



Comment Closure Date - October 27, 2017

Comments received:

- ✦ Southcentral Foundation
- ✦ Alaska Native Health Board (concurring with SCF comments)

Recommended modifications to SPA:

1. Expressly cover the services for treatment of other conditions, in addition to Autism Spectrum Disorder, for which there is evidence the services are effective;
2. Provide that, for services furnished to homeless individuals or within the “four walls” of a community behavioral health center operated by a tribal organization, the services will be reimbursed at the tribal behavioral health encounter rate; and
3. Remove the prior authorization requirement.

Coverage of other conditions:

While the state considered the suggestion to modify the draft SPA – attachment 4.19-B page 1.2 – to articulate an extension of reimbursement for behavior analysis services provided to those EPSDT eligible individuals experiencing conditions other than autism, it determined that without changes, the proposed language allows for such an expansion if authorized in regulation. This determination provides the tribally desired flexibility without expressly binding the state to an expansion of the conditions for which reimbursement of behavior analysis services occurs.

Four-wall inclusion for homeless individuals

The “*four-wall provision*” applies to the restriction on reimbursement for clinic services provided outside of the four walls of the clinic. The services provided by the licensed behavior analyst are not clinic services and are eligible for Medicaid reimbursement when provided in any appropriate setting.

Prior authorization removal

The state concurs with the issues raised by the tribes regarding prior-authorization. As a result, the state removed the reference to prior authorization from attached sheet to attachment 3.1-A page 2. This change to the SPA facilitates flexibility in service provision and avoids increasing the administrative burden on provider entities.