

NCUIH December Policy Update: Legislative, Agency, and IHS Developments

Category: Policy Blog

written by NCUIH | December 18, 2025

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NEW: Strategy Guide Release – Strategy 1: Strengthening Health Care Access for Urban American Indian and Alaska Native People



This month, NCUIH released Strategy 1 of our new multi-part Strategy Guide series designed to support Urban Indian Organizations in delivering high-quality, culturally grounded health care. [Building on our Investing in Wellness: Financing Strategies for Behavioral Health in Indian Country](#) work, Strategy 1 outlines practical ways to strengthen Medicaid reimbursement for behavioral health services and expand sustainable financing options that support prevention, treatment, and recovery efforts at UIOs

Explore Strategy One Material and Resources for UIOs: [Visit the NCUIH Website](#)

Government Shutdown Ended, Government Funded through End of January

On November 12, Congress passed a spending package keeping FY 2025 funding through January 30, 2026.

- SDPI funded at \$53.15 million through January.
- Enhanced ACA subsidies were not extended.
- The Continuing Resolution (CR) reversed all Reduction In Force (RIF) actions taken since October 1 and prevents further RIFs during the CR period.

→ **Go Deeper:** [Link to NCUIH analysis.](#)

NCUIH in Action



NCAI 2025 Annual Convention & Marketplace

NCUIH President Walter Murillo co-chaired the Health Subcommittee. Health resolutions that passed included:

- UIO inclusion in Medicaid 1115 waivers

- 15% HHS Tribal set-aside
- Protecting IHS in Medicaid reforms
- Extending FEHB to Tribal retirees
- Safeguarding AI/ANs in OBBBA
- Codifying HHS Tribal advisory committees
- Preserving Medicaid reimbursement rates
- Supporting Native youth leadership in substance-abuse prevention

NCUIH also participated in:



- **December 4** - Pharmaceutical Research and Manufacturers of America Annual Holiday Partner Celebration - Connecting with health sector partners and stakeholders.



- **December 9-** Partnership for Medicaid End-of-Year Meeting – Strengthening collaboration with coalition members and contributing to shared Medicaid policy priorities affecting Urban Indian Organizations.



- **December 11** - NCUIH with Rep. Adelita Grijalva (AZ-07) at the House Natural Resources Subcommittee on Indian and Insular Affairs hearing on Modernizing the Implementation of 638 Contracting at the Indian Health Service.

NCUIH Comment Submission on Indian Health Service Health Information Technology Modernization

NCUIH Comment Submission on Indian Health Service Health Information Technology Modernization

- **Background:** NCUIH submitted comments requesting clarity on 24-hour technical support, functionalities of the Patients at the Heart electronic health record, documentation pathways for Traditional Healing, and continued engagement with Urban Indian Organizations.
- **NCUIH recommended:** Ongoing consultation and transparent implementation planning.

NCUIH Request for Urban Indian Organization Exemption from 340B Rebate Pilot

- **Background:** NCUIH submitted a formal letter requesting the Health Resources and Services Administration to exempt Urban Indian Organizations and Indian Health Care Providers from the proposed 340B Rebate Model Pilot due to financial and administrative burdens.
- **NCUIH recommended:** Full exemption for the Indian Health Service, Tribal, and Urban Indian health system.

Indian Health Service Agency Realignment Tribal Consultation and Urban Confer



February 9, 2026 – Indian Health Service Agency Realignment Tribal Consultation and Urban Confer

- **Background:** The Indian Health Service is gathering Tribal and Urban Indian Organization feedback on its proposed organizational realignment.
- **What's Next:** Written comments are due February 9, 2026, and may be submitted through the Indian Health Service consultation portal or emailed to urbanconfer@ihs.gov.

