



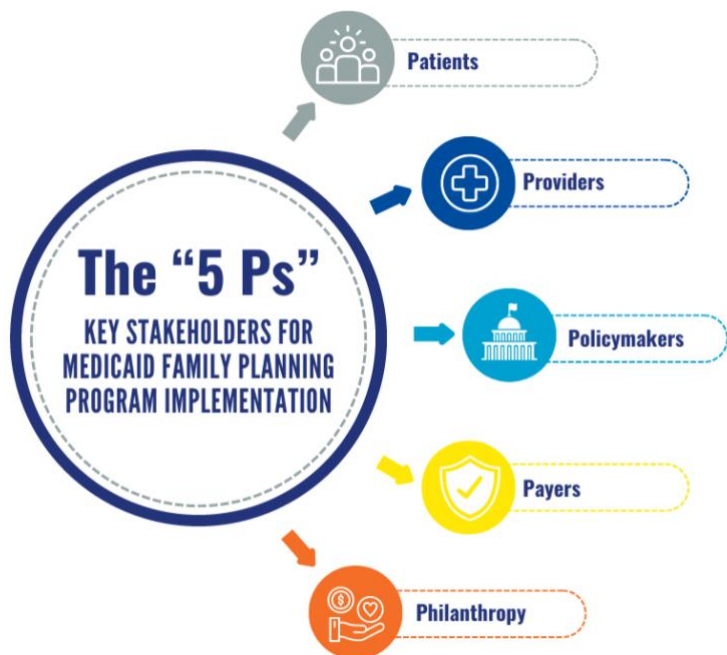
# Implementing a model reproductive justice-aligned Family Planning State Plan Amendment (SPA) in Illinois

## BACKGROUND

Implementing Contraceptive Access Now (ICAN!) is an ambitious initiative to advance contraceptive equity by de-siloing, de-stigmatizing, and normalizing birth control as basic healthcare. ICAN!'s reproductive justice-informed, systems-change approach seeks to transform the way contraceptive care is delivered, covered, and accessed with a focus on equity and sustainability. Through contraceptive coverage policy optimization and implementation, ICAN! works to effect lasting change at the provider, patient, and payer levels.

In 2021, ICAN! led the development and advancement of a model, reproductive justice-aligned Family Planning State Plan Amendment (SPA)—now known as the HFS<sup>1</sup> Family Planning Program—in Illinois. Up to **1.2 million people** are eligible for coverage under the new Medicaid family planning program, including **over 200,000 who are truly uninsured**.

As reproductive health practitioners and policy advocates, the ICAN! team knew that the adoption of this policy in November 2022 was the starting point on the road to true impact, not the finish line. ICAN! has since taken the lead in implementing this program as a “systems orchestrator”, working in collaboration with stakeholders spanning the “5 Ps” (P\_rviders, P\_atients, P\_ayers, P\_olicymaker, and P\_hilanthropy). ICAN!'s goal is to ensure that the promise of the HFS Family Planning Program—to provide greater access to essential preventive and primary care services for people with low-incomes—is fulfilled.



<sup>1</sup> “HFS” is the Illinois Department of Healthcare and Family Services which administers the state’s Medicaid program.

Our work has been guided by 3 key objectives:

1. To include a robust SCOPE OF COVERED SERVICES that ensures access to comprehensive and high quality reproductive and preventive health care.
2. To maximize ENROLLMENT in Medicaid coverage so that financial barriers are removed for the greatest number of people in need.
3. To ensure UTILIZATION of coverage so that enrolled patients are connected to care.

## THE NEED

Illinois has always been a leader in reproductive rights—advancing numerous policies that safeguard abortion access and promote the delivery of high-quality reproductive health care. As a Medicaid expansion state, as well as the first state in the country to extend full Medicaid benefits for moms and babies from 60 days to 12 months postpartum, Illinois strives to meet the health care needs of vulnerable populations.

And yet, prior to the advancement of the Family Planning SPA, the reality on-the-ground was that people of color and people with low incomes faced barriers to accessing birth control and experienced persistent disparities in sexual, reproductive, and maternal health outcomes. An estimated 500,000 people in Illinois lacked coverage for contraceptive care, and just 1 in 5 women receiving care at Illinois community health centers received contraceptive counseling. Nearly 800,000 women lived in counties without a single health center offering the full range of contraceptive options.

