



Janice K. Brewer
Governor

Kim Russell
Executive Director

ADVISORY COUNCIL ON INDIAN HEALTH CARE

Wakina Scott, Ph.D.
Division of State Demonstrations and Waivers
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-01-16
Baltimore, MD 21244

RE: Renewal of Uncompensated Care Payments for Services Provided by Indian Health Services (IHS) and P.L.-638 Tribal Health Care Facilities under the 1115 Demonstration Waiver Amendment

Dear Dr. Scott,

The Advisory Council on Indian Health Care (ACOIHC) strongly urges the permanent renewal of the uncompensated care payments provided to Indian Health Services (IHS) and P.L.93-638 Tribal Health Care Facilities under the 1115 Demonstration Waiver amendment for services that were limited or eliminated by the State of Arizona. This Waiver amendment is scheduled to expire on December 31, 2014 and will severely impact an already fragile delivery system that provides critical care for a population struggling to overcome healthcare disparities.

Tribes in Arizona battle huge economic challenges with high unemployment rates and even higher percentage of uninsured members. The high percentage of poverty and unemployment indicates that without the renewal of the uncompensated care payments, the likely impact upon our Tribal members will be disproportionately greater than upon the general public. An estimated 5 to 6% of Arizona's total population is American Indian and comprise 10% of all AHCCCS members. In addition, many tribal members in Arizona live in highly rural areas and the Indian Health Services or Tribal 638 programs serve as their only source of health care. Without reimbursement, the burden on the Indian Health Services or Tribal 638 health care facilities and systems will increase substantially without improving the present standard of care.

The State of Arizona was required to conduct a performance measures evaluation of the financial impacts the uncompensated care payments had on IHS and 638 Tribal facilities and the ACOIHC was a reviewer of this evaluation. According to the performance evaluation results it indicated that payments made by AHCCCS under this authority have been critical in maintaining an appropriate level of health care delivery for current and future Medicaid beneficiaries through IHS and 638 Tribal health care facilities and warded off staffing reductions and elimination of services,

The ACOIHC continues to advocate for the continuance of this Waiver so that tribal members will not be adversely impacted by past decisions to eliminate and restrict benefits. Even though Governor Brewer's plan to restore coverage to childless adults and Medicaid expansion up to 133% FPL was passed and signed into law on June 17, 2013, these particular services were not restored.

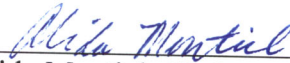
For the reasons stated, the ACOIHC urges the prompt and permanent renewal of the 1115 Demonstration Waiver uncompensated care payments.

The ACOIHC was established in 1989 pursuant to Arizona Revised Statute and consists of Tribal representatives appointed by the Governor of the State of Arizona and federal representatives that serve as technical advisors. Our mission is to advocate for increasing access to high quality health care programs for all American Indians in Arizona.

Sincerely,



Kim Russell, Executive Director
Advisory Council on Indian Health Care



Alida Montiel, Chairperson
Advisory Council on Indian Health Care