

January 31, 2018

Representative Paul Seaton
Representative Neal Foster
Co-Chairs, House Finance Committee
State Capitol Room 505
Juneau AK, 99801

Re: HB 215: Public Health Fees

Dear Representatives Seaton and Foster,

We are submitting this letter in support of HB 215 (version O) Public Health Fees.

The Alaska State Hospital and Nursing Home Association (ASHNHA) represents Alaska's hospitals and skilled nursing facilities. Our members provide a variety of critical health care services in their communities, from inpatient acute care and emergency services to primary care and behavioral health.

We recognize the serious budget situation facing Alaska and the need to look to all sides for revenue to support state services. We believe it is appropriate for the Division of Public Health to explore when it is possible to charges fees for services provided.

Last spring, we testified against the legislation and expressed our concern about the broad latitude being given to the Division to impose user fees and recommended that stakeholder engagement be part of the process. During the interim, we worked with the sponsor on language to ensure stakeholders would have an opportunity to provide input prior to the regulatory process. This language is included in the CS for HB 215 – version O.

We appreciate the willingness of the sponsor to incorporate our recommendations in the legislation and offer our support if the proposed Section 3 is included.

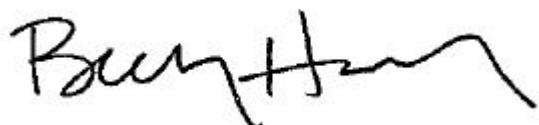
We support allowing public health more latitude to charge user fees, when appropriate and reasonable, and believe that stakeholder involvement is important to the process. In our experience, the regulatory and budget processes alone are insufficient to provide appropriate oversight to what fees the division could impose and what compliance programs they could build up with this new revenue source. Once the regulation process is underway there is no opportunity for meaningful dialogue on the impact of what is being proposed. We realize public comment is always an option, but this is too late in the process.

We support requiring a stakeholder process on the reasonableness of fees prior to the regulation process and feel this will strengthen the effort to charge appropriate user fees.

We believe that public health services are a critical part of our health system and will never be sustainable based on user fees alone. We advocate for continued funding for public health functions to protect vulnerable populations and ensure healthy communities. We want to be sure public health services continue even when no user fees are available to support them.

Thanks for working with us to improve this legislation.

Sincerely,



Becky Hultberg
President/CEO