

100% FMAP State Health Official Announcement

Category: Policy Blog

written by NCUIH | February 29, 2016

On Friday, February 26, 2016 the Centers for Medicare & Medicaid Services (CMS) released the Dear State Health Official [letter regarding 100% FMAP](#) to inform state agencies and health officials about the update in payment policy affecting federal funding for services received by Medicaid-eligible individuals who are AI/ANs through facilities of the Indian Health Service (IHS), whether operated by IHS or Tribes. Through this letter, CMS is re-interpreting its payment policy with respect to services “received through” an IHS/Tribal facility, and is expanding the scope and nature of services that qualify for the matching rate.

This update to the national policy has Tribal implications for IHS and Tribal facilities as well as on Urban Indian Health Programs (UIHPs) that provide services to AI/AN Medicaid beneficiaries. CMS held several Tribal Consultations, participated in an Urban Conferring session between IHS and NCUIH, and solicited comments on the parameters of a reinterpretation of section 1905(b) of the Social Security Act as specified in CMS’ October 2015 Medicaid Services ‘Received Through’ and Indian Health Service/Tribal Facility: A Request for Comment.” They received comments from Tribes, Tribal organizations, urban Indian organizations, States, and other stakeholders in support of the proposed policy change.

The new policy is intended to help states, IHS, Tribes, and UIHPs improve the delivery of health to AI/AN Medicaid beneficiaries by increasing access to care and strengthening continuity of care. The letter outlining the new policy is attached and will be available online on Medicaid.gov [here](#). CMS will be holding an All Tribes’ Call to walk through the policy and provide time for questions and answers. They will send out a Save the Date notice for the All Tribes’ Call, and information about the All Tribes’ Call will be posted [here](#). We will make sure that notice gets sent out to UIHP Directors.

NCUIH believes that the new policy marks progress for UIHPs at the regulatory level. The CMS announcement coupled with the 100% FMAP for All Indian Health Programs inclusion in the President’s FY2017 budget demonstrates a desire by the government to achieve parity for Urbans within the Indian healthcare system for Medicaid beneficiaries. There are still determinations to be made regarding technical eligibility issues and operationalizing the updated CMS regulation. Consultations with State Medicaid programs and conferring sessions between IHS and NCUIH’s FMAP Work Group will be sought to clarify outstanding issues and to figure out the best way advance the interests of UIHPs within the context of the new FMAP regulation. NCUIH still seeks the help of all UIHPs in reaching out to Members of Congress to request support for the 100% FMAP provision within the President’s budget. Lastly, NCUIH would like to express gratitude to the FMAP Work Group (Donna Keeler - South Dakota, Aren Spark - Seattle, Walter Murillo - Phoenix, and Ashley Tuomi - Detroit) as well as all of the UIHP Directors that have contributed time and effort over recent days, weeks, months, and years towards achieving 100% FMAP inclusion for Urbans. Should you have any questions regarding this announcement, please contact Rudy Soto, NCUIH Policy Analyst, at rsoto@ncuih.org.