

Department of Health and Social Services

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The following information represents a record of tribal comments (transcribed verbatim) and state responses from tribal consultation on a proposed state plan amendment (SPA), updating the effective date of the rate schedule for inpatient psychiatric services for individuals under 21 years of age.

Comment #1

Southcentral Foundation – Thank you for the opportunity to provide Tribal consultation comments on the proposed state plan amendment related to rates for inpatient treatment for those under the age of 21. The proposed increases in payment rates will help incentivize the build-out of services for adolescent populations and better serve Alaskans seeking behavioral health treatment. Southcentral Foundation does not have any concerns with the proposed state plan amendment.

<u>Response</u>: Thank you for taking the time to provide comments on the proposed change in effective date on the rate schedule for inpatient psychiatric services for individuals under 21 years of age.

Comment #2

Alaska Native Health Board – ANHB is generally supportive of this proposed SPA and the associated regulatory rate changes. The new rates will help meet the cost of care. We do continue to have a concern, however, that the changes do not go far enough, particularly for the transitions of care rate. Currently, the transitions of care rate is \$211 which does not meet the cost to deliver care on transition of care days. We recommend that the Department consider a new rate for transitions of care which better meets the cost of the delivery of care on these days of transition. The Department could, for example, set the reimbursement for transitions of care to 85% of the daily rate for the level of care provided to the beneficiary. Using a percentage not only better matches the cost of care, but it also adjusts with the level of care being delivered.

Response: Thank you; the department takes this comment under advisement.

Comment #3

Alaska Native Health Board – ANHB further recommends that the Department consider implementing a regional adjustment for these rates, similar to the regional adjustments used by the Division of Senior and Disability Services for Home- and Community-Based Waiver services, as a means of making the service financially viable for rural and remote providers. Regional adjustments allow reimbursements to better meet the cost of delivering these services in rural locations where costs of care are significantly higher, and can work to make services more readily available by increasing the sustainability of services.

Response: Thank you; the department takes this comment under advisement.

Comment #4

Alaska Native Health Board – We again thank the Department for this opportunity to provide these comments. We

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believe these proposed changes are positive, and we encourage the Department to take further steps to make these services more sustainable in rural Alaska.

<u>Response</u>: Thank you for taking the time to provide comments on the proposed change in effective date on the rate schedule for inpatient psychiatric services for individuals under 21 years of age.