

NCUIH Requests IHS Support Interoperability, Reimbursement for Health IT Modernization

Category: Policy Blog

written by Elijah Allen | August 10, 2023

On June 9, 2023, the National Council of Urban Indian Health (NCUIH) submitted comments to the Indian Health Service (IHS) on Health Information Technology (HIT) Modernization in response to the February 6, 2023 joint [Dear Tribal Leader and Urban Indian Organization Leader letter](#) and the May 5, 2023 Tribal Consultation and Urban Confer on IHS HIT Modernization Resources. In its comments, NCUIH incorporates [previous comments](#) to IHS regarding the HIT modernization and Resource and Patient Management System (RPMS) replacement and again notes that the inclusion of urban Indian Organizations (UIOs) in the HIT Modernization process is consistent with, and required by, the federal government's trust responsibility and the Indian Health Care Improvement Act and is also sound public health policy.

Recommendations

In its comments, NCUIH made the following specific requests, and recommendations to IHS:

- Incorporate necessary new capabilities in the modernized Electronic Health Record (EHR) solution.
 - Ensure that the new EHR contains the full suite of EHR Capabilities.
 - Supports the unique interoperability needs of UIOs by ensuring that the modernized EHR is either a complete EHR or a modular EHR that a UIO will be able to upgrade as it creates demand for new capabilities.
- Develop a timeline for IHS, Tribal, and UIO (I/T/U) facilities to use as a planning base to prepare for the transition to a new system and develop uniform training packages to assist I/T/U facilities in training their staff members on the new EHR.
- Take all necessary and practicable steps to secure funding for direct reimbursement of Tribal and UIO facilities for the cost of commercial off-the-shelf (COTS) EHR systems.

Background on NCUIH Work on IHS Health IT Modernization

NCUIH has submitted several [written comments](#) to IHS on HIT Modernization. NCUIH also [submitted written testimony](#) to the House Appropriations Subcommittee on Labor, Health and Human Services, Education, and Related Agencies regarding the Fiscal year (FY) 2024 funding for UIOs in which NCUIH requested increased funding for EHR Modernization. Specifically, NCUIH requested support for the IHS' transition to a new EHR system for IHS and UIOs by supporting the President's budget request of \$913 million in FY 2024 appropriations.

- [NCUIH comments to IHS on HIT Modernization \(April 8, 2023\)](#)
- [NCUIH comments to IHS on Resource and Patient Management System Replacement and Health Information Technology Modernization Focus Groups \(June 23, 2023\)](#)