



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Health

OFFICE OF THE COMMISSIONER

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March 31, 2025

Re: Behavioral Health SA Removal SPA

Dear Tribal Health Leaders

On behalf of the Department of Health (the department) and in keeping with the responsibility to conduct tribal consultation, I am writing to inform you of a proposed future Medicaid state plan amendment (SPA). This opportunity for consultation runs concurrently with public comment on proposed regulations.

Purpose and content of the proposed amendment:

This SPA will update the state plan to reflect the removal of service authorization (SA) requirements for specific behavioral health services. This will be conducted via changes to Attached Sheet to Attachment 3.1-A, page 3, 3.1, 4.4, 4c, 6, 7, and 9; Supplement 1 to Attachment 3.1-A, pages 1, 1a, and 2; Supplement 2 to Attachment 3.1-A, pages 2 - 5; and an alignment SPA to the Alternative Benefit Plan, Section 3.1 – Attachment L, page 31.

This will remove the SA requirements for

- Services provided by community behavioral health service (CHBS) and mental health physician clinics
 - Behavioral health screenings
 - Intake assessments
 - Pharmacological management

This SPA will also update the limitations of Medication Assisted Treatment (MAT), provide clarification of date for applicability of MAT coverage, and removes the requirement that CHBS providers be a grantee of the Division of Behavioral Health. The SPA will also address updates to case management for behavioral health services that are already operational.

Anticipated impact on Medicaid-eligible Alaska Native/American Indian (AN/AI) beneficiaries:

The removal of service authorization requirements for behavioral health services is intended to strengthen access to mental health and substance use disorder (SUD) services for Medicaid-eligible

AN/AI beneficiaries. By eliminating prior authorization for behavioral health screenings, intake assessments, pharmacological management, and services provided by community behavioral health providers and mental health physician clinics, this change will reduce administrative delays and allow beneficiaries to receive timely care.

Updates to the MAT and case management section are to bring the state plan into alignment with current operations.

Anticipated impact on tribal health programs and the Indian Health Service (IHS):

Tribal health organizations and the IHS play a critical role in delivering behavioral health services to AN/AI populations. The removal of prior authorization requirements will reduce administrative burdens on these providers.

By eliminating service authorization for the above services, tribal health programs will be able to expedite service delivery, particularly in rural and remote areas where delays in authorization processing can create barriers to care. This change is especially important for crisis situations or urgent behavioral health needs, where immediate access to assessment and treatment is necessary. The SPA aligns with the department's efforts to promote timely, patient-centered behavioral health care and is expected to contribute to better health outcomes across the state.

Mechanism and timeline for comment

Written comments or questions regarding the proposed amendment are due no later than the close of business, April 30, 2025. If seeking an in-person meeting regarding the proposed changes, please provide a written request within 15 days of the date of this letter.

Please direct all written correspondence to Christal Hays, Alaska Department of Health and Social Services, 3601 C Street, Suite 902, Anchorage, AK 99503, or christal.hays@alaska.gov.

*Comments received in response to this consultation letter are considered for consultation and not comment on the regulations. Comments on the regulations are not considered comments for consultation on the SPA. **You must do so separately if you wish to provide comments for consideration in both the SPA and the regulations processes.** To locate the regulations, please refer to the State of Alaska web page at the "[Public Notices](#)" link.*

Sincerely,

/s/

Christal Hays
Medicaid State Plan Coordinator

