

National Indian Health Board



Delivered via electronic transmission to <yvette.roubideaux@ihs.gov>

May 25, 2011

Dr. Yvette Roubideaux, Director
Indian Health Service
Room 440 Reyes Building
801 Thompson Avenue
Rockville, MD 20852
April 4, 2011

**RE: IHS and Tribal Billing Arrangements with Department of Defense and
Department of Veterans Affairs**

Dear Director Roubideaux:

On behalf of the National Indian Health Board (NIHB), I am writing in regard to the implementation of section 405(c) of the Indian Health Care Improvement Act (IHCA). The revised IHCA added subsection (c) which requires the Department of Defense (DoD) and the Department of Veterans Affairs (VA) to reimburse the Indian Health Service (IHS), Tribes and tribal organizations when they provide services to beneficiaries eligible for services from either DoD or VA.

The authority for IHS, Tribes and tribal organizations to bill under this provision became effective on March 23, 2010. To date, a mechanism to conduct the billing has not yet been established. NIHB previously submitted comments and recommendations on this subject expressing a need for urgency in moving forward with implementation. Likewise, the Tribal Technical Advisory Group to the Centers for Medicare and Medicaid Services raised concerns regarding the implications for Medicaid billing from a delay in implementation.

We are requesting that IHS provide a timeline for implementation of section 405(c) and an indication of the avenues NIHB and other tribal representatives will have, and when, for meaningful input into the planning and implementation of this provision.

Thank you for your attention to this matter. NIHB is ready to engage with you and your staff, and with the VA and DoD, to ensure successful implementation of this provision.

Sincerely,

A handwritten signature in black ink that reads "Cathy Abramson". The signature is fluid and cursive.

Cathy Abramson
Chairman, National Indian Health Board

Cc: Stacy Bohlen, Executive Director, NIHB
Jennifer Cooper, Legislative Director, NIHB

