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 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’ 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.