

Rec'd 7/6/06



ALAMO NAVAJO SCHOOL BOARD, INC.

P.O. Box 907
Magdalena, NM 87825
Voice (505) 854-2543

Fax (505) 854-2545

Business Office
Ext. 1300

Community School
Ext. 1100

Early Childhood
Ext. 1500

Facilities Mgmt
Ext. 1700

Health Services
505-854-2626

Community Services
Ext. 1400

Transportation Dept.
Ext. 1797

KABR Radio Station
Ext. 1600

June 22, 2006

Betty Gould, Regulations Officer
Division of Regulatory Affairs
Indian Health Service
801 Thompson Avenue, Suite 450
Rockville, MD 20852

Re: Comments on Section 506, MMA, Medicare-like Rates Proposed Rule

Dear Ms. Gould:

The Alamo Navajo School Board, Inc. (ANSB), pursuant to the April 28, 2006, Federal Register notice (Vol. 71, No. 82) hereby provides the following comments on Section 506 of the Medicare Prescription Drug, Improvement, and Modernization Act of 2003 – Limitation on Charges for Services Furnished by Medicare Participating Inpatient Hospitals to Indians.

We support the implementation of the proposed rule; however we advocate for an effective date for the proposed rule retroactive to December 2004, when as required by law, the regulations were to be promulgated by the Secretary of Health and Human Services. The immediate effect of this rule will be to reduce the amount of money paid out from an already underfunded Indian health care system to private hospitals for care and put the Indian health care system on a level playing field with other federal purchasers of health care (Department of Defense and the Veterans Administration) who have for years had legislatively protected and favorable rates. Reducing the contracted costs of inpatient and outpatient services purchased by the Indian health care system in the private sector will enable it to provide more health care services where necessary services are now rationed, deferred, and often denied.

This needed rule is long overdue and resistance to it by some participating private sector hospitals is expected. It is therefore imperative that enforcement of this rule be a high federal priority to ensure that the federal dollars used by the Indian health care system are not wasted in meeting the federal trust responsibility for health care to Indians and ameliorating the severe health disparities for Indians that are so well documented.

Sincerely,

Michael Hawkes
Executive Director