

CHAP + State Plan Amendments

Montana DHHS Tribal Consultation

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Christina Friedt + Tanya Firemoon, Fort Peck Tribe CHAP
Contractors



WELCOME

Today's presentation provides the basic essentials of the Community Health Aide Program (CHAP) and focus on the State Plan Amendment process and necessity.

What is CHAP?

- CHAP is a system of **health provider education and regulatory infrastructure**. It is unique and offers a solution by providing employment opportunities and addressing critical health care needs **as directed by our Tribes**.
- CHAP implementation leverages current education programs and creates tribally led regulatory infrastructure through a certification framework at an Area level managed by an **Area Certification Board (ACB)**
- CHAP connects through the existing health care system through State licensed providers as supervisors.

Community Health Aides (CHAs)

- Primary and emergency care clinicians with close cultural ties to the communities they serve.
- Two levels of CHAs, all practice under the supervision of a licensed physician or advanced practice provider.

Behavioral Health Aides (BHAs)

- Counselors, health educators, and advocates. Addressing individual and community-based behavioral health needs, including alcohol, drug, and tobacco misuse.
- Four levels of BHAs, all work under the direct/indirect supervision of a licensed Master's level clinical supervisor.

Dental Health Aides (DHAs)

- Primary dental providers that focus on prevention and basic oral health procedures.
- Four categories of DHAs, all work under the direct, indirect, or general supervision of a licensed dentist

Early Engagement is essential

CHAP provider and education program regulation comes from Area Certification Boards

Area Certification Boards are governed by the National CHAP Board

CHAP was developed to **sit outside state regulatory environments** to give tribes and tribal health programs the ability to tailor both the education and training requirements, scope of practice, and supervision requirements of specific provider types in their communities



The Community Health Aide Program (CHAP) implementation is building a new system for educating and regulating health care providers to integrate into an existing health system. Through the design and implementation of education programs tailored to the needs of our students and health system, existing education infrastructure can be more effective for the tribal health system. Regional CHAP staff work with Indian Health Service (IHS) to create an Area-level federal regulatory structure to certify providers employed by IHS, a Tribe, or a Tribal Health Organization (THO).



What is the National CHAP Board (NCHAPB)? Brief Summary:

- The IHS CMO leads the National Community Health Aide Program Board (NCHAPB).
- This board, a permanent national IHS entity, supports Tribal and Federal Community Health Aides (CHAPs), sets minimum standards and procedures, and supervises CHAP Area Certification Boards (ACBs) in the 48 contiguous states.
- The NCHAPB can delegate authority to an ACB to represent an Area establishing or waiting for ACB recognition.
- NCHAPB members include the Chair and a representative from each of the 12 IHS Areas, either from a Federally operated or Tribally operated program.



Duties and Powers of the NCHAPB in the contiguous 48 states (in a nutshell):

- **Develop and maintain minimum standards for training, education, and supervision of health aides based on National CHAP standards**
- Review ACB eligibility upon request and recommend scope and recognition to the IHS Director
- **Oversee ACB compliance with national standards**
- Approve official forms
- Support reciprocity of qualified health aides across Areas
- Review and propose updates to standards with ACBs
- **And deny, revoke, or suspend ACB operations for non-compliance**



Ensuring Integrity:

FUNCTIONS OF AN AREA CERTIFICATION BOARD



Reviews applications of future providers



Certifies providers



Approves education programs



Addresses health inequities



Relies on the expertise and recommendations of Academic Review Committees



Public Meetings



Academic Review Committees

Subject matter experts that evaluate and make recommendations about specific CHAP disciplines.