ICAN! believed that through a robust and inclusive Family Planning SPA we could:

- Come close to eliminating the contraceptive coverage gap in Illinois.
- Continue the momentum to care for mothers postpartum (at 12 months and 1 day) and across the reproductive health lifespan.
- Provide primary care providers a path for reimbursement of family planning and family planning related services and accountability for delivery of high-quality care.
- Serve as a model for other states interested in expanding and optimizing Medicaid coverage for family planning services.

## DEVELOPING A ROBUST AND INCLUSIVE FAMILY STATE PLAN AMENDMENT

ICAN! supported our state Medicaid agency—the Illinois Department of Healthcare and Family Services (HFS)—to draft a Family Planning SPA aligned with reproductive justice principals and include best practices for contraceptive care delivery. The core tenets of the SPA were designed to be:

√ **Comprehensive:** provides coverage for family planning and related services:

- All FDA-approved birth control methods, including barrier methods, emergency contraception, IUD, implant, pills, condoms, patch, ring, Depo-Provera, tubal ligation and vasectomy.
  - STI testing/treatment and HIV testing/prevention with PrEP and PEP.
  - Screening for breast cancer (mammogram).
  - Screening and treatment for cervical cancer (pap & colposcopy).
  - Treatment for genital/urinary infections (i.e. UTI).
  - Vaccines related to sexual health (i.e. HPV vaccine).
  - Abortion care.
- √ **Equitable:** the SPA increased eligibility for coverage from 138% FPL to < 213% FPL. Income eligibility based on individual, rather than household income, and each individual is counted as a household size of two (making income eligibility determination closer to 283% FPL.) Coverage is open to all genders and ages.
- √ **Timely:** includes Family Planning Presumptive Eligibility (FPPE) for immediate, temporary coverage regardless of citizenship. This allows patients to obtain immediate coverage without having to wait for approval. FPPE means patients can avoid multiple visits and obtain the method of their choice same day—a key component of high-quality contraceptive care.
- √ **Confidential:** open to individuals with existing insurance who have confidentiality concerns due to intimate partner violence or because they are a young person on their parents’ insurance.
- √ **Flexible:** Auto-enrollment into SPA for Medicaid applicants who are ineligible for full benefits.

ICAN! provided behind-the-scenes subject matter expertise and persistently advocated for the most comprehensive family planning SPA. We shared examples of SPAs from other states with state Medicaid and drafted sample language. We solicited input from community members to ensure the SPA inclusions reflected the needs and desires of eligible populations. We regularly participated in Medicaid Advisory Committee meetings and scheduled regular touchpoints with state Medicaid throughout the development and adoption process.

Finally, we worked with state legislators to pass a bill calling on state Medicaid to adopt a Family Planning State Amendment.

*Advocacy efforts by the ICAN! team were instrumental to ensuring that Illinois' Family Planning SPA became one of the most generous and comprehensive programs of its kind. The ICAN! team has deep knowledge of CMS guidelines around eligibility and covered services, and they have been proactive about engaging with the HFS team as thought partners. When helpful, they readily surfaced relevant examples from similar programs in other states, informing the development of the HFS Family Planning Program. They were incredibly responsive whenever technical questions arose, and played a key role in ensuring the FP SPA was developed in a timely manner.*

- Illinois Department of Healthcare and Family Services

## FROM ON-THE-BOOKS TO ON-THE-GROUND: OVERSEEING IMPLEMENTATION

Illinois' Family Planning SPA is publicly known as the "HFS Family Planning Program"

**A person can apply as an individual if:**

- They're a resident of Illinois.
- They make \$3,600 a month or less before taxes.
- They don't already have state or federally funded insurance such as Medicaid.

**Coverage is open to:**

- People of all genders and ages.
- People with other private insurance that doesn't cover birth control, has high out-of-pocket costs, or with confidentiality concerns.
- Non-citizens (through immediate, temporary coverage known as Family Planning Presumptive Eligibility or "FPPE").

ICAN! has engaged in three intersecting strategies to translate the on-the-books SPA into on-the-ground coverage.

