



Choctaw Nation of Oklahoma

Self-Governance

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Gary Batton
Chief

Jack Austin, Jr.
Assistant Chief

December 30, 2014

Betty Gould, Regulations Officer
Indian Health Service
801 Thompson Ave.
TMP STE 450
Rockville, MD 20852

Re: Comments on Proposed Medicare-Like Rates Application to Purchase Referred Care
(42 CFR part 136)

Dear Ms. Gould:

The proposed rule to amend Indian Health Services (IHS) regulations 42 CFR part 136 to apply Medicare-like Rates (MLR) to medical services provided by Purchased Referred Care (PRC) is a welcome addition to the current methodology which currently does not apply to non-hospital services, rehabilitation facilities, home-health or hospice, or other health professional services

The Choctaw Nation of Oklahoma Strongly supports this proposed rule targeted at the reform of the PRC component of the Indian Health Service. This change in regulation title PAYMENT FOR PHYSICIAN AND OTHER HEALTH ARE PROFESSIONAL SERVICES PURCHASED BY INDIAN HEALTH PROGRAMS AND MEDICAL CHARGES ASSOCIATED WITH NON-HOSPITAL BASED has been a long time coming. Hospital-based Medicare-Like Rates (MLR) have been available to the IHS and to Tribal Health Programs for several years.

Historically, the IHS has been grossly underfunded. We will not use this document to state facts that are public record. Testimony has been provided to Congress, letters sent to the White House, OIG reports have been produced and many everyday accounts of tragedies in health care within Indian Country have been documented—most due to inadequate funding.

The Proposed Rule is not the answer to the issue of inadequate funding in the overall Indian Health Service budget, or even an answer to the rationed care provided by the PRC program. However, it is an action that will save resources for both IHS and Tribal Health Programs, allowing both to expand needed services. As such, it is staunchly supported by the Choctaw Nation of Oklahoma.

We also strongly recommend that, once this proposed rule is adopted, that it be implemented in a reasonable but expedient timeframe. When hospital-based Medicare-Like Rates were adopted, there was over a two year delay in implementation due to bureaucratic inconsistencies.

If you have questions, or would like additional information, please do not hesitate to contact our Executive Director of Self-Governance, Mickey Percy, at mpercy@choctawnation.com or by phone at (580) 924-8280, extension 2240

Sincerely,

/Gary Batton, Chief/

Gary Batton
Chief
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