recommends:**

- **educating physicians about implicit bias and strategies to address it to support culturally appropriate, patient-centered care and reduce health disparities**
- educating physicians about inequities in maternal morbidity and mortality and supports strategies that integrate birth equity into the delivery of family-centered maternity care

Additionally, all health care systems, hospitals, clinics and institutions should adopt anti-racist policies that advocate for individual conduct, practices and policies that promote inclusiveness, interdependence, acknowledgment and respect for racial and ethnic differences. These organizations should also take an active approach to dismantling racism by conducting a comprehensive critical examination of policies and procedures, empowering the development of diverse formal and informal leadership and developing a plan that increases accountability, demonstrates transparency, and reorganizes power.

In addition, numerous studies have demonstrated that developing a diverse health care workforce that reflects the communities it serves reduces health disparities. Primary care physicians are most likely to work in medically underserved communities with populations that are also disproportionately minority and low income. **Increasing the number of diverse family medicine physicians who provide obstetric care in these areas in an effective way to address maternal health disparities.**

2. What opportunities are there to improve the above areas (i.e., access, quality and outcomes)?

There is significant need for national attention to equip rural communities that have no or limited birthing resources to be trained and prepared to assist women during their pregnancy journey at all stages. This will require federal agencies, organizations, state and local leaders, and corporations to come together to develop and disseminate resources to train and equip these communities.

The AAFP is leading and encourages policymakers to support an initiative to increase maternity care readiness for practice teams, first responders, hospitals, communities, and maternity care professionals so they are "OB Ready". **It is crucial that low-resource hospitals and communities, where physicians no longer provide obstetrical services, are funded and able to connect with appropriate health care resources to help them become "OB ready" by building competencies in basic and advanced obstetric care. In addition to training, rural medical professionals and first responders need funding to have access to adequate supplies and equipment to respond during obstetric emergencies This includes basic or pre-packaged delivery kits, post-partum hemorrhage kits, and medications for both deliveries and/or common complications.** Currently, this initiative is under development but builds on the [AAFP's Basic Life Support in Obstetrics \(BLSO\) education program](#) that trains first responders, emergency personnel and maternity care clinicians on the standard skills necessary to manage low risk deliveries and obstetric emergencies. The Academy's [Advanced Life Support in Obstetrics \(ALSO\) education program](#) helps train maternity care teams to

manage obstetric emergencies. These evidence-based, interprofessional, and multidisciplinary programs are effective in training medical staff and first responders.

The AAFP is eager to collaborate with CMS on ways to further develop and implement the OB ready concept to better support communities in need.

3. What initiatives, including community-based efforts, have shown a positive impact on addressing barriers or maximizing opportunities?

AIM Maternal Safety Bundles

The [AIM program](#) is designed to “to equip, empower and embolden every state, perinatal quality collaborative, hospital network/system, birth facility and maternity care provider in the U.S. to significantly reduce severe maternal morbidity and maternal mortality through proven implementation of consistent maternity care practices that are outlined in maternal safety bundles (action systems).”⁵ The AIM maternal safety bundles represent best practices for maternity care and are developed and endorsed by national multidisciplinary organizations. The AIM program has been used concurrently with recent maternal safety initiatives, including MMRCs. The AAFP helps develop the AIM maternal safety bundles through its participation in ACOG’s Council on Patient Safety in Women’s Health Care, a collaboration of professional organizations in women’s health care.

CMQCC Maternal Quality Improvement Toolkits

According to the California Maternal Quality Care Collaborative, [Maternal Quality Improvement Toolkits](#) “aim to improve the health care response to leading causes of preventable death among pregnant and postpartum women[,] as well as to reduce harm to infants and women from overuse of obstetric procedures. All toolkits include a compendium of best practice tools and articles, care guidelines in multiple formats, a hospital-level implementation guide, and a professional education slide set. The toolkits are developed in partnership with key experts from across California, representing the diverse professionals and institutions that care for pregnant and postpartum women.”⁸

Maternal Mortality Review Committees

Maternal mortality review committees play an important role in collection and dissemination of maternal health data. Many U.S. states have begun the process of implementing MMRCs, with a goal of collecting information that will help researchers, policymakers, and medical clinicians identify the key factors found in maternal deaths. MMRCs study local maternal death cases to identify strategies for making pregnancies safer and preventing tragic outcomes. It is important for all stakeholders to support these committees and for family physicians to participate in these collective efforts.

