Sonosky, Chambers, Sachse, Miller & Monkman A national law firm devoted to representing Native American interests

Tribal Self-Regulation of Health Care CASE STUDY: CHA/P Certification Board

Rebecca Patterson November 15, 2018

rebecca@sonosky.net

What Is a CHA/P?

- Community Health Aide/Practitioner (CHA/P)
 - Currently 550 CHA/Ps in 170 rural Alaska villages
 - Provide frontline care in their communities as part of the spoke and hub model of the Alaska tribal health system
 - Coordinate with itinerant providers, provides referrals
 - Go through training and receive a level: I-IV
- Related community practitioners:
 - DHAs (Dental Health Aides)
 - BHAs (Behavioral Health Aides)
- National expansion coming soon

History of the CHA/P Program in Alaska

- CHAP started in the 1960s because of
 - Tuberculosis outbreak
 - High infant mortality rates
 - High rates of injury in rural Alaska
- 1968: Alaska Community Health Aide Program recognized and received funding from Congress
- History of coordination between local IHS Area
 Office, State of Alaska and THOs

History of the CHA/P Program in Alaska

- Regional THOs eventually took over program under Title I contracts
 - Tribal initiative to develop CHAM and training centers
 - IHS involved with supervision and coordination
- 1994: IHCIA amended to direct IHS to set up a Board
- ~1996: YKHC leads charge to develop a Board and standards

History of the CHAPCB

- CHAPCB created in 1998 as part of transition from federal government control to tribal control of most Area Office functions
 - move from IHS credentialing to certification
 - wanted Board to maintain federal status, but remain tribally controlled
- Charged with formalizing the process for maintaining CHA/Ps, DHATs and BHAs training and practice standards and policies

Duties of the CHAP Certification Board (CHAPCB)

- A board of the IHS
 - appointed by the Director of the Alaska Area of the IHS, subject to final action of the Area Director
- Oversees CHA/Ps, DHATs and BHAs and serves as the governing board for those programs
- Certifies training centers and individual health aides

Legal Authority for CHAPCB

- Snyder Act, 25 USC § 13
- Indian Health Care Improvement Act,
 25 USC § 1616/
 - Incorporates S. 1790 as reported in December 2009
- Directives from US DHHS, PHS, IHS and AANHS
 - AANHS Circular 94-138
 - AANHS Circular 98-150

Support for the CHAP Certification Board

- Receives recommendations from Academic Advisory
 Committees in each of the program practice areas
 - Recommendations are advisory only unless acted on by the CHAPCB
- Receives administrative support from the Alaska Native Tribal Health Consortium (ANTHC)
- Funded by application fees

CHAP Certification Board Membership

- Each of the regional THOs that has a training site
- A site with a CHAP in the Anchorage Service Unit
- Association of CHAP Directors (a CHAP Director)
- Training centers (an instructor)
- CHA/P Association (a CHA/P)
- *AANHS Director
- *State of Alaska
- Medical Director
- Dental Academic Review Committee Rep
- Behavioral Health Director Rep

Controlling Documents

- CHAPCB Standards and procedures:
 - http://www.akchap.org/resources/chap_library/CHAPCB _Documents/CHAPCB_Standards_Procedures_Amended_ 2018-01-25.pdf
- Alaska Community Health Aide/Practitioner Manual
- Community Health Aide Basic Training Curriculum

Takeaways

- Tribal regulation through control of requirements for certification
- Participation of the State, allows Tribes to bill for services of CHA/Ps (expanded through SPA amendments)
- Innovative delivery of health care
 - Started with IHS
 - Expanded upon by THOs

Moving Forward

- IHS working on national CHAP expansion
 - https://www.ihs.gov/chap/
 - Set up a CHAP Tribal Advisory Group
 - Tribal Chair: Dr. Glorinda Segay, Navajo Nation
 - Federal Chair: Dr. Beverly Cotton
 - Meetings started in March 2018
 - Current status: waiting for IHS response to second tribal draft