

Compilation of Tribal Comments on Behavior Health Provider SPA

Number	Source	Comment	State Response
1	Multiple	(ANTHC and ANHB) Thanks the state for postponing the implementation of SBIRT and requests that the state revise the proposed SPA - or submit a companion SPA - adding licensed clinical social workers and psychologists as billing providers in tribal clinics for tribal clinic services. Further, that these providers be able to provide care, document, and bill under tribal clinic standards.	As stated during the July 17, 2019, in-person consultation meeting, the state must perform a fiscal analysis of this proposal before engaging in dialogue regarding the addition of licensed clinical social workers and psychologists under tribal clinic services.
2	Multiple	(ANTHC and ANHB) Assert that the addition of LCSWs and psychologists was an "agreed upon item" during a 2016 Medicaid reform meeting between the State and THOs. Further that the consensus during the meetings was that adding these providers to tribal clinics would facilitate early intervention.	Please see response above.