

# [NCUIH Submits Comments to IHS on the OUIHP 5-Year Strategic Plan](#)

Category: Policy Blog

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On January 28, 2022, the National Council of Urban Indian Health (NCUIH) [submitted comments](#) to the Office of Urban Indian Health Program (OUIHP) and the Indian Health Service (IHS) regarding the upcoming 5-Year Strategic Plan (Plan). These comments were submitted in response to a December 3, 2021, [Dear Urban Leader letter](#) seeking input for recommendations and in consultation with UIOs to address needs and areas for improvement in the new Plan.

## **Background**

In 2017, the IHS developed an OUIHP Strategic Plan 2017-2021, pursuant to the Consolidated Appropriations Act, which described what the Agency hoped to achieve over the next 5 years. The 2017-2021 Plan was based on the participation and feedback received from UIO Leaders, IHS staff, and other stakeholders. In fiscal year (FY) 2022, IHS expects to evaluate the existing OUIHP Strategic Plan and to develop a new Plan. According to the OUIHP, the new Plan will include goals, objectives, strategies, and performance measures, based on input from UIO Leaders, partners, and external stakeholders.

## **NCUIH's Role**

NCUIH provided several comments and recommendations for the Plan. These comments were based on NCUIH's consultations with UIOs, the IHS Urban Confer held on December 16, 2021, and NCUIH's subject matter expertise.

In its comments, NCUIH applauded OUIHP for its efforts to meet the goals and objectives of the 2017-2021 Plan, including Objective 2.2 which it successfully accomplished. However, NCUIH noted that there remains significant unmet goals and objectives from the 2017-2021 Plan which need continued attention and action in the upcoming Plan. NCUIH supports keeping the 2017-2021 Plan's goals and objectives in the Plan, except for Objective 2.2. which was completed. Those goals and objectives are listed below. NCUIH also urged OUIHP to continue to build on and update the 2017-2021 Plan's goals and objectives in the Plan to further meet the Plan's stated mission and vision.

- Goal 1: Support Currently IHS-Funded UIOs' Efforts to Address the Key Challenges they Identified for Improving and Expanding Access to Care for Urban Indians.
  - Objective 1.1: Support UIOs' efforts to diversify funding and increase third-party reimbursements to ensure UIO sustainability
  - Objective 1.2: Support UIOs' efforts to attract and retain skilled, culturally competent health service providers
  - Objective 1.3: Increase awareness and actively seek support for health care needs of Urban Indians
  - Objective 1.4: Strengthen the capacity of UIOs to work as a community to improve knowledge sharing
- Goal 2: Increase OUIHP's Administrative Capacity
  - Objective 2.1: Build capacity for OUIHP to transfer administration of the former NIAAA

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- Objective 2.2: Lay the groundwork for performance-based oversight, both within the IHS and for the IHS-funded UIOs
- Objective 2.3: Leverage OUIHP staff capacity by maximizing partnerships and resources. Ensure the IHS has available staff to perform the roles of OUIHP and support the IHS mission regarding Urban Indian health

Additionally, NCUIH recommended the following items be incorporated into the goals and objectives of the Plan:

- Improved data accuracy
- Modernizing Health information Technology
- Establishment of specific metrics by which to measure OUIHP's progress towards fulfilling the Plan
- Improved Area Office consistency
- Increased support for behavioral health services, including for health providers
- Support for Community Health Representatives (CHRs) at UIOs as authorized in the Indian Health Care Improvement Act
- Establishment of goals and objectives to support efforts to extend the Community Health Aide Program to UIOs
- Inclusion of traditional healing practices as an allowable billing expense
- Development of a fair and equitable UIO All-Inclusive Rate or extension of the existing IHS All-Inclusive Rate to UIOs
- Incorporation of Title V Contract improvement suggestions from UIOs
- Improved budget planning with respect to UIOs
- Modified targets and adaptive planning for unforeseen events such as the COVID-19 pandemic

NCUIH further recommended that the OUIHP and IHS schedule an annual performance plan report. NCUIH advised OUIHP to incorporate meaningful metrics into the Plan which will permit it to report useful quantitative analysis of its progress towards accomplishing the goals and objectives included in the Plan. NCUIH believes that any performance plan report should be made publicly available.

NCUIH also expressed its appreciation to OUIHP for initiating a new Plan proactively by using savings from salaries and for fulfilling its trust responsibility and statutory mandate to confer with UIOs by proactively seeking to collaborate with UIOs on the development of the Plan. NCUIH stressed that input from UIOs is vital for the IHS and its operating divisions to effectively gather comprehensive feedback, share critical information, and build mutual trust, in addition to being required by the Indian Health Care Improvement Act (IHCIA).

NCUIH strongly believes that the Plan is an important vehicle to articulate leadership priorities, provide direction for program management functions, engage external partners and entities, and measure OUIHP's progress towards meeting the goals and objectives contained in the Plan. NCUIH will continue to participate in the development of the Plan and inform UIOs of upcoming opportunities to provide comments and participate in Urban Confers. NCUIH encourages UIOs submit any comments at future opportunities which they believe will be helpful in the development of the Plan.