

# **NCUIH Submits Comments to IHS on Urban Indian Organization On-Site Review Manual**

Category: Policy Blog

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On April 12, 2022, the National Council of Urban Indian Health (NCUIH) submitted [written comments](#) and recommendations in response to the Indian Health Service's (IHS) February 11, 2022 [notice and request for comment](#) on the information collection titled "Urban Indian Organization On-Site Review," Office of Management and Budget Control Number 0917-00XX. NCUIH requested that the on-site review manual be updated regularly, that IHS provide UIOs with a consolidated list of required documents prior to the on-site review, and that IHS enable UIOs to use existing administrative or site visit data in meeting the requirements of the Manual. NCUIH also encouraged the Office of Urban Indian Programs (OUIHP) to host an Urban Confer to personally hear UIO input on and experience with the on-site review process.

## **IHS On-Site Review Manual**

The [Indian Health Care Improvement Act](#) (IHCIA) requires the Secretary of Health and Human Services, through the IHS, "to conduct an annual onsite evaluation of each urban Indian organization which has entered into a contract or received a grant under section 1653," of the IHCIA. As part of this statutorily mandated process the IHS Office of Urban Indian Health Programs (OUIHP) drafts and publishes the [Manual](#), which is used to accomplish the annual review of UIOs.

In the nine years that the current Manual has been in use, UIOs have experienced significant changes, including adapting to the COVID-19 pandemic, and relevant standards of national healthcare accrediting organizations like the [Association for Ambulatory Health Care \(AAAH\)](#) have changed. Accordingly, NCUIH submitted comments, drawn directly from UIOs' experience with the Manual and the annual review process, to inform the IHS on necessary areas of modification in the Manual. NCUIH's comments also included general recommendations concerning the annual review process.

## **NCUIH's Recommendations to IHS**

In its comments, NCUIH made the following requests, and recommendations based on NCUIH's consultations with UIOs and NCUIH's subject matter expertise:

- Update the Manual regularly and as needed to remain consistent with other relevant accreditation processes
- Provide greater flexibility in the Manual to accommodate diverse UIO program/facility goals and services
- IHS to provide a consolidated list of requirement documents to UIOs prior to the on-site review
- Ensure that UIOs can use existing administrative or site visit data in meeting the requirements of the Manual

In addition to the preceding recommendations regarding the Manual itself, NCUIH also requested that OUIHP host an Urban Confer with UIOs to learn about their experiences with the on-site review

process. NCUIH also submitted the following general recommendations concerning the annual review process for consideration:

- Provide a timeline for processing information collected in the annual review process
- Improve overall review by ensuring reviewers are licensed medical providers
- Improve instructions on the limited annual waiver process

NCUIH looks forward to an updated On-Site Review Manual that will provide valuable information for UIOs and IHS. NCUIH will continue to monitor development and revision of the On-Site Review Manual and inform UIOs of pertinent information.