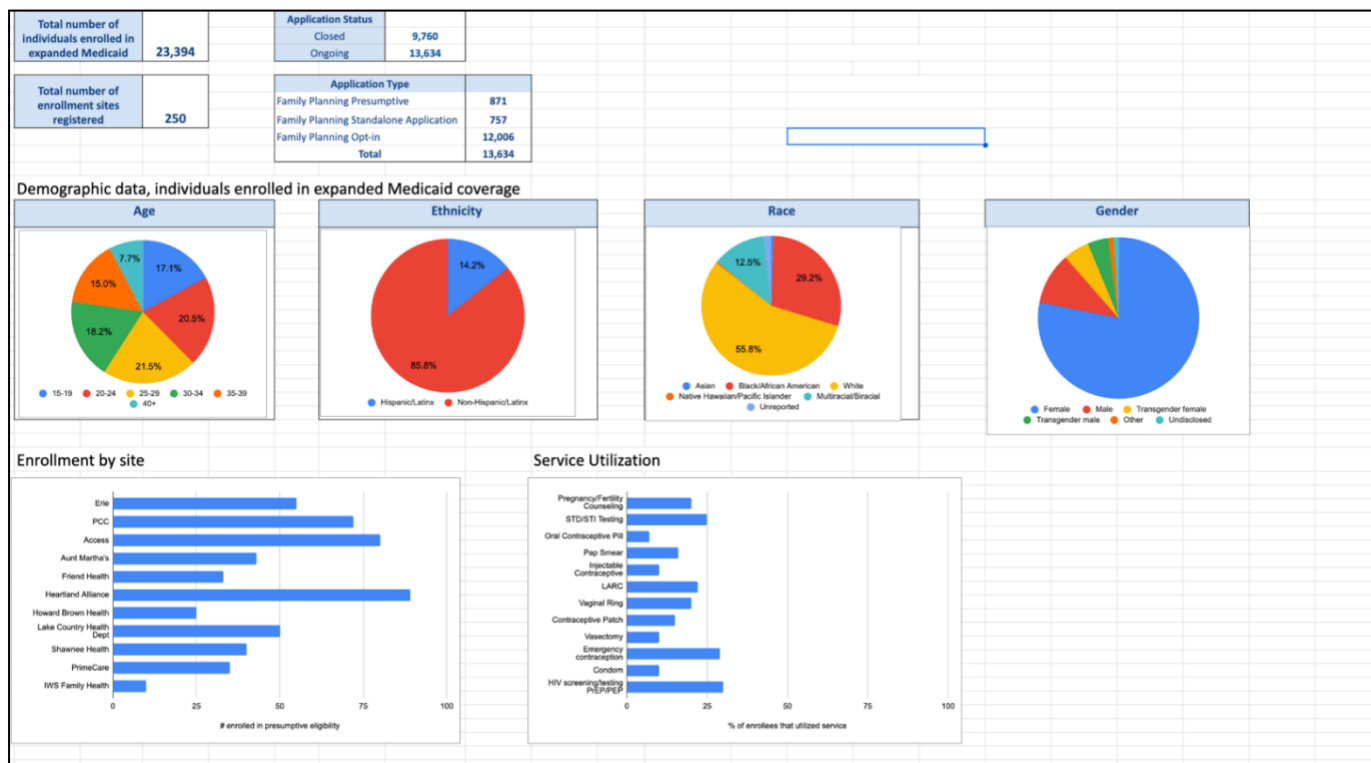
- 1) PROVIDE SUBJECT MATTER EXPERTISE for state agencies to optimize policies, plan for implementation, and provide accountability through data collection and benchmarking.

Since the SPA went into effect at the beginning of 2023, ICAN! has helped to diagnose and address operational challenges in enrollment. We have deployed ICAN! Community Advisory Board members to conduct patient simulations to identify barriers to obtaining HFS Family Planning Program coverage and have worked closely with safety-net health centers throughout the state to troubleshoot implementation challenges as they emerge. For example, when we found that people attempting to enroll in Family Planning Presumptive Eligibility for a second time in a calendar year were being unfairly denied, we immediately surfaced the issue with our contacts at state Medicaid. They were able to swiftly address the problem by issuing clarifying guidance for enrollment staff.

