

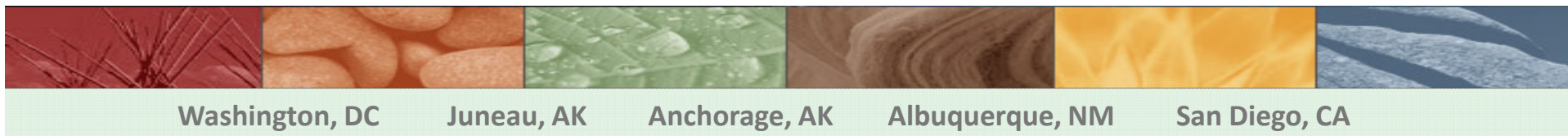
Sonosky, Chambers, Sachse,  
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*A national law firm devoted to representing  
Native American interests*

**The Community Health Aide Program and  
Dental Health Aide Certification  
Opportunities for Tribal Health  
National Indian Health Board Public Health Summit**

**Myra M. Munson, J.D., M.S.W.  
April 1 and 2, 2014**

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Washington, DC

Juneau, AK

Anchorage, AK

Albuquerque, NM

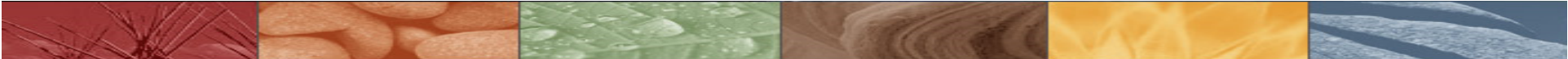
San Diego, CA

# History of Community Health Aide Program

The Community Health Aide (CHA) Program was developed in the 1950s in response to a tuberculosis epidemic, high infant mortality, high rates of injuries in rural Alaska, and other health concerns. In 1968, the CHA Program received formal recognition and congressional funding.

From its inception the CHA Program has had a long history of cooperation and coordination among the federal and state governments, and tribal health programs. *See, "Chronology of the Alaska Community Health Aide Program,"* Walter Johnson M.D., 1992 (<http://jukebox.uaf.edu/CHA/htm/history.htm>)

The cooperation extends to payment by the State Medicaid program for services provided by CHAs, including dental health aides and therapists. *See, AK SPA Attached Sheet to Attachment 3.1A, 4.b(4) (certified DHA), 5.a (CHA III, IV, and CH Practitioner).*

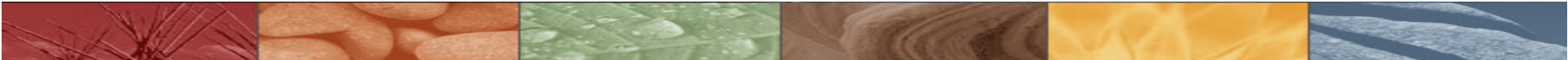


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## History (continued)

**In 1992, the Indian Health Care Improvement Act of 1974, Pub. L. 94-437 (IHCIA), was amended to provide for the CHA Program under the authority of the Snyder Act of 1921. It required the IHS to provide training for CHAs, develop a curriculum (actually in place since 1976), and establish a CHA Program Certification Board. IHCIA Section 119, 25 U.S.C. § 1616/.**

**In 1998, the Alaska Area Native Health Service (AANHS), in collaboration with the Alaska Native Health Board (ANHB), established the Community Health Aide Program Certification Board (CHAPCB), which adopted *Standards and Procedures* for the qualifications, training and continuing education, supervision, and practice of CHAs.**



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## History (cont.)

In November 2002, the *Standards and Procedures* were amended to incorporate standards for certification of dental health aides (DHAs), including dental health aide therapists (DHATs).

Only the DHATs generated push back from the local and national trade associations.

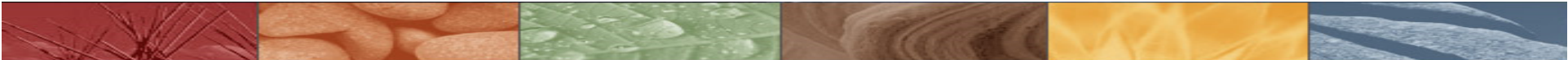
In 2010, the IHClA was amended by section 10221(a) of Pub. L. 111-148. Sec. 119, 25 U.S.C. § 1616l, was amended to allow nationalization of the CHA Program, subject to certain limitations, and to exclude certain procedures from the scope of practice of DHATs.

# What about Tribes Outside Alaska

## 25 U.S.C. § 1616/(d) Nationalization:

The IHS may establish a national CHAP provided:

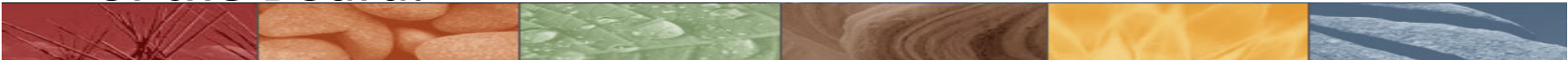
- The funding for the Alaska CHAP may not be reduced to support it;
- DHAT may not be included unless the tribe wants them AND is located in a State (other than Alaska) in which the use of DHAT services or midlevel dental health provider services is authorized under State law to supply such services in accordance with State law.



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# Certification Board

- The Alaska CHAPCB is appointed by the Alaska Area Director of the Indian Health Service (IHS).
- The members of the CHAPCB include tribal representatives, a representative of the Alaska Department of Health and Social Services, the Chief Medical Officer for AANHS, and a licensed dentist among others.
- *Standards and Procedures* were adopted by the Board in 1998. Amendments adopted by the Board are subject to review by the IHS Area Director.
- Certification of a CHA, including DHAs and DHATs, is granted by the IHS Area Director upon recommendation of the Board.



