



Alaska Native Health Board

THE VOICE OF ALASKA TRIBAL HEALTH SINCE 1968

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September 4, 2020

Courtney O’Byrne King,
State Plan Coordinator and Legislative Liaison
Division of Health Care Services,
Alaska Department of Health & Social Services,
4501 Business Park Blvd., Building L,
Anchorage, AK 99503
Via Email: Courtney.King@alaska.gov

RE: Medicaid Vaccine Coverage & Reimbursement State Plan Amendment

Dear Ms. King,

The Alaska Native Health Board (ANHB)¹ appreciates the opportunity to provide comments on the proposed Medicaid State Plan Amendment (SPA) regarding Vaccine Coverage and Reimbursement. We note the importance and timing of these changes during the current 2019 Novel Coronavirus (COVID-19) global pandemic, to include “pandemic influenza” and “a vaccine, and administration of a vaccine, related to a federal or state-declared public health emergency

Overall, we believe these changes are positive. We support the changes which recognize pharmacists as independent practitioners to administer vaccines under the Medicaid Program. This is an important change that will allow for wider delivery of seasonal influenza and other routine vaccines to AN/AI patients. While the inclusion of pharmacists in Medicaid vaccine administration is appreciated, we believe that the list of covered providers who are permitted to administer and be reimbursed for vaccine services does not fully recognize the difficulties of administering vaccines in remote communities.

Under the proposed changes, only physicians, advanced practice registered nurses (APRN), physician assistants (PA), and pharmacists are listed reimbursable provider types for this Medicaid provision. We seek clarification from the Department if registered nurses (RN), licensed practical nurses (LPN), certified medical assistants (CMA), and community health aids (CHA) are also reimbursable for the administration of covered vaccines under this proposed Medicaid SPA. If the services of these support staff and physician extenders are not reimbursable under these changes, we urge the Department to add them as covered provider types. If vaccine administration by these personnel is not covered, many providers will have no real choice but to use upper level health care

¹ ANHB was established in 1968 with the purpose of promoting the spiritual, physical, mental, social, and cultural well-being and pride of Alaska Native people. ANHB is the statewide voice on Alaska Native health issues and is the advocacy organization for the Alaska Tribal Health System (ATHS), which is comprised of tribal health programs that serve all of the 229 tribes and over 180,000 Alaska Native and American Indian (AN/AI) people throughout the state. As the statewide tribal health advocacy organization, ANHB helps Alaska’s tribes and tribal programs achieve effective consultation and communication with state and federal agencies on matters of concern.

ALASKA NATIVE TRIBAL
HEALTH CONSORTIUM

ALEUTIAN PRIBILOF
ISLANDS ASSOCIATION

ARCTIC SLOPE
NATIVE ASSOCIATION

BRISTOL BAY AREA
HEALTH CORPORATION

CHICKALOON VILLAGE
TRADITIONAL COUNCIL

CHUGACHMIUT

COPPER RIVER
NATIVE ASSOCIATION

COUNCIL OF ATHABASCAN
TRIBAL GOVERNMENTS

EASTERN ALEUTIAN TRIBES

KARLUK IRA
TRIBAL COUNCIL

KENAITZE INDIAN TRIBE

KETCHIKAN
INDIAN COMMUNITY

KODIAK AREA
NATIVE ASSOCIATION

MANILLAQ ASSOCIATION

METLAKATLA INDIAN
COMMUNITY

MT. SANFORD
TRIBAL CONSORTIUM

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OF EKLUKNA

NATIVE VILLAGE OF EYAK

NATIVE VILLAGE
OF TYONEK

NINILCHIK
TRADITIONAL COUNCIL

NORTON SOUND
HEALTH CORPORATION

SELDOVIA VILLAGE TRIBE

SOUTHCENTRAL
FOUNDATION

SOUTHEAST ALASKA REGIONAL
HEALTH CONSORTIUM

TANANA CHIEFS CONFERENCE

YAKUTAT TLINGIT TRIBE

YUKON-KUSKOKWIM
HEALTH CORPORATION

VALDEZ NATIVE TRIBE

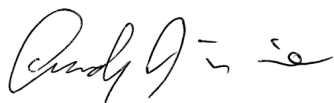
professionals to administer vaccines, even though using them is not medically necessary and would place a needless strain on a health care system that suffers from an extreme shortage of qualified health professionals, being made worse by COVID-19 fears.

Further, if physicians, APRNs, PAs, and pharmacists are the only reimbursable provider types for vaccine administration, it will severely limit the timely and cost-effective administration of these life-saving vaccines in the many communities that lack those practitioners. In the Alaska Tribal Health System (ATHS), the primary health care professional available in our remote and frontier clinics is the CHA; in the regular course of their work, CHAs already administer many vaccines. It is important that CHAs are covered for these vaccine services under Medicaid to meet the cost of delivering these services in our state's remote communities to Medicaid beneficiaries. The geographic challenges of wide-spread vaccine administration in Alaska cannot be overstated; and they arise at every step along the way, from the planning process, to shipment of vaccine doses, to maintenance of vaccines on site, to administration. As we think ahead to how we will deliver a statewide, COVID-19 vaccine in a timely and cost-effective manner, it is essential that we take full advantage of all available health care personnel, and that Medicaid reimburse for vaccine administration by any health care worker acting within the scope of their licensed or certified practice.

In closing, we believe that these changes to Medicaid vaccine coverage and reimbursement are positive, but we urge the state to clearly include health care personnel such as RNs, LPNs, CMAs, and CHAs as covered providers for the purposes of these changes. The coverage of provider support staff and physician extenders is crucial for the ATHS, but we believe it is also important for non-tribal providers, which also rely on those personnel to administer the vast majority of vaccines. The Department should ensure these changes accurately reflect health care practice on the ground.

If you have any questions regarding these comments, please contact ANHB at (907) 562-6006 or by email at anhb@anhb.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Jimmie". The signature is fluid and cursive, with a small flourish at the end.

Andrew Jimmie, Tribally-Elected Leader of the Village of Minto
Chairman
Alaska Native Health Board