



# Alaska Native Health Board

THE VOICE OF ALASKA TRIBAL HEALTH SINCE 1968

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September 18, 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: Medicaid State Plan Amendment for Tests Ordered by Licensed Practitioners – Tribal Consultation

Dear Ms. King,

The Alaska Native Health Board (ANHB)<sup>1</sup> thanks the Department of Health & Social Services (the Department) for the opportunity to submit written comments for Tribal Consultation on the State Plan Amendment (SPA) to add “licensed practitioners operating within their scope of practice”, in addition to physicians, as eligible to order laboratory and radiology services under Medicaid.

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. 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.

We thank the Department for this important proposed provision to assure the delivery of care in the most efficient and cost-effective manner. Should you have any questions concerning them or this letter, please contact the ANHB at (907) 562-6006, or email [anhb@anhb.org](mailto:anhb@anhb.org).

Sincerely,

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

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<sup>1</sup> 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 Native and American Indian (AN/AI) 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.

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  
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MANILAQ ASSOCIATION

METLAKATLA INDIAN  
COMMUNITY

MT. SANFORD  
TRIBAL CONSORTIUM

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OF EKUTNA

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