UIO Important Dates:

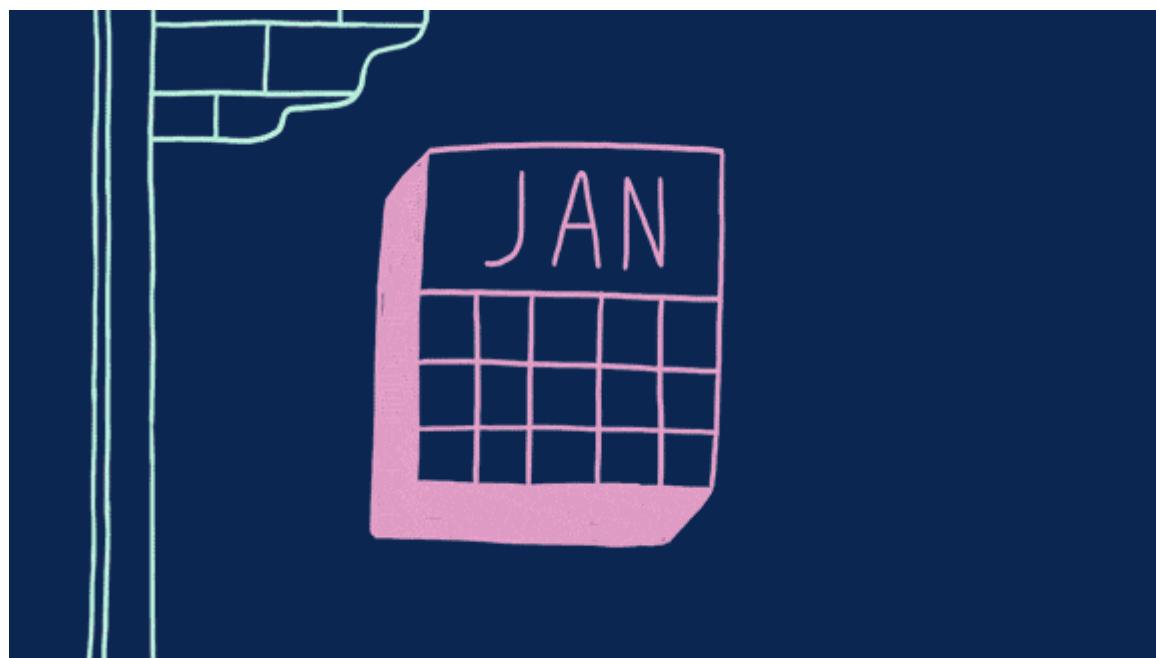
- **Urban Confer** (virtual only): Thursday, January 15, 2026, 1:00 – 4:00 PM ET (rescheduled from Jan. 8)
- NCUIH will be holding a virtual **prep session for UIOs** on January 14, 2026, at 1pm ET.

Tribal Consultations

UIOs are invited to the Tribal Consultations in-person to listen.

- December 15, 2025, 1:00 – 4:00 PM CT (Durant, OK)
- December 16, 2025, 1:00 – 4:00 PM MT (Denver, CO)
- December 17, 2025, 1:00 – 4:00 PM PT (San Diego, CA)
- December 22, 2025, 2:00 – 5:00 PM ET (Virtual)
- January 5, 2026, 1:00 – 4:00 PM MST (Flagstaff, AZ)
- January 6, 2026, 1:00 – 4:00 PM PT (Seattle, WA)
- January 7, 2026, 1:00 – 4:00 PM MST (Billings, MT)
- January 8, 2026, 1:00 – 4:00 PM CST (Green Bay, WI)

Upcoming Events and Important Dates



- December 18 — Department of Urban Indian Affairs Monthly Executive Director/Chief

Executive Officer Call

- January 14— 1 PM Eastern, [NCUIH UIO Prep Session for Urban Confer](#)
- January 15 — [Indian Health Service Urban Confer on Agency Realignment](#)
- January 21 — NCUIH Monthly Policy Workgroup
- January 21-22 — Indian Health Service Fiscal Year 2028 Area Budget Presentation Sessions
- February 10-11 — National Fiscal Year 2028 Budget Formulation Work Session
- April 27-30— [NCUIH Annual Conference 2026](#)

IHS & Federal Agency Updates

IHS Tribal Leaders Diabetes Committee (TLDC) — Dec. 2

- SDPI FY 2026 funding: 6-month awards (Jan-June); remainder to be issued when Congress fully authorizes SDPI.

