



GREAT LAKES INTER-TRIBAL COUNCIL, INC.

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May 26, 2006

Rec'd 6/6/06

Betty Gould, Regulation Officer
Division of Regulatory Affairs, Records
Access and Policy Liaison
Indian Health Services
801 Thompson Avenue, Suite 450
Rockville, Maryland 20852

Dear Ms. Betty Gould:

SUBJECT: Comments on Section 506, MMA, 2003-Medicare Like Rates Provision

On behalf of Great Lakes Intertribal Council, I write to respectfully request your support for the American Indian/Alaska Native (AI/AN) Medicare Provision. GLITC appreciates this opportunity to comment 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", as published in the Federal Register/Vol. 71 No. 82/Friday . April 28, 2006.

We support the implementation of the proposed rule. Wisconsin Tribally Operated Health Programs (WTOHP), Area Health Boards, and the Indian Health Services, and Centers for Medicare and Medicaid Services have all done extensive review of this rules and potential outcomes. They have all determined that extending Medicare Like rate to the Indian Health Services/Tribally Operated Health Programs/Urban Program (I/T/U) will have a noticeable positive effect on many of the I/T/U programs which operate at approximately 60% of Level of Need Funded presently.

We do have some concerns regarding this proposed rule. First, there has been an unacceptable delay in publishing and moving forward with this action. Wisconsin Tribes were told that the problem was within Indian Health Services, then within Centers for Medicare and Medicaid Services, then office of Management and Budget. It became a federal pointing issue. We are two years late in implementing this regulation. Hopefully, this has been resolved and once the comments are in, the process can move forward quickly. Many of our Wisconsin Tribal Health care centers have been waiting on this action. Secondly, we ask that staff from the centers for Medicare and Medicaid Services actively support the Medicare Like rates Provision. We anticipate that some participating private sector, rural acute care hospitals will "push-back: both formally and informally, we ask that the enforcement of this provision be a high priority

Again, we appreciate this opportunity for comment and do support the proposed rules as published. Should you have questions regarding this matter, please contact Mr. Glen Safford P.Safford, MA (HSA), MSSW, Deputy Director at 715.588.3324, ext. 127.

Sincerely,

Michael, Allen, Sr.
Executive Director
Cc: Glen Safford