

August 10, 2020

Anne Marie Costello

Deputy Director, CMCS

Centers for Medicare and Medicaid Services

7500 Security Boulevard

Baltimore MD 21244

Re: Postpartum & Prenatal Depression “Core Set” Measures

Dear Deputy Director Costello,

The undersigned organizations, which represent the nearly four million women who deliver each year, and the providers who serve them, are writing to support the committee’s recommendation to adopt the NCQA postpartum depression screening and follow up measure and also to urge you to adopt the prenatal depression depression screening measure.

As the committee is aware, maternal depression has significant consequences for women, their infants and families. Postpartum depression hinders infant attachment and bonding and can lead to developmental disorders that last into adolescence and beyond (Field, 2010; Kingston, 2012; Dawson, 1999). During infancy, important caregiving activities such as breastfeeding, sleep, adherence to well child visits and vaccine

schedules can be compromised in depressed mothers (Field, 2010; Gregory, 2015; Minkovitz, 2005).

Further, research has demonstrated up to 17% of women will suffer from prenatal depression (Pearson, 2019). Women with untreated depression during pregnancy are at risk of developing severe postpartum depression and suicidality, and of delivering premature or low birthweight babies (Chan, 2014).

Depression during pregnancy can result in alterations to the DNA of the developing fetus. In this case, the mother transmits the trauma and stress of the psychological condition that she is experiencing into the biology of her offspring. Therefore, decreasing the rates of fetal exposure to prenatal depression or anxiety is essential in protecting the next generation. (Van den Bergh, 2004; Wadhwa, 1993; Field, 2003; Field, 2004)

Because of this compelling research, and because prenatal screening helps raise awareness of maternal depression including postpartum depression, we urge you to adopt both of the maternal depression measures developed by NCQA:

- Prenatal Depression Screening and Follow
- Postpartum Depression Screening and Follow-Up

Sincerely,

2020 Mom

Academy of Lactation Policy and Practice

American Academy of Nursing

American Association for Psychoanalysis in Clinical Social Work

American Association of Birth Centers

American Association of Suicidology

American College of Nurse-Midwives

American Foundation for Suicide Prevention

American Medical Women's Association

Anxiety and Depression Association of America

Aspen Health and Wellness, LLC

Association for Ambulatory Behavioral Healthcare

Association of Women's Health and Neonatal Nursing of California

California Nurse-Midwives Association

Cherished Mom

Clarity Counseling

Commission for the Accreditation of Birth Centers

Didi Hirsch Mental Health Services

Doula At Your Cervix

Every Mother Counts

First 5 Association of CA

Foundation for the Advancement of Midwifery

Global Alliance for Behavioral Health and Social Justice

HealthNet

Healthy Children Project, Inc.

Healthy Mothers, Healthy Babies - the Montana Coalition

International OCD Foundation

International Society of Psychiatric-Mental Health Nurses
(ISPN)

Jewish Healthcare Foundation

Johns Hopkins Women's Mood Disorders Center

Lamaze International

Lifeline4Moms Center at the University of Massachusetts
Medical School

Mamatoto Village Inc

March of Dimes

Maternal and Child Health Access

Maternal Mental Health Leadership Alliance

MomsRising

National Alliance on Mental Illness

National Association for Rural Mental Health

National Association of Nurse Practitioners in Women's Health

National Association of Social Workers (NASW) California Chapter

National Birth Equity Collaborative

National Center for Youth Law

National Eating Disorders Association

National Federation of Families for Children's Mental Health

National Partnership for Women & Families

North American Society for Psychosocial Obstetrics and Gynecology (NASPOG)

Perinatal Support Washington

Postpartum Health Alliance

Postpartum Resource Center of New York

Postpartum Support International

Preeclampsia Foundation

Return to Zero: HOPE

Run Tell Mom LLC

Society for Maternal-Fetal Medicine

Supporting Mamas

The California Children's Trust

The Children's Partnership

The National Alliance to Advance Adolescent Health

The Tatia Oden French Memorial Foundation

University of Washington Maternal-Child Health Program

Utah Association for Infant Mental Health

Women and Girls Foundation

Instructions for submission:

Public comments may be submitted via email
to

MACCoreSetReview@mathematica-mpr.com

by 8 PM ET on Monday, August 10, 2020.

Please include "2021 Core Set Review Public
Comment" in the subject line.

