

Alaska Native Health Board

THE VOICE OF ALASKA TRIBAL HEALTH SINCE 1968

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June 3, 2020

Courtney O'Byrne King,
State Plan Coordinator and Legislative Liaison
Division of Health Care Services,
Alaska Department of Health & Social Services,
4501 Business Park Blvd., Building L,
Anchorage, AK 99503

RE: Alaska Medicaid Disaster Relief State Plan Amendment for Tests Ordered by
Licensed Practitioners Tribal Consultation

Dear Ms. King,

The Alaska Native Health Board (ANHB)¹ thanks the Department of Health & Social Services (the Department) for the opportunity to submit written comments for Tribal Consultation on the Disaster Relief State Plan Amendment (DR-SPA or SPA) to allow for

- licensed practitioners operating within their scope of practice to order laboratory and radiology services;
- coverage of laboratory services provided outside an office, or similar facility other than a hospital outpatient department or clinic, when meeting the state's provider qualifications;
- reimbursement of laboratory services ordered by licensed practitioners operating within their scope of practice;
- licensed practitioners operating within their scope of practice to order home health services.

We are supportive of these provisions for all non-physician practitioners, including Community Health Aide Practitioners (CHA/Ps), acting within their scope of practice to order laboratory and radiology services.

Noting that the DR-SPA will only be in effect through the end of the Public Health Emergency, we also support that these provisions be adopted through the regular Medicaid State Plan Amendment process. As you know, non-physician practitioners are an important link in the delivery of care in the Alaska Tribal Health System and in the larger Alaska health care system. Allowing licensed non-physician practitioners to order laboratory and radiological services, acting within their scope of practice, enhances the effective delivery of care at all times, and not only during a global pandemic.

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 over 177,000 Alaska Natives and American Indians (AN/AI) 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 mutual concern.

ALASKA NATIVE TRIBAL
HEALTH CONSORTIUM

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ISLANDS ASSOCIATION

ARCTIC SLOPE
NATIVE ASSOCIATION

BRISTOL BAY AREA
HEALTH CORPORATION

CHICKALOON VILLAGE
TRADITIONAL COUNCIL

CHUGACHMIUT

COPPER RIVER
NATIVE ASSOCIATION

COUNCIL OF ATHABASCAN
TRIBAL GOVERNMENTS

EASTERN ALEUTIAN TRIBES

KARLUK IRA
TRIBAL COUNCIL

KENAITZE INDIAN TRIBE

KETCHIKAN
INDIAN COMMUNITY

KODIAK AREA
NATIVE ASSOCIATION

MANIILAQ ASSOCIATION

METLAKATLA INDIAN
COMMUNITY

MT. SANFORD
TRIBAL CONSORTIUM

NATIVE VILLAGE
OF EKLUINA

NATIVE VILLAGE OF EYAK

NATIVE VILLAGE
OF TYONEK

NINILCHIK
TRADITIONAL COUNCIL

NORTON SOUND
HEALTH CORPORATION

SELDOVIA VILLAGE TRIBE

SOUTHCENTRAL
FOUNDATION

SOUTHEAST ALASKA REGIONAL
HEALTH CONSORTIUM

TANANA CHIEFS CONFERENCE

YAKUTAT TLINGIT TRIBE

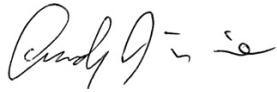
YUKON-KUSKOKWIM
HEALTH CORPORATION

VALDEZ NATIVE TRIBE

We thank the Department for adopting this important provision to assure the delivery of care during this time of COVID-19 pandemic, and we look forward to working with the Department to make the provisions permanent through the regular Medicaid SPA process.

Should you have any questions concerning them or this letter, please contact the ANHB at (907) 562-6006, or email anhb@anhb.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Jimmie". The signature is written in a cursive style with a large initial "A" and a long horizontal stroke at the end.

Andrew Jimmie, Tribally-Elected Leader of the Village of Minto
Chairman
Alaska Native Health Board