TLDC recommended:

- 25% administrative supplements to all SDPI recipients (2026-27)
- Sharing area-level unobligated balances
- SDPI data impact analysis

Centers for Medicare & Medicaid Services Informational Bulletin Update

CMS TTAG Meeting — Dec. 8

- Tribal guidance on OBBBA coming this winter.
- CMS DTA pursuing Tribal exemption for HRSA's 340B Model Rebate Pilot.
- Ongoing vacancies: IHS Director and CMS DTA Director positions.
- CMS encourages Tribal-state engagement for RHTP implementation.

Section	Provision	Applicable to American Indians and Alaska Natives?
Section 71107	Eligibility Redeterminations	Does not apply to AI/ANs described in subsection (xx)(9) (A)(ii)(II)
Section 71119	Requirement for States to Establish Medicaid Community Engagement Requirements for Certain Individuals	Does not apply to AI/ANs described in subsection (xx)(9) (A)(ii)(II)
Section 71120	Modifying Cost Sharing Requirements for Certain Expansion Individuals under The Medicaid Program	Does not apply because existing cost sharing exemptions for certain American Indians and Alaska Natives are not changed by this section and still apply.

On November 18, the Centers for Medicare & Medicaid Services issued an informational bulletin clarifying how Medicaid and Children's Health Insurance Program provisions in the One Big Beautiful Bill Act apply to American Indians and Alaska Natives. The bulletin confirms that eligibility

redeterminations, Medicaid community engagement requirements, and modified cost-sharing provisions do not apply to eligible American Indian and Alaska Native individuals, including Urban Indians. Additional guidance issued on December 8 reiterates that American Indians and Alaska Natives are excluded from Medicaid work requirements.

Federal Hiring Freeze Ended — Oct. 15

- IHS is preparing staffing plans under the Continued Accountability in the Federal Government's Employment Executive Order.
- Vacancies will begin to be filled once the plan approved.

IHS Staffing Updates

1. Clayton Fulton now carries out duties of Acting IHS Director.
2. Benjamin Smith returns to Deputy Director.
3. Darrell LaRoche resumes Deputy Director for Management.
4. Dr. Rose Weahkee returns to Associate Deputy Director for Management Operations.

IHS Health IT Modernization — NCUIH Comments Submitted

NCUIH requested:

- Clarification on 24-hour national helpdesk function
- Details on PATH EHR capabilities
- Support for Traditional Healing documentation
- Continuous engagement with UIOs throughout modernization

IHS Request for Urban Cancer Care Services Data

- I/T/U Cancer Care Mapping Initiative seeking UIO participation in an interactive cancer care web map.
- Survey link: <https://www.surveymonkey.com/r/UrbanCancerCareMapping>

IHS FY 2028 Budget Formulation

- Tribal request: \$29.8 billion mandatory funding for IHS
- January 21-22, 2026: Area report presentations
- February 10-11, 2026: National Budget Formulation Work Session

BADGES for Native Communities Act Update

- On December 12, 2025, the Bridging Agency Data Gaps and Ensuring Safety for Native Communities Act unanimously [passed the United States Senate](#) and now advances to the House of Representatives.
- The bipartisan legislation strengthens Tribal public safety, improves reporting on Missing or Murdered Indigenous Peoples, and establishes a grant program to support coordinated response efforts.
- Urban Indian Organizations are eligible entities under the grant program.

