

[NCUIH Submits Comments to the Department of Veterans Affairs on a New Medical Residency Pilot Program](#)

Category: Policy Blog

written by Adrienne Elliott | August 22, 2022

On July 5, NCUIH submitted comments to the U.S. Department of Veterans Affairs (VA) on the Pilot Program on Graduate Medical Education and Residency (PPGMER). Congress authorized this program under Section 403 of the VA Mission Act of 2018, which sought to provide high-quality, culturally sensitive healthcare options by expanding veterans' access to medical care and enabling veterans to seek quality healthcare outside of VA facilities. Placement of residents in UIOs through this program is essential to building a highly trained, culturally competent medical workforce to provide equitable access to high-quality healthcare for the estimated 67% of AI/AN veterans living in urban areas.

Recommendations

NCUIH provided the following recommendations for implementation of the PPGMER that supports AI/AN veterans:

- **Add UIOs as covered facilities consistent with legislative intent and flexibility provided under Section 403 of the Mission Act.**

Listing UIOs as covered facilities will help VA ensure that it carries out Congress' intent to expand veterans' access to medical care and enable veterans to seek quality health care outside of VA. NCUIH estimates that 67 percent of the veteran population identifying as AI/AN alone lives in metropolitan areas. UIOs are particularly well placed to help VA meet the needs of AI/AN veterans living in urban areas. UIOs fill the gap to ensure all AI/AN veterans have access to critical healthcare options, particularly amid a global pandemic that has disproportionately impacted AI/AN communities.

- **Consider a consortium for residence focusing on the Indian Health Service, Tribal, and Urban (I/T/U) system.**

NCUIH recommends extending eligibility criteria for covered facilities to consortia of IHS, Tribal, and UIO (I/T/U) healthcare facilities under Section 403(a)(2)(F) of the Mission Act. The VA, IHS, and Tribal partners have achieved significant success through joint workgroups on increasing care coordination, health care services, and reimbursement for training and cultural competency for eligible Veterans. While those partnerships are successful, many AI/AN veterans are still not being served as noted in a [2020 VA Report](#), which found that 7.4 percent of AI/AN veterans lack health insurance compared to 2.9 percent of non-AI/AN veterans. Residency consortia represent a unique opportunity to train physicians on the intricacies of the Indian healthcare system and the provision of culturally sensitive health services across the I/T/U system.

- **Establish two additional consideration factors for placement of residents that consider the provision of culturally sensitive healthcare and ongoing staffing shortages in facilities that provide healthcare to underserved veteran demographics, including AI/ANs.**

UIOs fill an essential gap by providing culturally sensitive and community-focused care options to AI/AN veterans with shorter wait and travel times. Even in cities that have greater numbers of providers serving AI/AN veterans, there is no guarantee that these providers will be culturally competent. Despite their essential role in the healthcare of AI/AN veterans across the nation, UIOs have long faced understaffing issues that reduce the number of patients each facility can serve. UIOs have frequently expressed their inability to retain or hire staff due to their inability to pay competitive salaries. Medical residents at UIOs have the potential to dramatically increase healthcare options for AI/AN veterans and their families.

- **Utilize the VA Tribal Advisory Committee in the review process for regulations that support the VA PPGMER prior to publication.**

The [Advisory Committee](#) provides guidance on all matters related to tribes, tribal organizations and AI/AN veterans. Inclusion of the Committee in regulatory review processes for the PPGMER would demonstrate the VA's commitment to the United States' [national policy](#) "to ensure maximum Indian participation in the direction of health care services so as to render the persons administering such services and the services themselves more responsive to the needs and desires of Indian communities."

We will continue to monitor ongoing implementation of the VA PPGMER and provide updates on how the program impacts urban Indian communities.

[Link to resource.](#)