ARCs play a crucial role in ensuring:

- Quality and relevance of academic programs
- Ensure best practices, and available technology for diagnosing, treating, and managing a particular condition are integrated into CHAP requirements.
- Providing technical expertise to ACBs



Standards and Procedures



BILLINGS ADMINISTRATIVE AREA
COMMUNITY HEALTH AIDE PROGRAM
STANDARDS, PROCEDURES & CODES
JUNE 27, 2022
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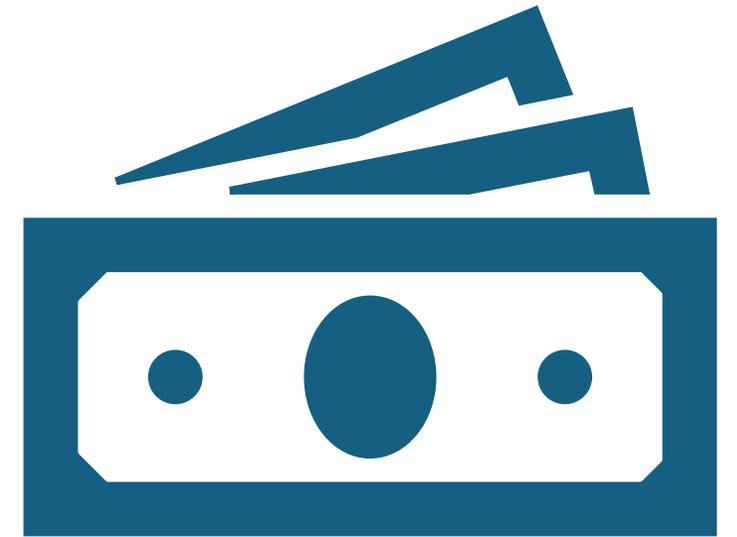
Now we know enough about
CHAP regulatory infrastructure to
be dangerous. . .

Moving on to State Plan Amendments

Sustainability of CHAP

State Plan Amendment = Medicaid Reimbursement

Medicaid Reimbursement of services provided by CHAP Providers = Program Sustainability



But Why Now?

- There are two Area Certification Boards able to certify CHAP providers
 - Billings is working on their ACB
- There are CHAP education Programs
- A tribe in Montana could hire a CHAP provider today from another clinic outside of Montana
- There are Tribes in Montana with CHAP students in training
- SPAs take time



SB 170

Montana Senate Bill 170 was signed by Governor Gianforte on April 3, 2025.

This bill, among other directed the department of public health and human services to “apply for a state plan to authorize Medicaid coverage of services provided by individuals certified in accordance with [section 2].”



CHAP SPAs are straightforward

- CMS likes things it recognizes
- Generally, CHAP SPAs are non-controversial and simple (one sentence)

Both Oregon and Washington included CHAP in section 3 of their state plan under “Other licensed providers”

Oregon also included CHAP in section 4.19B related to payment rates

State Plan Amendments (SPAs):



Oregon Health Authority (OHA) State Plan Amendment:

- OR-23-0015
- Subject of Amendment, adding “Certified Indian Health Service Community Health Aide Program providers into the **other licensed providers section of the state plan**”.
- CMS Approval Date: 08/07/2023
- Approved SPA Language:**
 - “Certified Indian Health Service Community Health Aide Program providers, supervised by a Licensed Health Care Professional.”

Washington Health Care Authority (WHCA) State Plan Amendment:

- WA-24-007
- Subject of Amendment, adding “Community Health Aide Providers (CHAP)”.
- CMS approval date: 06/21/2024
- Approved SPA Language:**
 - “Certified Community Health Aide Program (CHAP) providers, supervised by any licensed practitioner covered under this benefit within their scope of practice as defined under state law”.

We've been in a decade long ceremony.....

As our tribal communities continue to thrive, CHAP-focused colleagues continue to discover new methods of bonding education, traditional practices, student and provider recruitment and retention, quality of care, and system sustainability. The team has remained nimble in order to pivot with the recent National movement and newest Circular.

We will continue to:

- hold space – be in the moment
- create safe space for conversation for our leadership and community to guide this work
- removing barriers for training and education

As CHAP stewards, we will continue to carry the community voices and tribal imprint to ensure a future that respects the strength and resiliency of our people.





Thank You!
Questions?

Fort Peck Tribal Health Service Unit Director

Dennis Four Bear dennis.fourbear@fortpecktribes.net

CKF Consulting

Christina Friedt ckfconsulting@outlook.com

Fort Peck Tribe & Northwest Portland Area Indian Health Board

CHAP Contractor

Tanya Firemoon tlfiremoon@yahoo.com

