



May 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,

Norton Sound Health Corporation 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. This would continue a flexibility the State utilized during the COVID-19 pandemic under an 1135 Waiver authority.

Norton Sound Health Corporation (NSHC) is a tribally owned and operated, independent, not-for profit healthcare organization, founded in 1970 to meet the health care needs of the Inupiat, Siberian Yup'ik and Yu'pik people of the Bering Strait region. NSHC is governed by a 22-member board of directors that represents all communities and areas of the Bering Strait region, a 44,000 square-mile section of northwestern Alaska.

The current draft of the SPA, however, only makes this a temporary change to the State Plan for these outpatient services. We recommend that this change be made permanent. The State has the authority now to adopt this change permanently, and it creates duplicative work to adopt a temporary change and then complete a permanent SPA next year.

Further, 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 and Division of Behavioral

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# NORTON SOUND HEALTH CORPORATION

*Providing quality health services and promoting wellness within our people and environment.*

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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, you may contact me at [agorn@nshcorp.org](mailto:agorn@nshcorp.org) or (907)-443-3286.

Sincerely,

  
Angie Gorn (May 17, 2023 12:09 AKDT)

Angie Gorn, President & CEO  
Norton Sound Health Corporation



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