



Alaska Native Health Board

THE VOICE OF ALASKA TRIBAL HEALTH SINCE 1968

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December 9, 2022

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

Re: Proposed SPA on Rebasing of Medicaid Payment Rates for Home and Community Based Services

The Alaska Native Health Board (ANHB)¹ writes to provide comment on the proposed rate rebasing Medicaid State Plan Amendment for long term care services and supports. To begin, we highly appreciate the hard and detailed work the Department has put into creating the proposed rebasing. We also appreciate the increases included in the proposed new rates—the lack of rebasing over the last two cycles has created a situation in which inflationary adjustments have not kept rates up to the level needed for reasonable access to quality care. Overall, these adjusted rates are a much-needed step in the right direction. Unfortunately, we are concerned that the proposed rate increases do not go far enough.

Over the last few years, the Alaska Tribal Health System (ATHS) has seen significant turnover in both the Direct Service Profession and Care Coordination fields. For the ATHS to recover the workforce needed to provide access to care for the patient population, providers need to be able to make competitive compensation offers. The current rates are simply too low for that, and the proposed increases are not enough to make up the gap. It is imperative that cost-based methodologies for setting rates be based on real-world costs. Therefore, the Department should not be making modeling assumptions based on 40-hour work weeks or caseloads that do not reflect the realities experienced by providers in the current workforce. Rates should also be calculated on the entire cost of providing care in the current economic climate, including full consideration of administrative, travel, fringe, and wage costs. Further, considering the two missed rebasing cycles, the 5% stop-loss requirement should not be invoked to block rates from being raised to a level that will support access to care.

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.

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CHUGACHMIUT

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SOUTHEAST ALASKA REGIONAL
HEALTH CONSORTIUM

TANANA CHIEFS CONFERENCE

YAKUTAT TLINGIT TRIBE

YUKON-KUSKOKWIM
HEALTH CORPORATION

VALDEZ NATIVE TRIBE

In addition, the proposed rates are not sufficient to provide compensation commensurate with the level of care needed by the communities we serve, which are aging rapidly and experiencing higher levels of acuity. Individuals who receive Home and Community Based Services (HCBS) through the ATHS often have serious health issues that require frequent hospitalizations and necessitate Personal Care Services, Adult day or rehabilitation services (performed by Direct Service Professionals), and specialized transportation. There are not enough skilled nursing facilities available to meet the needs of these individuals. Care Coordinators therefore spend more time working these cases than is assumed in the rate-setting methodology. The Department should work with providers to develop an easy-to-access acuity rate that allows Care Coordinators to be reimbursed commensurate with the level of care needed in these situations.

Finally, we urge the Department to engage in a dialogue with ANHB and other Tribal stakeholders regarding the possibility of developing Alternative Payment Methodologies for the services covered by the proposed changes.

Thank you again for the Department's time and effort in developing the proposed rebasing. Should the Department have any comments, questions, or clarifications on our written comments, please contact ANHB at anhb@anhb.org or via telephone at (907) 729-7510.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Jimmie".

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