As MMRCs have emerged, it has become evident that defined data standards would allow better access to population health data across state lines. The CDC partnered with MMRCs and subject matter experts to create the Maternal Mortality Review Information Application (MMRIA).⁶ MMRIA provides standardized data that can be used for surveillance, monitoring, and research related to maternal mortality. It also provides a common data language to help MMRCs collaborate in case review and analysis.

Strong Start for Mothers and Newborns Initiative (Strong Start). In 2014 the Centers for Medicare & Medicaid Services, Health Resources and Services Administration, and Administration of Children and Families supported the Strong Start medical home prenatal care model to improve maternal and birth outcomes. The Strong Start program paid enhanced rates to state agencies, health networks, and provider groups to help fund enhanced prenatal care and care coordination. Although the birth outcomes and participation rates were limited, the program was shown to reduce elective caesarian

sections by 40%, and thus reduced women's risk for adverse maternal events. The AAFP worked to advance this initiative and urged one hundred hospitals to reduce the number of early nonmedically indicated elective deliveries. Although the program ended, the evidence indicates that the medical home model is an important delivery reform that can increase best practices, improve outcomes, and produce savings.

Medicaid Medical Home Models. State Medicaid programs are also advancing medical home models, such as the Centering Pregnancy, a group prenatal model.^v Many of these innovations show promising results for promoting health equity, emphasizing both maternal and child well-being, identifying maternal depression, and addressing beneficiaries' SDoH. Family physicians actively participate in the Medicaid program and the AAFP has consistently supported state Medicaid expansion. **The AAFP believes adequate Medicaid coverage could play a pivotal role in driving down maternal mortality rates and providing much-needed economic support for critical access hospitals. This can only be achieved by maintaining program stability, enhancing federal medical assistance percentage (FMAP) rates, and increasing the program's low reimbursement payment levels to at least Medicare levels.**

4. How can CMS/HHS support these efforts?

Increasing health care access must be a top maternal health care priority. Patients with a usual source of care, which is fundamental among primary care physicians, have fewer expensive emergency room visits and unnecessary procedures than those without it. These patients benefit from better coordination services, such as after a hospital discharge. Therefore, we assert that physician medical care should be accessible for all who need it. Women receiving no prenatal care are three to four times more likely to have a pregnancy-related death than women who receive prenatal care.^{vi} Strategies to increase access include expanding health care coverage, reducing health insurance barriers, and supporting quality improvement best practices.

The leading causes of pregnancy-related morbidity and mortality include hemorrhage, infection, cardiovascular conditions, preeclampsia, eclampsia, and embolism. Many women suffer pregnancy complications that are not life threatening, but their health may still be undermined. Therefore, it is important that policymakers consider how guarantee that women can access uninterrupted care after childbirth. The AAFP encourages CMS to prioritize the following strategies to support maternal health care in rural communities:

1. Improving High Deductible Health Care Plans (HDHPs). While HDHPs play an important role in expanding access to affordable health care coverage, the deductibles associated with the plans are becoming a health care barrier. In fact, data show that beneficiaries with these insurance plans are likely to put off essential care or tests. Spending thousands of dollars before reaching one's deductible creates a significant financial strain, especially for unplanned pregnancies. **Understanding this, AAFP supports introduction of the *Primary Care Patient Protection Act of 2019 (H. 2774/S. 2793)*. The bill would require HDHPs to provide two primary care visits, which could include family physicians or Ob/Gyns, without cost sharing.** Although this does not provide comprehensive prenatal coverage, it does ensure some minimum level of health care access.
2. Expanding Medicaid Coverage. Currently, 25 million women are enrolled in the Medicaid program and 67% are in their reproductive years and 43% of all U.S. births occur among Medicaid recipients. Currently, 14 states discontinue Medicaid maternity coverage 60 days postpartum which is when 70% of complication occur. These policies leave women without access to care or support for problems during a critical time. For this reason, there is a

sustained effort to expand Medicaid coverage into more states. **The AAFP urges CMS to endorse legislation to expand coverage for up to a year after giving birth. The *Helping Medicaid Offer Maternity Health Services Act (HR 4996)*, will allow state Medicaid coverage for postpartum mothers up to one year after delivery and includes enhanced 5% FMAP to encourage state support.**