ICAN! has also continued to strengthen the policy as necessary. For example, we are advocating that state Medicaid adopt auto enrollment from postpartum coverage into the HFS Family Planning Program and that ongoing SPA benefits be extended to undocumented individuals. We have also worked to expand the scope of family planning related services covered under the SPA by recommending additional codes and missing procedures common in the scope of optimizing reproductive well-being.

ICAN! has also developed a Family Planning SPA implementation dashboard (*Figure 1*) for HFS to populate monthly. The data visualizations allow for ease of reporting to the Medicaid Advisory Committee, Governor's office, public health department, policymakers and other key stakeholders.

Figure 1. HFS Family Planning Program Implementation Dashboard



*The ICAN! team have been tremendous partners to HFS as we work to implement the new HFS Family Planning Program. ICAN!'s outreach to providers across the state has ensured that hundreds of provider sites have registered as Family Planning Presumptive Eligibility providers within the first year of our roll out. Their ongoing outreach, training, and technical assistance offerings have been critical to raising the awareness of this expansive new program among health and social service providers throughout Illinois. In addition, ICAN! is leading the efforts statewide to reach people newly eligible for coverage through a robust public education campaign informed by community voices.*

- Illinois Department of Healthcare and Family Services

2) PATIENT/PUBLIC ENGAGEMENT to raise awareness of new benefits with reproductive justice aligned messaging.

When the SPA took effect at beginning of 2023, ICAN! launched a statewide, multichannel public awareness campaign that has included:

- The development of digital tools and website content to help healthcare seekers determine their coverage eligibility and get their questions answered. Specifically, ICAN! developed a consumer-



facing HFS Family Planning Program landing page that simplifies the complexities of healthcare coverage and includes: consumer FAQs, a directory of Illinois enrollment sites, an eligibility quiz, and a live chat function.

- Targeted digital marketing across social media platforms as well as organic content on ICAN! channels. Through a partnership with the Chicago Department of Public Health, ICAN!'s messaging on the HFS Family Planning Program has been seen on busses, trains, and billboards. This partnership serves an example of how public health departments can make meaningful contributions to contraceptive care policy implementation efforts.
- Print assets for patients distributed to health centers and community-based organizations available in the 7 most frequently spoken languages among safety-net health center patients: English, Spanish, Arabic, Urdu, French, Polish, and Simplified Chinese.

Figure 2. Bus Shelter Ad



Figure 3. Patient-facing resources and marketing assets

- 3) PROVIDER TRAINING AND TECHNICAL ASSISTANCE to ensure that providers on-the-ground have the knowledge, skills, operational infrastructure, and resources to integrate new policies into practice.
- By conducting proactive and consistent outreach to qualified safety-net providers, ICAN! helped them become Family Planning Presumptive Eligibility (FPPE) sites, resulting in more than 80% of qualified providers registering to enroll patients.
  - ICAN! has developed [a suite of 20+ trainings and resources](#) for specific provider audiences, including postpartum home visitors, family case managers, early childhood providers, enrollment assisters, community health workers, and healthcare providers at safety net health centers.
  - ICAN! has partnered closely with our state’s Primary Care Association, Department of Human Services, Perinatal Quality Collaborative (PQC) and public health departments to distribute and co-facilitate live trainings. We’ve also partnered with Title V grantees, Title X grantees, Ryan White grantees, immigrant-serving organizations, school districts, and local community-based organizations to ensure all providers working with people of reproductive age have the information and support necessary to connect people to coverage and care. These efforts have resulted in more than 1,200 community health and social service providers trained to enroll patients in this coverage.

*I didn't realize how awesome the program was going to be for our patients. I recently helped a lady losing her Medicaid coverage who was freaking out about how she was going to pay 200 for her Depo shot. When I told her we could enroll her in [the HFS Family Planning Program] and she would pay no cost she couldn't stop telling me how great this was.*

– Enrollment Manager,  
Shawnee Health

*We did our first FPPE enrollment on February 22nd. The patient came in and we were able to enroll her to get her Nexplanon covered that day, and it was a huge relief for her that she did not have to leave with a \$1,300 out of pocket bill. It was also great because her partner was with her and asked if he could qualify for this program. The women's health team is now routinely reaching out asking us to help enroll their patients who need coverage.*

– Community Engagement Manager,  
Heartland Health Services of Illinois

*This information was very informative! Thank you for the training and resources!*

- Child and Family Benefit Coordinator, Chicago Public Schools

Figure 4. Example provider training and TA materials



**IMPACT TO DATE**

ICAN! relies on a mix of process and impact indicators to evaluate the success of our efforts to implement a robust and inclusive Family Planning State Plan Amendment.

