



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of  
Health and Social Services**

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December 20, 2018

Heather Ross, Project Officer  
State Demonstrations Group  
Centers for Medicare and Medicaid Services (CMS)  
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7500 Security Boulevard  
Baltimore, MD 21244- I 850  
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Dear Ms. Ross,

This letter is to confirm the state of Alaska's acceptance of CMS' Special Terms and Conditions (STCs) for its Section 1115 demonstration titled "Substance Use Disorder Treatment and Alaska Behavioral Health Program" (SUD – BHP) (project number 11-W-00318/0).

Alaska has reviewed the STCs as provided on November 21, 2018 and have the following technical corrections.  
[Document attached.]

As you know, the substance use disorder waiver is a key component of Alaska's goals to reform its behavioral health system. The state looks forward to working with CMS to finalize the remaining sections of the 1115 behavioral health waiver.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert E. Wall".

Albert E. Wall  
Deputy Commissioner  
Department of Health and Social Services

Attachment: Technical Edits  
Cc: David Meacham, Associate Regional Director, CMS Seattle Regional Office

State of Alaska Technical Edits to CMS SUD BHP Project Number 11-W-00318/0 approval letter

1. Pg 12/13: The CMS approval letter does not include Alaska waiver authority for Level 3.5 for women and children. This is currently not covered in Alaska's state plan and Alaska requested waiver authority for it in the SUD Imp Plan.
2. Pg 13: Ambulatory Withdrawal Management:
  - a. Approval letter lists "Ambulatory Withdrawal Mgt" as a waiver service. AK SUD plan indicates that the need for a SPA to fix definition for 1 ambulatory withdrawal management level 1 and Alaska is only asking for coverage for ambulatory withdrawal management level 2 through the 1115.
  - b. In SUD plan AK has 3.2 and 3.7 levels of withdrawal management listed as currently covered in state plan, but approval letter indicates it is under 1115 expenditure authority.
3. Pg 13/ 20: The CMS document labeled this as "Recovery Peer Services." There is inconsistency throughout CMS approval letter for this service, sometimes "peer" is included and other times it is not. Please re-label as "Recovery Support Services."
4. Pg 12: Please note: some residential is in the state plan- not all of it is in 1115 authority
5. Pg 14: Please include SUD Care coordination for all pharmacotherapy, not just specific to opioids.
6. Pg 18 /19: Recovery Support Services is missing as a component service for some of the residential and Withdrawal Management definitions, and it is present in others.
7. Pg 26: The state's SUD/ODU Medicaid delivery system is based on a fee-for-Service (FFS) model for physical and behavioral health. The state delivers SUD services via a FFS delivery system for beneficiaries. Under the demonstration, Medicaid Section 1115 Behavioral Health Demonstration will continue to operate as approved in ~~Section 1932(a)~~ state plan authority for FFS.

Technical Edit:

The state's SUD/ODU Medicaid delivery system is based on a fee-for-Service (FFS) model for physical and behavioral health. The state delivers SUD services via a FFS delivery system for beneficiaries. Under the demonstration, Medicaid Section 1115 Behavioral Health Demonstration will continue to operate as approved in Section 1932(a) 1902(a) state plan authority for FFS.