3. Medicaid Payment Parity. **Increasing Medicaid primary care payment rates to no less than the comparable Medicare payments is an important AAFP priority and we urge CMS and HHS to support these efforts as well.** Medicaid payment rates continue to lag those of Medicare; nationwide, Medicaid payment rates are two thirds that of Medicare, but can be worse depending on the state. Research has suggested that low Medicaid payment rates has led to lower physician participation and limited access to physician care leads individuals to seek primary care at hospital emergency rooms. Increasing primary care rates in Medicaid is critical to ensuring access to primary care, leading to better quality of care for patients and decreased costs for the states.
4. Quality Improvement. According to the CDC, 60% of maternal deaths are preventable. Increasing health care access is inadequate if consistent protocols are not in place to reduce patient risks, identify health complications, and respond when emergencies arise. The AAFP supports quality improvement initiatives such as the Alliance for Innovation in Maternal Health (AIM) Program, safety bundles, perinatal care collaboratives. The AIM Program is a national multidisciplinary, intergovernmental initiative where stakeholders identify and implement best practices for improving patient health and safety. Maternal safety bundles are a set of small, straightforward evidence-based practices, which when implemented collectively and reliably, have improved patient outcomes and reduced maternal mortality. **The AAFP encourages CMS to support the *Maternal Health Quality Improvement Act (HR 4995)*, a bill that supports the AIM program and the development and implementation of outpatient maternal safety bundles.** Quality improvement activities led to a dramatic reduction in maternal deaths in the state of California. These efforts are led by the state's Department of Public Health and the California Maternal Quality Care Collaborative and should be scaled up at a national level.
5. Enhancing the Primary Care Workforce. **The AAFP recommends training models that produce enough primary care physicians to meet state population needs and to reduce current maldistribution challenges that significantly impact rural communities.** The Teaching Health Center Graduate Medical Education Program (THCGME) addresses that by training primary care and other needed specialties in outpatients, community-based settings. The THCGME program has a strong track record of attracting and retaining physicians to medically underserved area (MUA) since its creation in 2010. **The AAFP supports funding Teaching Health Centers with Medicare Direct Graduate Medical Education payments.**

The AAFP also supports the *Rural Physician Workforce Production Act of 2019 (S. 289)*, which would provide federal support for rural residency training and help alleviate physician shortages in rural communities. Evidence indicates that one of the most promising ways to recruit physicians to practice in rural areas is through rural experiences during their residency training. Currently, numerous incentives in the Medicare program discourage hospitals—even those in communities that desperately need new physicians—from providing such opportunities. The financial incentives specified in the *Rural Physician Workforce Production Act* would also extend to urban hospitals for the purpose of growing the number of residents in rural training tracks.

6. Attracting and Retaining Family Physicians.

Family Physicians are important maternal health stakeholders because of where they practice and how they are trained to care for a broad range of patients. Family physicians deliver babies, care for children, provide prenatal care, and are adept at addressing complex chronic health challenges. According to a 2014 *Journal of the American Board of Family Medicine* study, primary care physicians were more likely than others to address concurrent medical problems among pregnant women. This is an important consideration given the association of chronic disease with both maternal mortality and post-partum complications. **Recognizing family physicians' role in providing a range of health care services for women, the AAFP created the 25x2030 initiative to grow and retain the primary care doctors. The Academy strongly encourages CMS to implement proposals to retain other clinicians providing obstetrical services in rural communities.**

There are numerous factors that influence primary care workforce retention including medical education debt, high medical liability premiums, low payment reimbursement, and physician burn out. There is consistent U.S. and global data indicating that primary care shortages will require meaningful reforms, including policies to address where doctors are distributed and strategies to retain doctors within medically underserved communities.^{vii} **The AAFP supports primary care preceptor incentive programs that provide tax credits to encourage family physicians who may wish to mentor medical students, residents, and new physicians.**^{viii} Five states (CO, GA, HI, MD, SC) have enacted preceptor tax credit programs. Preceptorship programs have shown significant results in influencing medical students to choose primary care. However, these state programs have suffered due to decreased funding and recruitment challenges.

7. Data Collection and Effective Evaluation to Improve Outcomes and Quality

States created Maternal Mortality Review Committees (MMRCs) to collect and analyze maternal death data to understand the cause of maternal death and to inform policy solutions. Recognizing the value of MMRCs, the *Preventing Maternal Deaths Act of 2018* expanded these multidisciplinary teams nationwide. This progress is important because MMRCs have helped support improvements in the state of California and other jurisdictions, but more states need to develop their own boards. For example, 12 states have not yet established MMRCs.^{ix} This represents an underutilized resource that can help inform new policy solutions. Policymakers should consider increasing incentives and enacting legislation to standardize data collection efforts. **The AAFP urges CMS to support the MOMMA's Act (S.916) and Rural MOMS Act (S. 2373), to streamline data collection.**

