



October 30, 2019

Courtney King
Alaska Department of Health and Social Services
4501 Business Park Boulevard, Building L
Anchorage, Alaska 99503
Via Email: courtney.king@alaska.gov

Re: Medicaid Drug Utilization Review State Plan Amendment

Dear Ms. King:

Southcentral Foundation provides these comments in response to the SPA to implement the Medicaid Drug Utilization Review (DUR) provisions included in Section 1004 of the Substance Use-disorder Prevention that Promotes Opioid Recovery and Treatment for Patient and Communities Act (SUPPORT Act).

Southcentral Foundation (SCF) is the Alaska Native tribal health organization designated by Cook Inlet Region, Inc. and eleven Federally-Recognized Tribes – the Aleut Community of St. Paul Island, Igiugig, Iliamna, Kokhanok, McGrath, Newhalen, Nikolai, Nondalton, Pedro Bay, Telida, and Takotna – to provide healthcare services to beneficiaries of the Indian Health Service pursuant to a compact with the United States government under the authority of P.L. 93-638, as amended, the Indian Self Determination and Education Assistance Act.

SCF provides services to more than 65,000 Alaska Native and American Indian people living in the Municipality of Anchorage, the Matanuska-Susitna Borough and 55 rural Alaskan villages. Services provided by SCF include outpatient medical care, home health care, dentistry, optometry, psychiatry, mental health counseling, substance abuse treatment, residential treatment facilities for adolescents and for women, suicide prevention and domestic violence prevention. We employ numerous staff, all of whom work in harmony to treat patients for the best access to quality care.

Overall, we support the changes and have had these practices in place for some time. We would like to ask for a specific expansion of section 7141 regarding infections associated with illicit drug use. A high percentage of pregnant woman who have a history of illicit drug use have a higher incidence of Hepatitis C. Given that it is common for pregnant woman to not want to admit this history, it would be beneficial for Medicaid to pay for screening all pregnant women for Hepatitis C. This disease is treatable and if it is transmitted to an infant, they can be treated when they are older. However, if Hepatitis C in women and children is missed, the incidence of liver disease, liver failure, hepatic cancer, and death are increased.

With all of the changes, we do worry about the data and reporting burden that could be placed on providers. As you know, our resources are limited and we prefer to keep administrative reporting from growing so that our valuable time and resources can be spent delivering care. We ask the state to consider only using existing data or, if new reporting is needed, to ensure that other administrative reporting requirements are lessened so that that, in net, providers do not experience increased reporting burden.

Thank you for your consideration of our comments and recommendations. We look forward to a continuing dialogue with the Department on this matter.

Sincerely,
SOUTHCENTRAL FOUNDATION



Katherine Gottlieb, MBA, DPS, LHD
President/CEO

Acting
For