**Process:**

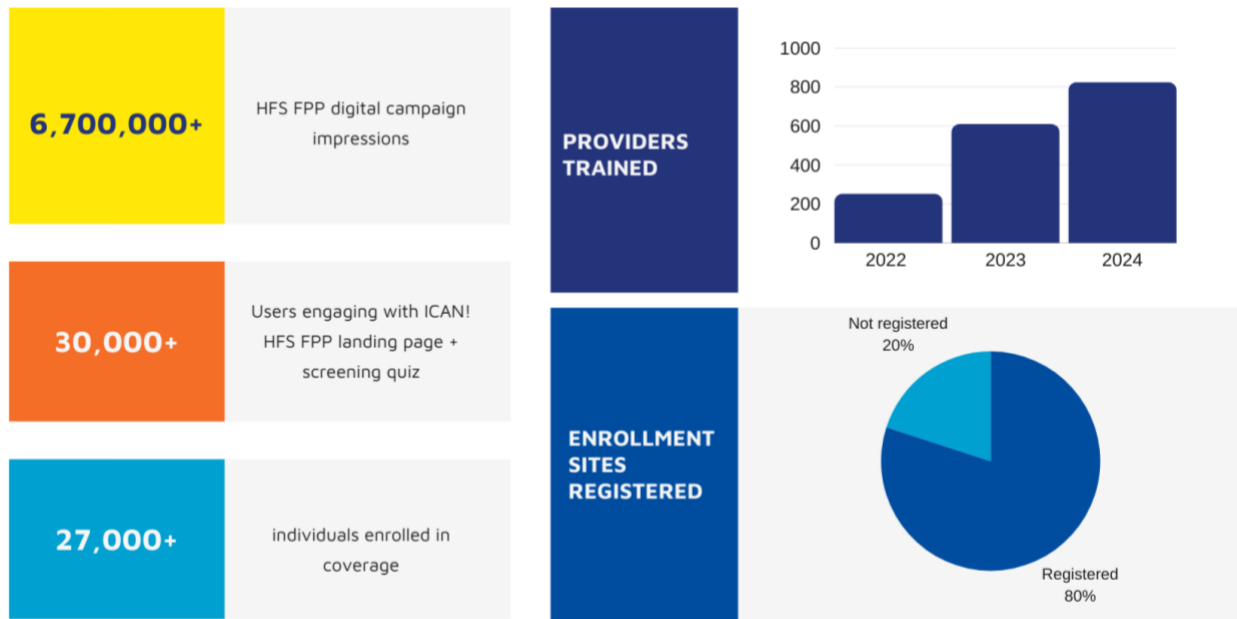
- Number of health centers that have registered to enroll patients in presumptive eligibility.
- Number of staff trained to screen and enroll patients in coverage.
- Digital engagement with patient-facing tools and information.

**Impact:**

- Number of patients enrolled in coverage.
- Number of patients using coverage to access care.
- Qualitative data such as provider and patient testimonials describing the impact this coverage has on care quality and on patients’ ability to get the care they need when they need it.



Figure 5. SPA implementation dashboard as of August 2024



We have been encouraged by this early success and how much interest it has sparked from advocates and agency leads in other states, and believe this data indicates how the behind-the-scenes subject matter expertise, cross-sector collaboration, provider training and technical assistance, and public engagement activities facilitated by ICAN! have been essential to:

- Raising general awareness of and demand for the benefits program among both providers and patients.
- Operationalizing billing, coding, and enrollment procedures at the health center level.
- Enrolling eligible patient populations through partnerships across the sexual, reproductive, and maternal health and social service spectrum.
- Holding state Medicaid accountable to patient enrollment and utilization goals.

Perhaps most importantly, ICAN!'s work in Illinois has raised the profile of state Medicaid Family Planning Program implementation as a strategy to meet people's immediate sexual and reproductive health needs while providing a robust and predictable funding for community health centers.