



TANANA CHIEFS CONFERENCE

Health Services

Al Ketzler, Sr. Building

201 First Ave, Suite 300

Fairbanks, AK 99701

(907) 452-8251 Fax: 459-3950

Toll Free in Alaska 1-800-478-7822

May 17, 2023

Transmitted by email

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,

Tanana Chiefs Conference writes to provide comment on the proposed temporary Medicaid state plan amendment (SPA) to suspend prior (PA) and service authorizations (SA) for behavioral health state plan services. We welcome and are supportive of the proposed temporary SPA to suspend PAs and SAs for behavioral health services. Although we recommend this change be made permanent, even a temporary suspension would continue a much needed flexibility the State utilized during the COVID-19 pandemic under an 1135 Waiver authority.

Tanana Chiefs Conference (TCC) is organized as Dena' Nena' Henash or "Our Land Speaks"; an Alaska Native non-profit organization, charged with advancing Tribal self-determination and enhancing regional Native unity. We work toward meeting the health and social service needs of Tribal members and beneficiaries throughout our region. TCC constitutes a tribal consortium made up of 42 members – including 39 villages, spread over 235,000 square miles of Interior Alaska, and a service population of about 19,000 people. TCC works under the leadership and guidance of our Full Board of Directors, Executive Board, Health Board, and Traditional Chiefs.

As mentioned above, we recommend that this proposed temporary change be made permanent. The State has the authority to adopt this change permanently, and it creates duplicative work to adopt a temporary change and then complete a permanent SPA next year. Additionally, we recommend that this suspension of PAs and SAs be extended to 1115 Waiver services. We understand that the State has proposed the end of PAs and SAs for 1115 Waiver services as part of its recently proposed regulatory package on 1115 Waiver services. This regulatory package does not go through Tribal Consultation, and we wanted to share our recommendation in through this consultation. We also plan to submit comments during the public comment period.

Finally, we urge the Department to put out clarification on when and how SAs and PAs will resume for 1115 Waiver services and explain the pause for state plan services. Because the proposed regulations for 1115 Waiver services will not be effective before the end of the Public Health Emergency, it is important for the Department

Our Vision

Healthy People Across Generations

Our Mission

TCC Health Services, in partnership with those we serve, promotes and enhances spiritual, physical, mental and emotional wellness through education, prevention and the delivery of quality services.

and Division of Behavioral Health to clearly articulate its intention for providers working with beneficiaries and preparing for the increased administrative burden of PAs and SAs upon resumption.

We thank the Department for the opportunity to engage in this government-to-government Tribal Consultation. If you have any comments or questions regarding our recommendations, please contact me at 907-687-3449 or at Jacoline.bergstrom@tananachiefs.org

Sincerely,

Jacoline Bergstrom

Jacoline Bergstrom, Executive Director Health Services
Tanana Chiefs Conference