

**Summary of IHS Tribal Self-Governance Advisory Committee (TSGAC) Correspondence/Comments on Health Care Reform Issues**  
**Year: 2014-2015**

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Updated: October 1, 2015

<b>Ref. #</b>	<b>Date Sent/ Received</b>	<b>Addressed To</b>	<b>Topic/Issue</b>	<b>Action(s) Needed</b>	<b>Response Received</b>
1.	9/30/15	Mr. Jeff Wu Deputy Director Center for Consumer Information and Insurance Oversight Centers for Medicare and Medicaid Services	Response to Request for Tribal Consultation on Referrals for Limited Cost-Sharing Variation Plans	TSGAC comments and recommendations.	
2.	8/4/15	Centers for Medicare and Medicaid Services Department of Health and Human Services Attn: CMS-10561	Comments on CMS-10561, ECP Data Collection to Support Qualified Health Plan (QHP) Certification for PY 2017	TSGAC Official Comments	
3.	7/27/15	Centers for Medicare and Medicaid Services	Comments on CMS-2390-P, "Medicaid and Children's Health Insurance Program (CHIP) Programs; Medicaid Managed Care, CHIP Delivered in Managed Care, Medicaid and CHIP Comprehensive Quality Strategies, and Revisions Related to Third Party Liability: Proposed Rules	TSGAC provided a series of substantive comments (26 pages); along with accompanying attachments. The TSGAC comments mirror the model template developed by a team of health care experts from the MMPC/NIHB.	
4.	5/15/15	Internal Revenue Service	Notice 2015-16 on Section 4980I — Excise Tax on High Cost Employer-Sponsored Health Coverage	TSGAC Comments in Request to Notice from IRS.	

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5.	1/14/15	Ms Tracy Parker Warren Office of Public and Intergovernmental Affairs OTGR(075F)-VA	Comments Submitted Response to Notice of TC: Sec 102 © of the Veterans Access, Choice and Accountability Act of 2014	Urge the Reports enter into agreements for reimbursement also current agreements be used and expanded where possible to speed up implementation to eligible veterans	
6.	1/12/15	CCIIO-CMS-DHHS	Comments on Draft 2016 Letter to Issuers in the Federally-Facilitated Marketplace	We are available to discuss any of the recommendations contained in the correspondence and attachment on CMS-9944-P	
7.	12/22/14	DHHS/CMS- Regulations.gov	Comments on CMS-9944- P;Notice of Benefits and Payment Parameters for 2016		
8.	12/19/14	Ms. Marilyn Tavenner,Administrator, CMS	TSGAC-TTAG letter of Request for Information on Contract Offers made by Issuers of Qualified Health Plans	Continued support and additional information for guidance on these contract offers on QHP	<b>Response received from Marilyn Tavenner, CMMS 2/2/15 to TSGAC letter dated 12/19/14</b>
9.	11/10/14	IHS Director,Dr. Y. Roubideaux	Tribal Consultation on Medicare-like Rates (MLR) Regulations and/or Guidance	Request Tribal Consultation on MLR before the IHS or CMS publish any notices of proposed rule-making or any guidance on this topic.	

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10.	11/7/14	CMS, Director, Ms Kitty Marx	Reappointment of Primary & Alternate Representative to serve on CMS Tribal Technical Advisory Committee	Appreciate collective work of the TTAG provide advice and input to the CMS	
11.	10/16/14	Sylvia Burwell, Secretary DHHS and Jacob Lew, Secretary DoTreasury	Appreciation for Recent Announcement on Exemption from Tax Penalty for American Indian/Alaska Natives	Continued partnership to improve health and welfare for Tribal citizens	
12.	9/19/14	Dr. Elaine Buckberg, DAS for Policy, Dept of Treasury	Announcement Regarding Applying for Exemption through Tax Filing	Continued collaboration to improve health and welfare of all tribal members	
13.	8/28/14	Sylvia Burwell, Secretary DHHS	IHS Tribal Self-Governance Advisory Committee Priorities and Strategic Plan	Prepared to meet and discuss issues and recommendations at your convenience	<b>Response received 12/8/14 from Sylvia Burwell, DHHS re: HHS supports efforts to increase AI/AN enrollment in Medicaid, CHIP and the Marketplace.re; CSC continue to make progress on resolving claims</b>
14.	8/25/14	Mary Wakefield, Ph.D. RN ,Administrator Health Resources & Services Administration, DHHS	Request for Tribal Consultation on 340B Drug Pricing Program	Considered attending Tribal Consultation on this matter	
15.	8/15/14	Dr. Caroyln Clancy, Interim Under Secretary Health-Veterans Affairs  IHS Director, Dr. Y.Roubideaux	Request for VA and IHS to Revisit the VA-IHS Reimbursement Agreement	Considered attending TSGAC Quarterly meeting during Oct 8-9 and discuss recommendations in greater details.	

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16.	5/23/14	DHHS Secretary, The Honorable Kathleen Sebelius	Delaying Meaningful Use Electronic Health Record Program-Stage 3	Consider our concerns and implement administrative measures extend deadlines imposed by ONC	<b>Response received 9/12/14 from Marilyn Tavenner, CMS re: HER Incentive Programs, CMS updated the hardship exception application to add another option for extreme circumstances</b>
17.	5/20/14	Mandy Cohen	Request for Action on Outstanding Issues for AI/AN under ACA	Reconsider recommendations, consult with TSGAC, TTAG and SG Tribes to address current deficiencies in enrollment	<b>Response received 6/13/14 from Mandy Cohen, MD MPH, letter sent by TSGAC dated 5/20/2014 re request for action on issues for AI/AN under ACA</b>
18.	5/20/14	DHHS Secretary, The Honorable Kathleen Sebelius	Request for Action on Outstanding Issues for AI/AN under ACA	Appeal to reconsider an administrative fix for definition of Indian under ACA	
19.	4/15/14	IHS Director, Dr. Y.Roubideaux	Response Ltr Interpreting Section 402 of the Indian Health Care Improvement Act	On-Going discussions and provide comments	
20.	3/31/14	CMS-DHHS Attn: CMS Desk Officer	CMS-3178-P; Comment on Proposed Emergency Preparedness Rule	On-Going collaboration and recommendations provided	
21.	2/25/14	CCIIO/CMS/DHHS	Comments on Draft 2015 CCIIO letter to issuers in the Federally-facilitated Marketplaces	On-Going collaboration and further discussions and recommendations	
22.	1/31/14	IHS Director, Dr. Y. Roubideaux	December 6, 2013 DTLL on Expanding the Medicare-Like Rate Cap to Non-Hospital Services	TSGAC Comments	

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23.	1/29/14	DOT, Office of Economic Policy, Dr.Elaine Buckberg	Follow-up from January 22,2014 IHS/TSGAC Quarterly Meeting	On-Going collaboration and participation in work groups establish to fashion approach implementing exemption	
24.	1/22/14	CMS/DHHS Attn: CMS-3288-N	Comments on CMS-2380-PN; Basic Health Program Proposed Federal Funding Methodology for 2015	Recommend CMS modify proposed funding formula in determine amount of federal payment to states for AI/AN enrollees	