



# Alaska Native Health Board

THE VOICE OF ALASKA TRIBAL HEALTH SINCE 1968

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ALASKA NATIVE TRIBAL  
HEALTH CONSORTIUM

ALEUTIAN PRIBILOF  
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

MANILLAQ ASSOCIATION

METLAKATLA INDIAN  
COMMUNITY

MT. SANFORD  
TRIBAL CONSORTIUM

NATIVE VILLAGE  
OF EKLUKNA

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

January 18, 2022

Courtney O'Byrne King  
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Alaska Department of Health & Social Services  
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Anchorage, AK 99503  
Via Email: [Courtney.King@alaska.gov](mailto:Courtney.King@alaska.gov)

RE: Inpatient Psychiatric Services for Individuals Under 21 Years of Age

The Alaska Native Health Board (ANHB)<sup>1</sup> provides these comments in the Tribal Consultation process on the proposed Medicaid State Plan Amendment (SPA) that would amend the effective date attached to the reimbursement rates for Inpatient Psychiatric Services for individuals under 21 years of age. We thank the Department for the opportunity to comment on this proposed SPA.

ANHB is generally supportive of this proposed SPA and the associated regulatory rate changes. The new rates will help meet the cost of care. We do continue to have a concern, however, that the changes do not go far enough, particularly for the transitions of care rate. Currently, the transitions of care rate is \$211 which does not meet the cost to deliver care on transition of care days. We recommend that the Department consider a new rate for transitions of care which better meets the cost of the delivery of care on these days of transition. The Department could, for example, set the reimbursement for transitions of care to 85% of the daily rate for the level of care provided to the beneficiary. Using a percentage not only better matches the cost of care, but it also adjusts with the level of care being delivered.

ANHB further recommends that the Department consider implementing a regional adjustment for these rates, similar to the regional adjustments used by the Division of Senior and Disability Services for Home- and Community-Based Waiver services, as a means of making the service financially viable for rural and remote providers. Regional adjustments allow reimbursements to better meet the cost of delivering these services in rural locations where costs of care are significantly higher, and can work to make services more readily available by increasing the sustainability of services.

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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 people throughout the state. The ATHS administers clinical and public health programs for AI/AN people throughout the state of Alaska. As the statewide tribal health advocacy organization, ANHB supports Alaska's Tribes and Tribal programs achieve effective consultation and communication with state and federal agencies on matters of concern.

We again thank the Department for this opportunity to provide these comments. We believe these proposed changes are positive, and we encourage the Department to take further steps to make these services more sustainable in rural Alaska. If you have any comments or questions regarding our recommendations, you can contact ANHB at [anhb@anhb.org](mailto:anhb@anhb.org) or via telephone at (907) 729-7510.

Duk'idli (Respectfully),

A handwritten signature in black ink, appearing to read "Diana Zirul". The signature is fluid and cursive, with a large initial "D" and "Z".

Diana L. Zirul  
Chair, Alaska Native Health Board  
Tribally-Elected Leader of the Kenaitze Tribal Council