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Dear Tribal Health Leaders,

The Department of Health (the department) wishes to express appreciation for the time and attention tribal health organizations spent reviewing the proposed state plan amendment to update specific fee schedule dates and providing thoughtful comments for consideration. The following information represents a record of tribal comments (verbatim where included) and includes department responses to comments received during tribal consultation of the demonstration. The department received comments from Southcentral Foundation.

Tribal Comment #1 –

Thank you for the opportunity to provide Tribal Consultation comments related to the proposed changes to the fee schedules for a variety of services authorized under the state Medicaid plan. While the inflationary and other adjustments across fee schedules are welcome to stabilize the delivery of care across the state, it is disappointing to see that one service will receive no rate adjustments – behavioral analysis.

Department Response – The department is appreciative of the received comments. This proposed amendment updates the effective dates to the fee schedules in the Medicaid state plan to align with department fee schedules that are updated annually. Currently, there is not an annual rate adjustment for services provided by licensed behavior analysts. The proposed change in this SPA will update the effective date to the fee schedule for these services to match the effective date posted on the department’s website.

Tribal Comment #2 –

Licensed behavioral analysts provide essential services for children with a diagnosis on the autism spectrum. Families receiving the services of Board-Certified Behavior Analysts (BCBAs) early on in their child’s life are less likely to become overwhelmed with the challenges presented by the child’s diagnosed condition. However, right now, there are too few providers who can furnish these services, often due to the inadequate reimbursement rates from the state’s Medicaid program. If these rates were increased, more providers could bring on BCBAs or start new behavioral analysis programs.

Department Response – The department acknowledges Southcentral Foundation’s concern that Medicaid reimbursements rates impact beneficiary access to services provided by licensed behavior analysts. The department has begun tribal consultation notification for a proposed SPA, in alignment with regulations, to update the fee schedule. The department invites comments for the proposed amendment.

Tribal Comment #3 –

Southcentral Foundation (SCF) provides these services for children and families across Alaska through both a clinic in Anchorage and via telehealth. However, the need for these services is high throughout the state and inadequate reimbursement rate does not allow SCF to expand this service to meet the needs for all Alaska Native children statewide. I urge the department to reconsider the adequacy of not adjusting the rates for behavioral analysis.

Department Response – Please refer to the department response under Tribal Comment #2.

Tribal Comment #4 –

Thank you for your time and consideration of these comments.

Department Response – The department appreciates the thoughtfulness of the comments.