



## **Licensure of Private Non-Medicare Entities on Reservations**

### **Timeline of Events**

- July 20, 2012 - AHCCCS was notified by CMS letter that non-IHS/non-638 provider entities operating on and off reservations would need to obtain State licensure per federal regulations (see CMS letter)
- September 14, 2012 - AHCCCS reply to CMS letter (see AHCCCS response letter)
- September 27, 2012 – AHCCCS Tribal Consultation
  - Licensure topic on agenda
  - Included conference call with Gloria Nagle, CMS
  - AHCCCS states position that Providers could continue during interim until Federal issue is resolved
- November 2012 - Vice-Chairman of Hopi Tribe, Herman Honanie and Tohono O’odham Councilman, Chester Antone meet with Secretary Sebelius to discuss licensure issue at a STAC meeting in Washington.
  - Recommend Tribal Attestation in lieu of state licensing
- January 8, 2013 – CMS (via email) asked if the State would consider accreditation (certificate of necessity) in lieu of licensure.
- February 21, 2013 - DHS holds internal meeting to discuss use of a blanket CON (certificate of necessity) as a means of credentialing.
  - Did not identify another approach for state licensing
- March 21, 2013 – AHCCCS received written communication from San Tan Behavioral Health Services indicating they have submitted an application to provide services on the Navajo Nation and are awaiting AHCCCS confirmation.
- April 10, 2013 - AHCCCS was notified by CMS that a letter will be forthcoming describing CMS’s position on the Arizona licensure issue.
- Late April or early May - AHCCCS will schedule meeting with Tribes affected by the licensure issue.
  - Hopi Tribe, Navajo Nation and Tohono O’odham
- May 13, 2013 – AHCCCS Tribal Consultation meeting
  - Participants: Navajo Nation, Hopi Tribe and Tohono O’odham
  - Licensure/Credentialing agenda topic