Reminder: One Big Beautiful Bill Act

Resource for Urban Indian Organizations

OVERVIEW OF THE ONE BIG BEAUTIFUL BILL ACT

Provisions Impacting American Indian and Alaska Native People

- ▶ On July 4, 2025, the President signed the One Big Beautiful Bill Act (OBBA) into law.
- ▶ The OBBBA is a major bill that delivers many elements of President Trump's legislative agenda, including new requirements for access to Medicaid and SNAP.
- ▶ **Fortunately, Indians, Urban Indians, California Indians, and individuals determined eligible as an Indian for the Indian Health Service under regulations promulgated by the Secretary are exempted from the Medicaid requirements in the OBBBA and included in exemptions for the Supplemental Nutrition Assistance Program (SNAP) work requirements.**

Community Engagement Requirements for Certain Medicaid Beneficiaries

What it Does: States are required to implement community engagement and work requirements for able-bodied adults without dependents beginning after December 31, 2026. Compliance may be achieved through working, volunteering, or participating in a work program for at least 80 hours/month; or enrolling in an educational program at least half-time.

AI/AN People Exempted: The bill exempts American Indian and Alaska Native beneficiaries from these requirements.¹

NCUIH has developed a resource to help Urban Indian Organizations understand Medicaid and Children's Health Insurance Program provisions under the One Big Beautiful Bill Act. The resource outlines which provisions apply to Urban Indian Organizations and clarifies protections and exemptions for American Indian and Alaska Native patients during state-level implementation.

UIO Input Request

NCUIH is continuing to engage with federal partners on several policy developments that may affect Urban Indian Organizations, including Indian Health Service (IHS) Realignment efforts and broader discussions related to care delivery and program administration.

To strengthen NCUIH's advocacy and ensure UIO perspectives are accurately reflected, we invite UIOs to share feedback and experiences related to the following:

- **IHS Realignment Participation:** Are you planning to attend any upcoming in-person consultations related to IHS Realignment?
- **Realignment Concerns:** Do you have concerns or considerations regarding the proposed IHS Realignment, particularly as it relates to UIO operations or service delivery?
- **Contract Centralization:** How might the proposed centralization of contracts at IHS Headquarters, rather than through Area Offices, impact your organization? Are there specific concerns you would like NCUIH to elevate?
- **Food is Medicine Programs:** Do any UIOs currently operate or plan to develop Food is Medicine programs specifically designed to support cancer patients?

Feedback shared will help inform NCUIH's ongoing policy engagement, written comments, and participation in consultations and advisory discussions.

How to respond: UIOs are encouraged to share feedback by emailing policy@ncuih.org.

Save the Date: 2026 NCUIH Annual Conference



Join us for our 2026 Annual Conference on April 27-30, 2026, at The Westin Downtown in Washington, D.C. The conference will bring together Urban Indian Organizations, health leaders, policymakers, and partners to share strategies, strengthen systems, and advance urban Indian health nationwide. Programming includes UIO board training, two full days of conference sessions, and a Hill Day for Urban Indian Organizations. NCUIH is also accepting session and poster proposals, with submissions due January 15, 2026.

One Last Thing – Check Out This Upcoming Funding Opportunity

Urban Indian Organizations can now apply for funding to support culturally grounded overdose prevention projects.

Applications are due January 16, 2026, with awards of up to \$45,000.

Our partners at Seven Directions and the National Network of Public Health Institutes are sharing

materials to help spread the word—please repost or use the linked graphics to share this opportunity with your community.

About NCUIH

The National Council of Urban Indian Health (NCUIH) is a national representative for the 41 Urban Indian Organizations contracting with the Indian Health Service under the *Indian Health Care Improvement Act*. NCUIH is devoted to the support and development of high quality and accessible health and public health services for American Indian and Alaska Native people living in urban areas.

NCUIH respects and supports Tribal sovereignty and the unique government-to-government relationship between our Tribal Nations and the United States. NCUIH works to support those federal laws, policies, and procedures that respect and uplift Tribal sovereignty and the government-to-government relationship. NCUIH does not support any federal law, policy, or procedure that infringes upon or in any way diminishes Tribal sovereignty or the government-to-government relationship.