



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

MANILAQ 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

November 7, 2022

Courtney O'Byrne King
Medicaid State Plan Coordinator
Alaska Department of Health
3601 C Street, Suite 902
Anchorage, Alaska 99503
Via Email: courtney.king@alaska.gov

RE: Disaster Relief SPA Temporary Enhanced Pharmacy Dispensing Fee Extension

Dear Ms. King,

The Alaska Native Health Board (ANHB)¹ writes to comment on the proposed temporary extension of the Medicaid Disaster Relief State Plan Amendment (DR SPA) on enhanced Pharmacy Dispensing Fees. We are supportive of this proposed SPA as a measure to ensure there is not a roll back of current pharmacy dispensing fee levels between when the Federal COVID-19 Public Health Emergency (PHE) ends and when permanent Medicaid Pharmacy Dispensing Fee increases tied to the 2019 Medicaid Pharmacy Dispensing Fee Survey can be implemented.

There is an urgent need to adopt a new permanent Medicaid Pharmacy Dispensing Fee, including a Tribal-specific fee structure which recognizes the increased dispensing fee costs Tribal pharmacies face serving our remote, off the road system communities. We appreciate the work the Department is doing to extend the temporary enhanced Medicaid Pharmacy dispensing, but this process should not be used to delay the adoption of a permanent Medicaid Tribal Pharmacy Dispensing Fee.

Tribal health organizations have put on hold millions of dollars of pharmacy dispensing fee reimbursements due to the inordinate delay in adopting a permanent Medicaid Tribal Pharmacy Dispensing Fee. This loss of revenue only stands to increase by the millions over the next year if a permanent Medicaid Tribal Pharmacy Dispensing Fee is not adopted swiftly. While we understand the constraints of responding to the COVID-19 pandemic which initially delayed the adoption of new permanent Medicaid Pharmacy Dispensing Fees based on the 2019 Medicaid Pharmacy Dispensing Fee Survey, we are now several years into the process with no new rate in place. Without a new permanent set of Medicaid Pharmacy Dispensing Fees, inflation and cost strains will continue to impact the delivery of pharmacy services by constraining our ability to bring on and retain staff.

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 for the Alaska Tribal Health System, which is comprised of Tribal health programs that serve all 229 Tribes and over 180,000 Alaska Native and American Indian people throughout the state. As the statewide tribal health organization, ANHB supports Alaska's Tribes and Tribal health programs achieve effective consultation and communication with state and federal agencies on matters of concern.

Further, the DR SPA includes a provision to allow for a 68-day supply flexibility for medications for beneficiaries. We concur with the Department's decision not propose to extend the 68-day supply flexibility as part of this temporary extension. We do, however, recommend the Department adopt an expanded medications list which will be eligible for 90-day supply as part of any permanent package of changes for Medicaid pharmacy.

Should you have any comments or questions regarding our recommendations, please contact ANHB at (907) 729-7510 or via e-mail at anhb@anhb.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Jimmie". The signature is fluid and cursive, with a small flourish at the end.

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