

#### **Vision**

A Native Community that enjoys physical, mental, emotional and spiritual wellness.

### Mission

Working together with the Native Community to achieve wellness through health and related services.

## **Customer-Owners**

Serving over 65,000 Alaska Native and American Indian People

#### **Communities Served**

Anchorage Service Unit and 55 Tribes to Include: Matanuska-Anchorage Chickaloon Susitna Borough Eklutna McGrath Igiugig Newhalen Iliamna Ninilchik Kenaitze Seldovia Knik St. Paul Island Kokhanok Tyonek

# Services Offered Over 90 Community-Based

Programs Including:
Medical
Behavioral
Dental

Co-Own and Co-Manage the Alaska Native Medical Center

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March 17, 2023

Emily Beaulieu Medicaid State Plan Coordinator Alaska Department of Health 3601 C Street, Suite 902 Anchorage, AK 99503

RE: Proposed Temporary Medicaid State Plan Amendment to Suspend PA and SA for Behavioral Health State Plan Services

Dear Ms. Beaulieu,

Southcentral Foundation (SCF) provides the followings comments on the proposed temporary Medicaid state plan amendment (SPA) to suspend prior authorizations (PA) and service authorizations (SA) for behavioral health state plan services. This proposed temporary SPA to suspend PAs and SAs for behavioral health services will provide welcome relief for SCF's behavioral health providers and administration. It will continue a flexibility utilized during the pandemic that has brought a beneficial reduction in provider documentation burden and organizational administrative burden.

Additionally, this suspension of PAs and SAs should be extended to 1115 Waiver services. While the state has promulgated regulations to do away with many service limits and some service authorizations, these regulations will not be in effect for some time and the additional burden on 1115 service providers is high. SCF will submit comments on these regulations but wanted to make clear concerns about the burden 1115 PAs and SAs will have on providers and organizations.

Thank you for your consideration of these comments. If you have any questions, please contact SCF's Executive Vice President of Behavioral Services Michelle Baker at mbaker@southcentralfoundation.com.

Sincerely,

SOUTHCENTRAL FOUNDATION

April Kyle, MBA
President and CEO