

2020 CHAP FUNDING TRIBAL CONSULTATION SUMMARY

This summary outlines the comments received in response to the Tribal Consultation initiated by the Indian Health Service (IHS) on September 21, 2020, with a comment period that closed on November 23, 2020, regarding funding for fiscal year (FY) 2020 national Community Health Aide Program (CHAP) implementation. The summary also includes the recommendations the Agency received from the CHAP Tribal Advisory Group (TAG) and frequently asked questions regarding the funding. The IHS received a total of 118 comments from 13 Tribes, Tribal Organizations, individuals, and national advocacy organizations. The comments received were directly related to the implementation priorities outlined in the Tribal Leader Letter.

SUMMARY OF COMMENTS

In summary, commenters offered the following:

Investing in Areas Ready to Operate a CHAP

- Recommended that the Agency fund Tribes and Tribal Organizations within IHS Areas positioned to begin certifying providers.
- Recommended that the Agency include the Alaska CHAP in the funding decision.

Certification Board Investments

- Recommended that funding needs for technical assistance, establishment, and operation of both IHS Area and National CHAP Certification Boards for the contiguous 48 states be addressed by the Agency.

Training Infrastructure

- Recommended that the Agency support existing training by funding Tribal colleges and universities, educational institutions, Tribal training programs, and Tribal support initiatives, such as the Indian Country Extension for Community Health Outcomes (ECHOs).

Community Education

- Recommended that the Agency continue to invest in community education to amplify the role of the CHAP within health care systems.

National Infrastructure

- Recommended that the Agency fund national infrastructure that includes staffing for foundational elements, such as activities by the Office of Personnel Management (OPM), including classification of community health aides, national CHAP standards and procedures, and CHAP planning, budgeting, and reimbursement.
- Recommended that the Agency fund future planning for the CHAP including, budgeting, program analysis, and operations.

Funding Mechanisms

- Indicated a preference for using Indian Self-Determination and Education Assistance Act (ISDEAA) funding mechanisms rather than competitive grants.
- Recommended that the Agency allocate the \$5 million funding equally among each of the 12 IHS Areas.
- Recommended that the Agency not equally divide the \$5 million funding among the 12 IHS Areas to ensure the funds can effectively address implementation.

CHAP TAG RECOMMENDATIONS

On November 30, 2020, the IHS met with the CHAP TAG and presented the de-identified findings of Tribal Consultation. The CHAP TAG recommended that the IHS allocate the \$5 million funding as follows:

- A total of \$2.5 million to the Portland Area IHS, Alaska Area IHS, and Billings Area IHS, to address the needs of IHS Areas ready to begin the operation of a CHAP.
- A total of \$1.5 million to the other nine IHS Areas for Area infrastructure (e.g., Area Certification Boards (ACBs) and Area Standards and Procedures).
- A total of \$1 million to IHS Headquarters for national infrastructure.

The CHAP TAG emphasized the importance of utilizing the funds where needed and recommended that the Agency consider the following conditions when finalizing CHAP funding decisions:

- If any of the three IHS Areas receiving a portion of the \$2.5 million are unable to spend down the funding allocation, these funds should be reprogrammed and returned to other IHS Areas in that category.
- If any of the nine IHS Areas receiving a portion of the \$1.5 million are unable to spend down the funding allocation, these funds should be reprogrammed and returned to the other IHS Areas in that category.
- No distribution through grants, with a preference for ISDEAA funding instruments.

FREQUENTLY ASKED QUESTIONS

Why is the IHS using grants to distribute the funding?

Utilizing grants to distribute the funding enables flexibility to target resources to Tribes and Tribal Organizations that are currently considering implementation of a CHAP within their communities, while addressing critical needs nationally for all programs. Grants also better enable the IHS to measure how it can best support Tribes and Tribal Organizations currently planning and assessing the integration of a CHAP into their communities.

How is the IHS dividing the grant funding available to Tribes and Tribal Organizations?

The IHS is establishing two different grant programs that reflect the comments received at large by Tribes, the recommendations of the CHAP TAG, and that the needs of implementing the program differ across the country. Tribes and Tribal Organizations encouraged the IHS to ensure there is routine regionalization and flexibility in the design and implementation of the CHAP. Working with the CHAP TAG, a focus on regionalization and flexibility contributed to the certification board which enables Area Certification Boards (ACBs) to retain much of the daily responsibility for reviewing and certifying prospective providers. This approach is further supported by acknowledging that many Tribes and Tribal Organizations acting in self-determination have made their own investments into the CHAP and are at the forefront of CHAP implementation in the contiguous 48 states. There are also Tribes and Tribal Organizations still evaluating whether the CHAP is the best fit for their communities, or if additional planning is required.

Why did the IHS not utilize ISDEAA agreements to distribute the funds?

At the current stage of CHAP implementation, the IHS needs to prioritize foundational elements critical to the existence and success of CHAP operations in the contiguous 48 states. The selected distribution of funds also allows the Agency to support Tribes and Tribal Organizations that require additional planning resources, as they consider their existing infrastructure and the potential integration of CHAP.

Why did the IHS decide to combine the FY 2020 and FY 2021 funding?

By combining FY 2020 and FY 2021 funding, the IHS was able to concentrate more resources for Tribes and Tribal Organizations, extend the time period of the grants, so the outcomes could be achieved over a longer period, and extend the time in which the planning could be done by Tribes and Tribal Organizations.

Did the IHS consider any other funding mechanisms other than grants and ISDEAA?

The agency reviewed the feasibility of utilizing grants, ISDEAA funding mechanisms, and the pilot project authority. The pilot project authority posed a few limitations including a cap of 10 funding awards and exclusion of pre-existing CHAP (such as the Alaska CHAP).