



The Grand Traverse Band of Ottawa and Chippewa Indians

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*Rec'd
6/28*

June 27, 2006

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

Ms. Gould:

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

The Grand Traverse Band of Ottawa and Chippewa Indians 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 this proposed rule. Tribally Operated Health Programs (TOHP), Area Health Boards, and the Indian Health Service, and Centers for Medicare and Medicaid Services have all done extensive reviews of this rule and potential outcomes. They have all determined that extending Medicare Like Rates to the Indian Health Service/Tribally Operated Health Programs/Urban Programs (I/T/U) will have a noticeable positive effect on many of the I/T/U programs which operate at approximately 50% 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. Tribal staff was told that the problem was within Indian Health Service, then within Centers for Medicare and Medicaid Services, then Office of Management and Budget. It became a federal finger 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 health programs throughout Indian Country 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 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 rule as published. Should you have questions regarding this matter, please contact Mr. Soumit Pendharkar, Health Administrator at (231) 534-7477 or Ms. Sonya Zotigh, Tribal Manager at (231) 534-7136.

Sincerely,



Bob Kewaygoshkum, Chairman
Grand Traverse Band of Ottawa & Chippewa Indians

CC: Tribal Manager's File
Dr. Charles Grim, Director, Indian Health Service
National Indian Health Board

