



Tribal Technical Advisory Group



To the Centers for Medicare & Medicaid Services

c/o National Indian Health Board | 50 F Street NW | Washington, DC 20001 | (202) 507-4070 | (202) 507-4071 fax

September 16, 2026

The Honorable Mehmet Oz, MD
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Submitted via [medicaid.gov](https://www.medicaid.gov)

**Re: State of Minnesota Department of Health and Human Services Section 1115
Waiver Application**

Dear Administrator Oz:

On behalf of the Centers for Medicare and Medicaid Services (CMS) Tribal Technical Advisory Group (TTAG), I write today to support the State of Minnesota Department of Health and Human Services Mino Bimaadiziwin-Wiċhózani (Mino) Section 1115 waiver application. The Mino waiver represents an important opportunity for the Administration to continue supporting and recognizing culturally appropriate models of care that have long contributed to the health and wellness of American Indian and Alaska Native (AI/AN) people. As such, TTAG urges CMS to promptly approve the application.

The United States has a legal and political relationship with Tribal Nations that establishes a unique government-to-government relationship. Arising from this relationship is a federal trust and legal obligation to provide health care services to "...ensure the highest possible health status for Indians and urban Indians and to provide all resources necessary to effect that policy."¹

The federal trust relationship was respectfully established in the US Constitution and has been continually recognized by the US Congress and upheld through numerous court decisions, executive actions, and other federal policy. Medicaid is one of the principal mechanisms through which the federal government helps fulfill its trust responsibility to provide health care services to AI/AN people.

Medicaid programs play an essential role in supporting the Indian health system and supplement chronically underfunded Indian Health Service appropriations. Section 1115 demonstrations have historically given states and Tribal governments opportunities to

¹ 25 U.S.C. § 1601(2).

CMS TTAG Letter to CMS Administrator Oz
Re: State of Minnesota Department of Health and Human Services Section 1115
Waiver Application
September 16, 2026
Page 2 of 3

ensure the Federal government, states, and Tribal Nations work in a government-to-government relationship to provide quality health care for all AI/AN people. These demonstration waivers provide opportunities for Tribes and Urban Indian Organizations to develop innovative approaches that improve access to care, enhance health outcomes, and better meet community needs while maintaining the integrity of the Medicaid program.²

The Mino waiver represents an important opportunity for the Administration to continue supporting culturally appropriate models of care and explore innovative care delivery models that decrease utilization of other services and improve health outcomes in the communities that access and maintain them.

Traditional healing practices have sustained Tribal Nations and AI/AN communities since time immemorial. While approaches vary among our communities, traditional healing and use of traditional medicines incorporate practices such as sweat lodges, talking circles, smudging, traditional ceremonies, cultural teachings, and the gathering, preparation, and use of traditional medicines and foods as medicine, including Manoomin, or wild rice. For many Anishinaabe communities, the traditional gathering of wild rice is both a sacred cultural practice and a vital source of nourishment, connecting health to land, water, ceremony, family, and Tribal sovereignty. These practices are often incorporated with Western medicine. These practices are often incorporated with Western medicine. Grounded in traditional knowledge systems, these practices support a holistic approach to health by helping individuals reconnect with their cultural identity, strengthen community connections, and restore balance between mind, body, and spirit.

By creating pathways for Medicaid coverage of traditional healing services, including the gathering and use of traditional foods, Minnesota is advancing an innovative model that aligns with Secretary Kennedy's Make America Healthy Again priorities and the Administration's broader federal nutrition policy emphasis on whole, nutrient-dense foods as a foundation for health.

This approach further supports the federal government's fulfillment of its trust and treaty responsibilities, respects Tribal sovereignty, and strengthens health care delivery in a manner responsive to the needs of AI/AN people. We urge you to consider and approve this application promptly.

² 25 U.S.C. § 1601 et seq.

CMS TTAG Letter to CMS Administrator Oz
Re: State of Minnesota Department of Health and Human Services Section 1115
Waiver Application
September 16, 2026
Page 3 of 3

Sincerely,

A handwritten signature in black ink that reads "W. Ron Allen". The signature is fluid and cursive, with the first name "W." and last name "Allen" clearly legible.

W. Ron Allen, CMS TTAG Chair
Chairman/CEO, Jamestown S'Klallam Tribe

Cc: Mark Cruz, Director, Indian Health Service, Senior Advisor to Secretary Kennedy
Dan Brillman, Director, CMSC, Deputy Administrator
Rachel Ryan Pedersen, Acting Director, DTA