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# Basic Certification Qualifications

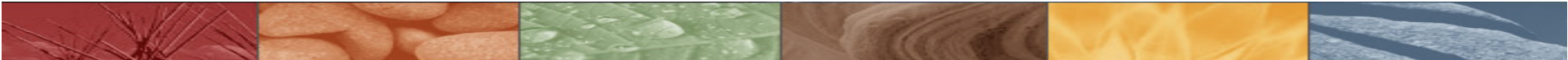
## **A certified CHA (including DHA & DHAT) must:**

- **Be an employee of IHS or a tribe or tribal health program;**
- **Furnish evidence of not having engaged in conduct that is grounds for imposing disciplinary sanctions;**
- **Have satisfactorily completed all required training and preceptorships;**
- **Practice only within the scope of practice and certifications granted by the Board, except during approved training for the next level of certification;**
- **Practice only under the supervision and day-to-day direction of specified individuals who are employed by or under contract with IHS or a tribal health program;**
- **Meet all continuing education requirements; and**
- **Renew the certification on every two years.**

# Standards of Training and Practice

For each certification available to a DHA, including DHATs, the *Standards and Procedures* specify:

- level of supervision that is required;
- list of minimum competencies that must be demonstrated and maintained;
- training that must have been satisfactorily completed, including the subject matter of each required course, hours of didactic instruction, hours or number of clinical encounters;
- preceptorship requirements, which include a list of the procedures, and number of each, that must have been satisfactorily completed, and the additional hours of relevant work experience;
- continuing education requirements.



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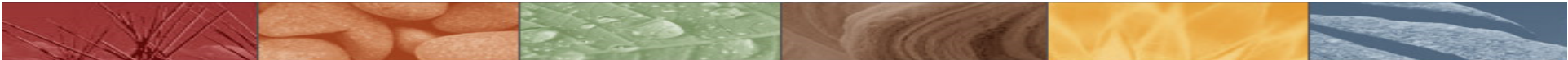


# Dental Academic Review Committee (DARC)

**All training curriculum and continuing education courses must be approved by the CHAP Certification Board.**

**Approval will only be granted if minimum content requirements are satisfied AND the curriculum has been reviewed and recommended by the DARC.**

**DARC is comprised of dentists involved in development of training, operation of a tribal dental program, and actively engaged in clinical practice; a dental hygienist, and others involved in CHA/P academic review, training and supervision.**



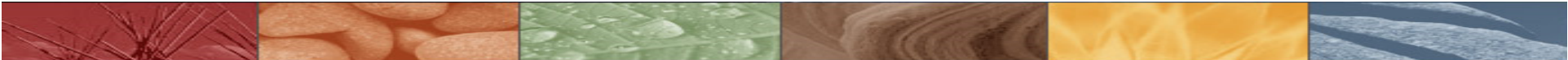
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# Principles

**The scope of practice of each certified DHA or DHAT is limited.**

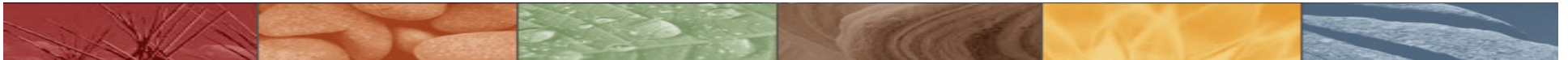
**THE STANDARD OF PRACTICE WITHIN THE SCOPE IS THE SAME AS FOR A LICENSED DENTIST.**

**All practice is subject to the specific authorization of the supervising dentist through direct supervision or standing orders.**



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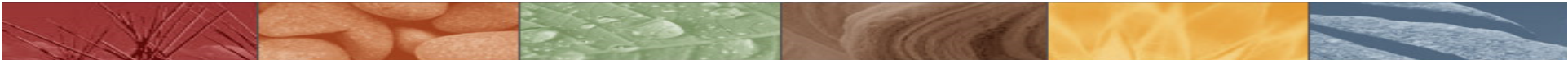
# NOTES AND QUESTIONS



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# Myra M. Munson, J.D., M.S.W.

Ms. Munson is a partner in the Juneau office of Sonosky, Chambers, Sachse, Miller & Munson LLP, which specializes in representing tribal interests in Alaska and throughout the United States. She earned her bachelor's degree from the University of Alaska Fairbanks in 1972 and her law degree and master's degree in social work with honors from the University of Denver in 1980. After serving as Alaska Commissioner of Health and Social Services from 1986 to 1990, Ms. Munson joined the Sonosky Law Firm LLP where her practice has emphasized self-determination and self-governance, the Indian Health Care Improvement Act (IHCIA), Medicaid and other third-party reimbursement issues, and other health program operations issues. She was a technical advisor to the IHCIA National Steering Committee for over 10 years; assisted in drafting and editing substantial sections of the reauthorization; and testified before the Senate Committee on Indian Affairs. She assisted in the structuring of the Alaska Community Health Aide Program Certification Board, was the principal drafter of the Board's *Standards and Procedures*, and continues to advise the Board. Ms. Munson is also a member of the National Indian Health Board Medicare & Medicaid Policy Committee, and a technical advisor to the Centers for Medicare and Medicaid Services Tribal Technical Advisory Group. She has conducted extensive training on the IHCIA amendments and Affordable Care Act since their passage and serves as a consultant to the National Indian Health Board with regard to training on and implementation of these new laws. In 2003, Ms. Munson was given the Denali Award by the Alaska Federation of Natives. and in 2009 the Healthy Alaska Native Foundation honored her with its President's Award.



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