



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

MANIILAQ ASSOCIATION

METLAKATLA INDIAN
COMMUNITY

MT. SANFORD
TRIBAL CONSORTIUM

NATIVE VILLAGE
OF EKLUTNA

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

February 26, 2024

Emily Beaulieu, State Plan Amendment Coordinator
Alaska Department of Health, Office of the Commissioner
3601 C Street, Suite 902
Anchorage, AK 99503
via email: emily.beaulieu@alaska.gov

RE: Proposed State Plan Amendment – All-Inclusive Rate

Dear Ms. Beaulieu,

The Alaska Native Health Board (ANHB)¹ writes to provide comment on the proposed state plan amendment (SPA) to add the current process of implementing updated inpatient and outpatient hospital per diem rates (All-Inclusive Rates) published by the Indian Health Service (IHS) in the Federal Register (FR). The Alaska Tribal Health System is supportive of this SPA and appreciates the State's efforts to provide additional clarity to the department's process of updating payments and the effective date when IHS makes updates to the FR and ensuring Tribes and Tribal Health Organizations (T/THOs) are reimbursed at the most current rate.

ANHB supports this proposed amendment to add language in section 4.19-C. Reimbursing providers the difference between new and old rates retrospectively if the rates are published after the IHS effective date and the new rate is higher than the previous rate will ensure T/THOs are reimbursed at the most equitable rate for the services provided. Implementing the rate prospectively when a new published rate is below the previous rate supports T/THOs and avoids unpredictable financial consequences.

Thank you for the opportunity to provide to provide comment during this Tribal Consultation on the All-Inclusive Rates SPA. If you have any comments or questions regarding our letter, please contact the Alaska Native Health Board by phone at (907) 729-7510 or by e-mail at anhb@anhb.org.

Sincerely,

Chief William F. Smith, Chairman
Alaska Native Health Board
Tribally-Elected Leader of the Valdez Native Tribe

¹ Established in 1968, ANHB's mission is to promote 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 Tribes/Tribal Health Organizations that serve all 229 Tribes and over 188,000 Alaska Native and American Indian people throughout the Alaska. As the statewide advocacy organization, ANHB supports achieving effective consultation and communication with state and federal agencies on matters of concern.