



5/16/2023

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,

Tanana Chiefs Conference (TCC) writes to provide comment on the proposed temporary Medicaid state plan amendment (SPA) to extend the temporary COVID-19 Public Health Emergency enhanced pharmacy dispensing fee rates. We support the continuation of the pandemic-era enhanced pharmacy dispensing fee rate while we continue to discuss the 2019 Cost of Dispensing Fee Survey and the adoption of a new rate based on that data.

Tanana Chiefs Conference is an Alaska Native non-profit corporation, charged with advancing Tribal self-determination and enhancing regional Native unity. We represent 42 communities and 37 federally recognized tribes in our work toward meeting the health and social service needs of Tribal members and beneficiaries throughout our region.

TCC continues to emphasize the incredible impact of inflation and staffing costs on pharmacy providers, and how this is impacting the cost for providers to continue to provide services. By not implementing a permanent rate based on the 2019 Cost of Dispensing Fee Survey data, TCC has sustained negative financial impacts that ongoing delays exacerbate. These impacts equate to nearly half a million dollars annually for TCC which negatively impacts our ability to render the quality, quantity, and timeliness of care that we would hope to do. There is an urgency to resolving this ongoing dialogue, and although we support this proposed temporary SPA, we do not wish for it to be a mechanism to delay resolution.

Further, we thank the Department for providing clarity during our consultation meeting on what rates have been shared with the Centers for Medicare and Medicaid Services (CMS) for approval related to a more permanent Pharmacy Dispensing Fee Rate based on the 2019 Cost of Dispensing Fee Survey. We believe additional discussion on these rates is necessary, as they do not accurately reflect the costs for both, Tribal and non-Tribal providers, as currently proposed. Tribal data should not be used to set non-Tribal rates if that rate will not be used to reimburse Tribal programs.

We would urge a fair and equitable rate and process on pharmacy dispensing fees. Equitable rates do not always mean equal rates, particularly the costs we experience delivering services across the vast roadless expanses of the state where our beneficiaries live. CMS regulations require that States consider the unique circumstances and costs for Tribal providers when establishing their pharmacy dispensing fees so that they are adequately reimbursed for the provision of care to beneficiaries. The data in the Meyers and

---



---

Stauffer 2020 Report was cost-based and had a nearly 100% response rate for our Tribal pharmacy providers and these results from the methodology are consistent with the requirements in the regulation and ensures access.

We share a mutual goal to expeditiously finalize a new dispensing fee based on the 2019 Cost Dispensing Fee Survey which includes cost-impacts of the COVID-19 Pandemic Era. A process of open communication moving forward will support our joint work to achieve a timely approval of a new set of rates on pharmacy dispensing fees, and we look forward to additional conversations on a path forward.

We appreciate our ongoing collaborative work on resolving this pharmacy dispensing fee rate. 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 Dan Nelson, Director of Pharmacy at [daniel.nelson@tananachiefs.org](mailto:daniel.nelson@tananachiefs.org) or 907-451-6682 ext. 3621.

Sincerely,

TANANA CHIEFS CONFERENCE

A handwritten signature in blue ink, appearing to read 'BR'.

Brian Ridley,  
Chief/Chairman