



Alaska Native Health Board

THE VOICE OF ALASKA TRIBAL HEALTH SINCE 1968

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May 31, 2022

Courtney O'Byrne King,
Medicaid State Plan Coordinator
Alaska Department of Health and Social Services
3601 C Street, Suite 902
Anchorage, AK 99503

RE: Proposed Medicaid SPA on New Single Medicaid State Agency

Dear Ms. King,

The Alaska Native Health Board (ANHB)¹ writes to provide comment on the proposed Medicaid State Plan Amendment (SPA) designating a new single Medicaid State Agency (MSA) pursuant to the Social Security Act, section 1902(5) and conforming State Plan Amendments. We appreciate the opportunity to have Tribal Consultation on the proposed Medicaid SPA and the impacts it will have on the Alaska Tribal Health System.

We would like to begin our comments by recognizing that the State is amending its Medicaid State Plan to reflect the new single MSA as required by the Social Security Act, section 1902(5) and incorporating an organization chart to reflect the new MSA divisions and leadership. We appreciate the Department of Health & Social Services (DHSS) for the engagement on the proposal to separate the Department of Health & Social Services into a Department of Health (DoH) and a Department of Family & Community Services (DFCS), particularly the Department's efforts to answer questions regarding the proposal, the inclusion of Tribal Liaison positions in both of the Commissioners' Offices of the new departments, the maintenance of current designated Tribal office and points of contact within respective divisions of the new departments, and the promise of stakeholder engagement on the implementation of Executive Order 121 which has precipitated the proposed SPA under Consultation.

Based on our understanding of the proposed SPA described in the Dear Tribal Leader Letter dated April 11, 2022, ANHB recommends that the Medicaid State Plan Tribal Consultation Policy (TCP), found at Section 1.4 of the Medicaid State Plan, page 9, be updated to accurately identify the DoH as the MSA and to include the new DFCS as appropriate to address the issues related to Medicaid

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 180,000 Alaska Native and American Indian 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.

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HEALTH CORPORATION

VALDEZ NATIVE TRIBE

service delivery for which the new DFCS will be responsible, including but not limited to behavioral health crisis care, behavioral health inpatient care, child welfare services covered by Medicaid, and long-term services and supports delivered by relevant divisions.

Due to the use of quarterly and regular Tribal meetings as an identified part of the Medicaid State Plan TCP (see page 9(i), TCP section 2.2), ANHB recommends that the commissioners from both DoH and DFCS and their teams remain committed to attending the ANHB Mega Meetings as part of the open dialogue and working relationship we maintain with DHSS on a number of issues. We further recommend that both DoH and DFCS attend and have a role in the Tribal-State Medicaid Task Force meetings due to the cross-cutting issues that often come up, particularly for behavioral health care.

Finally, ANHB recommends that both new Departments adopt independent and written tribal consultation policies and consult with Tribes in the development of the policies, in addition to the Medicaid State Plan TCP. We recommend as a model the DHSS Departmental Consultation Policy adopted in 2018, which should be inherited by DoH and the adoption of a mirror policy to DFCS.

Thank you for this opportunity to provide comments on the proposed Medicaid SPA to align the Medicaid State Plan to the DoH and the complex issues it creates with the new DFCS. If you have questions or need additional information regarding our recommendations in this letter, you may contact ANHB by email at ANHB@ANHB.ORG or by telephone (907) 729-7510.

Duk'idli (Respectfully),



Diana L. Zirul
Chair, Alaska Native Health Board
Tribally-Elected Leader of the Kenaitze Tribal Council