



Alaska Native Health Board

THE VOICE OF ALASKA TRIBAL HEALTH SINCE 1968

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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

MANIILAQ ASSOCIATION

METLAKATLA INDIAN
COMMUNITY

MT. SANFORD
TRIBAL CONSORTIUM

NATIVE VILLAGE
OF EKLUTNA

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

Submitted via regulations.gov

January 30, 2025

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Re: Medicaid and Children's Health Insurance Program (CHIP) Generic Information
Collection Activities: Proposed Collection; Comment Request (90 FR 4744)

Dear Administrator Brooks-LaSure:

The Alaska Native Health Board (ANHB)¹ writes to provide support for the Centers for Medicare and Medicaid Services (CMS) notice on the Medicaid and Children's Health Insurance Program (CHIP) Generic Information Collection Activities; Proposed Collection; Comment Request regarding the form CMS-10398 #91, State Plan Amendment (SPA) Template for Medicaid Clinic Benefit. ANHB is grateful for the historic CY2025 Hospital Outpatient Prospective Payment System (OPPS) final rule and SPA template for Medicaid Clinic Benefit that amends clinic regulations to allow for the reimbursement of clinic benefit services provided outside the four walls for Tribal and IHS facilities with the option for states to opt in to cover clinic services furnished outside the "four walls" of behavioral health clinics or clinics located in rural areas.

Upon reviewing the SPA template, ANHB supports amendments to Section 1905 (a) (9) Clinic Services language. This section includes sections on General Assurances; Types of Clinic Services and Limitations in Amount, Duration, or Scope; Four Walls Exceptions, and; Additional Benefit Description. As written, the template encapsulates the services provided by IHS and Tribal clinics to work congruently with state Medicaid agencies.

¹ ANHB was established in 1968 to promote 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 people throughout the state. As the statewide Tribal health advocacy organization, ANHB supports Alaska's Tribes and Tribal programs to achieve effective consultation and communication with state and federal agencies on matters of concern.

For your awareness, the Federal Register on CMS-1809-FC, section XVII Medicaid Clinic Services Four Walls Exceptions has a typo on page 94442, which states, "\$2.8 million AI/ANs who are eligible for services from IHS" when it should state, "2.8 million AI/ANs who are eligible for services from IHS."

Again, we thank CMS for drafting the SPA template for the Medicaid Clinic Benefit. This proposed template will ensure IHS and Tribal clinics are appropriately reimbursed for services delivered to Alaska Native and American Indian (AN/AI) beneficiaries, especially in rural areas, health provider-shortage areas, and school-based health centers. This historic amendment will improve the health status of AN/AI beneficiaries for generations to come.

We thank CMS for the opportunity to provide comments and support for this SPA template. If you have any comments or questions regarding our recommendations in this letter, please contact ANHB at anhb@anhb.org or via telephone at (907) 729-7510.

Sincerely,

A handwritten signature in black ink, appearing to read "W F Smith". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Chief William F. Smith, Chairman
Alaska Native Health Board