

[NCUIH Requests that CMS Include UIOs in its Proposed Framework on Reimbursement for Traditional Healing Services](#)

Category: Policy Blog

written by Alex Sampson | June 3, 2024

On March 27, 2024, and April 29, 2024, the National Council of Urban Indian Health (NCUIH) submitted comments to the Centers for Medicare and Medicaid Services (CMS) Director of the State Demonstrations Group, Jacey Cooper, regarding the Proposed Framework for Traditional Health Care Practices in Section 1115 demonstrations (“Proposed Framework”) in response to CMS’s request for feedback. CMS sought advice and input on the scope of coverage of Traditional Health Care Practices that could be provided at Indian Health Service (IHS) and Tribal facilities, recommendations on provider qualifications, and monitoring and evaluation criteria. As part of its responses, NCUIH requested that CMS include urban Indian organizations (UIOs) in the Proposed Framework because UIOs are critical to providing Traditional Healing services to urban American Indian and Alaska Native populations.

Background

During a [March 6, 2024, presentation](#), CMS provided an overview of the Section 1115(a) demonstration process and a high-level overview of the four pending demonstration proposals to cover Traditional Health Care Practices- Arizona, California, New Mexico, and Oregon. CMS discussed the development of a Proposed Framework for potential coverage of Traditional Health Care Practices, consistent with the authorities in the [Indian Health Care Improvement Act](#). The presented Proposed Framework does not include UIOs as eligible facilities. CMS solicited feedback following the March 2024 presentation and an [April 3, 2024, webinar on the Proposed Framework](#).

For more information on Section 1115 Demonstrations, please click [here](#).

Funding is a Barrier for UIOs to Provide Traditional Healing Services to Native People

Inclusion of UIOs in CMS’ Proposed Framework is critical, as UIOs fill an essential gap in care for American Indian and Alaska Native people living off reservations by providing culturally sensitive and community-focused care options, including traditional healing services and programs. Funding continues to be a barrier for UIOs to provide traditional healing services to their Native patients. They have to work to stretch already limited dollars to include these vital services because healthcare funding sources, including Medicaid, do not adequately reimburse for traditional healing services.

NCUIH’s Requests and Recommendations

In its March 27 comments, NCUIH requested that CMS:

- Include services delivered at UIOs to American Indian and Alaska Native Medicaid beneficiaries in the Proposed Framework.
- Host Urban Confers or UIO Listening Sessions Consistently Throughout the Development of

the Proposed Framework.

In its April 29, comments NCUIH recommended that CMS:

- Include Traditional Healing services provided at UIOs in the Proposed Framework.
 - Allow Tribes, UIOs, and States the flexibility to develop a solution which serves all American Indian and Alaska Native beneficiaries.
 - Ensure the Proposed Framework reflects the requests of Tribes and UIOs.
 - Ensure the Proposed Framework does not create inequities in care.
- Respect confidentiality for Traditional Healers and Traditional Healing practices.
- Engage with UIOs by hosting an Urban Confer and continue to engage with Tribes.

NCUIH will continue to monitor the development of the Proposed Framework and advocate for UIO inclusion.