8. Social Services Aimed at Supporting Mother and Child Wellbeing

Social service programs with the greatest potential for addressing maternal and child well-being are those that address SDoH, emphasize health, incorporate behavioral health, and support the needs of mothers and infants simultaneously. **We know that social factors outside of the health care sector impact patients' ability to achieve optimal health, the AAFP urges funders, including the federal government, to provide adequate funding for SDoH and related programs.**

9. AAFP's Neighborhood Navigator. Consistent with the AAFP's commitment to achieving health equity, the organization urges members to understand and respond to patients' SDoH. **The AAFP developed a new SDOH screening tool as part of an initiative called the EveryONE Project, and actively promotes this tool to our members. The Academy**

also offers family physicians use of the AAFP's nationwide [Neighborhood Navigator](#) referral network, which connects patients to food, housing and other resources to address SDOH based on their individual needs. A 2017 survey that found that nearly 60% of family physician respondents indicated that they screen patients for SDOH and 52% said they followed up on referred patients to community-based social services.

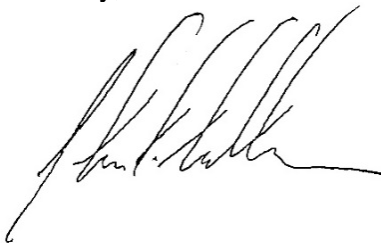
10. Home Visiting. One highly effective maternal and child well-being program is home visiting, where nurses, doctors, or social workers provide home-based health care, coaching, behavioral health screening, and parenting support for vulnerable pregnant and postpartum women and their children.

Programs are usually funded with public and private funding. The federal Maternal Infant and Early Childhood Home Visiting (MIECHV) program achieved positive maternal and child health outcomes, increased children's educational readiness, and reduced Medicaid spending. Home visiting also helps connect mothers and their children with social services. Through this effort, home visiting programs work to advance outpatient maternal health safety bundles. During the program's reauthorization, Congress increased funding to address maternal mortality and morbidity. This is an important development because of the program's history of success. But only a small fraction of the potential families receive these services. Medicaid has become a financing option for home visiting services and we encourage CMS to support and extend the program.

The United States currently has worsening maternal health outcomes. The reasons are multifactorial, but family physicians are essential for improving these statistics. The AAFP looks forward to working with CMS to address these issues.

Please contact Robert Bennett, Federal Regulatory Manager, at 202-655-4908 or rbennett@aafp.org with any questions or to engage the AAFP further.

Sincerely,



John S. Cullen, MD, FAAFP
Board Chair

ⁱ U.S. Centers for Disease Control and Prevention, May 2019 Vital Signs, Pregnancy Related Deaths Fact Sheet, accessed online: <https://www.cdc.gov/vitalsigns/maternal-deaths/index.html>

ⁱⁱ Maternal Health in the United States, Harvard Chan School.

ⁱⁱⁱ Kozhimannil KB, Casey MM, Hung P, et al. The rural obstetric workforce in US hospitals: challenges and opportunities. *J Rural Health*. 2015;31(4):365–372.

^{iv} Dwyer-Lindgren L, Bertozzi-Villa A, Stubbs RW, Morozoff C, Mackenbach JP, van Lenthe FJ, Mokdad AH, Murray CJL. Inequalities in Life Expectancy Among US Counties, 1980 to 2014: Temporal Trends and Key Drivers. *JAMA Intern Med*. 2017;177(7):1003–1011. doi:10.1001/jamainternmed.2017.0918

^v Waldrop T, Center for American Progress, Improving Women's Health Through Delivery System Through Payment and Delivery System Reform, accessed online: <https://www.americanprogress.org/issues/healthcare/reports/2019/06/28/471445/improving-womens-health-outcomes-payment-delivery-system-reform/>

^{vi} Contraception Journal, [https://www.contraceptionjournal.org/article/S0010-7824\(10\)00685-2/pdf](https://www.contraceptionjournal.org/article/S0010-7824(10)00685-2/pdf)

^{vii} Verma P, Ford JA, Stuart A, Howe A, Everington S, Steel N. A systematic review of strategies to recruit and retain primary care doctors. *BMC Health Serv Res.* 2016;16:126. Published 2016 Apr 12. doi:10.1186/s12913-016-1370-1, accessed online: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4828812/>

^{viii} AAFP Backgrounder, Family Physician Tax Preceptor, 2020, accessed online: <https://www.aafp.org/dam/AAFP/documents/advocacy/workforce/gme/BKG-PreceptorTaxCredit.pdf>

^{ix} Review to Action, MMRC Map, accessed online: <https://reviewtoaction.org/content/mmr-map>