



Alaska Native Health Board

THE VOICE OF ALASKA TRIBAL HEALTH SINCE 1968

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ALASKA NATIVE TRIBAL
HEALTH CONSORTIUM

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HEALTH CORPORATION

CHICKALOON VILLAGE
TRADITIONAL COUNCIL

CHUGACHMIUT

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TRIBAL GOVERNMENTS

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TRIBAL CONSORTIUM

NATIVE VILLAGE
OF EKLUTNA

NATIVE VILLAGE OF EYAK

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TRADITIONAL COUNCIL

NORTON SOUND
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TANANA CHIEFS CONFERENCE

YAKUTAT TLINGIT TRIBE

YUKON-KUSKOKWIM
HEALTH CORPORATION

VALDEZ NATIVE TRIBE

May 17, 2023

Emily Beaulieu
Medicaid State Plan Coordinator
Alaska Department of Health
3601 C Street, Suite 902
Anchorage, AK 99503

RE: Proposed Temporary Medicaid State Plan Amendment to Suspend PA and SA for Behavioral Health State Plan Services

Dear Ms. Beaulieu,

The Alaska Native Health Board (ANHB)¹ writes to provide comment on the proposed temporary Medicaid state plan amendment (SPA) to suspend prior (PA) and service authorizations (SA) for behavioral health state plan services. We welcome and are supportive of the proposed temporary SPA to suspend PAs and SAs for behavioral health services. This would continue a flexibility the State utilized during the COVID-19 pandemic under an 1135 Waiver authority.

The current draft of the SPA, however, only makes this a temporary change to the State Plan for these outpatient services. We recommend that this change be made permanent. The State has the authority now to adopt this change permanently, and it creates duplicative work to adopt a temporary change and then complete a permanent SPA next year.

Further, we recommend that this suspension of PAs and SAs be extended to 1115 Waiver services. We understand that the State has proposed the end of PAs and SAs for 1115 Waiver services as part of its recently proposed regulatory package on 1115 Waiver services. This regulatory package does not go through Tribal Consultation, and we wanted to share our recommendation in through this consultation. We also plan to submit comments during the public comment period.

Finally, we urge the Department to put out clarification on when and how SAs and PAs will resume for 1115 Waiver services and explain the pause for state plan services. Because the proposed regulations for 1115 Waiver services will not be effective before the end of the Public Health Emergency, it is important for the Department and Division of Behavioral Health to clearly articulate its intention for

¹ ANHB was established in 1968 with the purpose of promoting the spiritual, physical, mental, social, and cultural well-being and pride of Alaska Native people. ANHB is the statewide voice on Alaska Native health issues and is the advocacy organization for the Alaska Tribal Health System (ATHS), which is comprised of tribal health programs that serve all of the 229 Tribes and 180,000 Alaska Native and American Indian people throughout the state. As the statewide tribal health advocacy organization, ANHB helps Alaska's Tribes and Tribal programs achieve effective consultation and communication with state and federal agencies on matters of concern.

providers working with beneficiaries and preparing for the increased administrative burden of PAs and SAs upon resumption.

We thank the Department for the opportunity to engage in this government-to-government Tribal Consultation. If you have any comments or questions regarding our recommendations, you may contact ANHB by email at anhb@anhb.org or by telephone at (907) 729-7510.

Sincerely,

A handwritten signature in black ink, appearing to read "W F Smith". The signature is fluid and cursive, with the first name "W" and last name "Smith" being more prominent than the middle initial "F".

Chief William F. Smith, Chairman
Alaska Native Health Board
Tribally-Elected Leader of the Valdez Native Tribe