NCUIH Requests Inclusive Governance and Equitable Cohort Selection for Urban Indian Organizations in IHS' Health Information Technology Modernization Efforts

Category: Policy Blog written by Alex Sampson | July 9, 2024

On March 7, 2024, and June 7, 2024, the National Council of Urban Indian Health (NCUIH) submitted written comments to the Indian Health Service (IHS) Director, Roselyn Tso, regarding the IHS' January 18, 2024, Dear Tribal Leader and Urban Indian Organization Leader letter (DTLL/DULL) about the February 8, 2024, and May 9, 2024, Tribal Consultation and Urban Confer (TC/UC) sessions regarding Health Information Technology (HIT) Modernization. In its comments, NCUIH requested that HIT Modernization governance be inclusive of urban Indian organizations (UIOs) by ensuring Domain Groups reflect the scope of facility types, and that the cohort selection process is equitable by ensuring that cohort selection equally prioritizes all facility types.

NCUIH's Requests

The purpose of the February 8 TC/UC session was for IHS to receive feedback from Tribes and UIOs concerning the HIT Modernization Enterprise Collaboration Group (ECG). The ECG will be a user-focused body that will inform system configuration in clinical and administrative areas. It will review preferred, evidence-based practices and recommendations for operational aspects of the EHR implementation and deployment. IHS stated that one of the purposes of the ECG is to ensure users of the enterprise EHR drive the configuration of the system that they will use for patient care. It will also engage Tribes and UIOs and their users in enterprise EHR management. Within the ECG there will be Domain Groups which will be multi-disciplinary bodies comprised of EHR users from IHS, Tribal health centers and UIOs (I/T/U) and will be forums for clinical and business subject matter experts to make EHR design and configuration recommendations on behalf of the end users the represent.

For the presentation slides from the February 8 TC/UC session, please <u>click here</u>.

In its comments to this urban confer, NCUIH requested IHS:

- Ensure all UIO facility types are represented in the ECG Domain Groups
- Encourage consideration of interoperability by the ECG either through existing Domain Groups or a new Domain Group
- Ensure Tribal and UIO representation on the ECG Executive Committee
- Clarify expectations, scope, and outcomes for Domain Groups

The purpose of the May 9 TC/UC session was for IHS to receive feedback from Tribes and UIOs concerning HIT Modernization deployment and cohort planning. IHS presented on the proposed timeline for deployment implementation pathways and approach, and the steps Tribes and UIOs can take to prepare for implementation at their individual sites. IHS will begin the HIT Modernization process by first having implementation occur at IHS pilot sites and then begin implementation at cohorts using the lessons learned from pilot sites. The cohorts will be groups of facilities selected for

simultaneous system implementation.

For the presentation slides from the May 9 TC/UC session, please <u>click here</u>.

In its comments to this urban confer, NCUIH requested IHS:

- Clarify the cohort identification process
- Ensure IHS accounts for challenges related to operational and financial costs
- Develop training materials for I/T/U facilities to use as a planning base to prepare for transitioning to a new Electronic Health Record (EHR)
- Ensure IHS address data integration and migration process for a new EHR

NCUIH Advocacy on HIT Modernization

NCUIH has previously submitted several comments to IHS on HIT Modernization:

- <u>NCUIH Submits Comments to IHS on Health Information Technology Modernization</u> (April 20, 2022)
- NCUIH Submits Comments to IHS on Resource and Patient Management System Replacement and Health Information Technology Modernization Focus Groups (June 3, 2022)
- NCUIH submitted comments to IHS regarding HIT Modernization: Preparing for Change (April 7, 2023)
- NCUIH Requests IHS Support Interoperability, Reimbursement for Health IT Modernization (June 9, 2023)
- NCUIH submitted comments to IHS regarding HIT Modernization Leaders Engaging in Governance (September 1, 2023)

NCUIH also <u>submitted written testimony</u> 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 will continue to closely follow IHS's progress and policies with HIT Modernization.

Background on IHS HIT Modernization

During the November 8, 2023, Tribal Consultation and Urban Confer on HIT Modernization, IHS <u>announced</u> that it selected General Dynamics Information Technology, Inc. (GDIT) to build, configure, and maintain a new IHS enterprise Electronic Health Record (EHR) system utilizing Oracle Cerner technology. The new EHR will replace the Resource and Patient Management System.

For more information about HIT Modernization implementation, please <u>click here</u>.