

# Tanana Chiefs Conference

Chief Peter John Tribal Building

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Rec'd 7/16/06

June 27, 2006

## SUBREGIONS

### UPPER KUSKOKWIM

McGrath  
Medfra  
Nikolai  
Takatna  
Telida

Betty Gould, Regulations Officer  
Division of Regulatory Affairs, Records Access & Policy Liaison  
Indian Health Service  
801 Thompson Avenue, Suite 450  
Rockville, Maryland 20852

### LOWER YUKON

Anvik  
Grayling  
Holy Cross  
Shageluk

**Re: Comments on Proposed Regulations regarding "Medicare-Like Rates"**

Dear Ms. Gould:

### UPPER TANANA

Dot Lake  
Eagle  
Healy Lake  
Northway  
Tanacross  
Teffin  
Tok

Tanana Chiefs Conference carries out programs of the Indian Health Service (IHS) under the Indian Self-Determination and Education Assistance Act, 25 U.S.C. 450 et seq. Like IHS direct operated programs and other tribal programs, we are reliant on contract health services to acquire many critical health services for our beneficiaries. We strongly endorse these proposed regulations.

### YUKON FLATS

Arctic Village  
Beaver  
Birch Creek  
Canyon Village  
Chalkyitsik  
Circle  
Fort Yukon  
Venetie

Contract health services (CHS) funding is extremely limited, as is the IHS. funding overall. Many health needs of our patients must go unmet due to the limitations in funding. These regulations, which impose a ceiling on the amount Medicare-participating hospitals, can charge for services provided to individuals covered by IHS or tribal CHS programs or on referral from urban organizations. The amount that can be charged is based on a slightly simplified version of the rates Medicare would pay, if it were the direct payor. Coordination of benefits, restrictions on additional charges and claims processing are also addressed. We strongly support each of these provisions.

### YUKON KOYUKUK

Galena  
Huslia  
Kaitag  
Koyukuk  
Nulato  
Ruby

The provisions assure that limited Federal funds are used to the greatest advantage. They will lead directly to improved access to necessary care by American Indians and Alaska Natives. Given the severe restrictions that have existed with regard to access to contract health services, it does not exaggerate to say that these new regulations are likely to save some lives.

We realize that some Medicare-participating hospitals may complain about having to accept Medicare-like rates for additional patient services. We believe the importance of these regulations outweighs such concerns and that Medicare rate setting has built in protections against rates that are too low to be reasonable.


### YUKON TANANA

Alatna  
Allakaket  
Evansville  
Fairbanks  
Hughes  
Lake  
Minchumina  
Manley Hot  
Springs  
Minto  
Nenana  
Rampart  
Stevens Village  
Tanana

We appreciate the effort made by the IHS and Centers for Medicare & Medicaid Services (CMS) in promulgating these regulations and look forward to their immediate implementation.

Sincerely,

TANANA CHIEFS CONFERENCE



Jerry Isaac, Chairman & President