



JUL 31 2014

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,

On behalf of the Tucson Area Indian Health Service, I write to strongly urge the renewal of the uncompensated care payments provided to Indian Health Service (IHS) and P.L.-638 Tribal Health Care Facilities under the 1115 Demonstration Waiver amendment for services that were limited or eliminated by the State of Arizona. The Waiver amendment will expire on December 31, 2014.

On November 1, 2013, the Arizona State Medicaid system, Arizona Health Care Cost Containment System (AHCCCS) requested an amendment to the State's 1115 Demonstration Waiver. As requested, the amendment would continue its current authority to provide uncompensated care payments through September 30, 2016 to Indian Health Service (IHS) and 638 Tribal facilities for services provided to Medicaid-eligible adults that were eliminated or limited on October 1, 2010. On December 26, 2013, AHCCCS was notified that the amendment was approved by CMS to continue uncompensated care payments but for only one year.

As indicated in the Medicaid section of the 1115 Demonstration Waiver Special Terms and Conditions (STCs), 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. The evaluation was conducted and the results of the evaluation revealed 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. The responses to the evaluation survey show these payments warded off staffing reductions and elimination of services, which would have severely impacted an already fragile delivery system that provides critical care for a population struggling to overcome healthcare disparities.

Our Tohono O'odham tribal members can be considered highly disadvantaged in regards to the unemployment rate and even higher percentage of uninsured members. These members have only the limited Indian Health Service benefits to rely upon without additional healthcare coverage.

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Care Facilities under the 1115 Demonstration Waiver Amendment

At the Tohono O'odham Nation, the high percentage of poverty and unemployment indicates that without the renewal of the uncompensated care payments, the likely impact upon our members will be disproportionately greater than upon the general public. Without reimbursement, the burden on our local health care delivery system will increase substantially without improving the present standard of care.

For the reasons stated, the Tucson Area Indian Health Service urges the prompt renewal of the 1115 Demonstration Waiver uncompensated care payments for an indefinite period of time. You may contact me at 520/295-2405 if you have any questions.

Respectfully,



Priscilla Whitethorne
Acting Area Director
Tucson Area Indian Health Service