



JULY 02 2018

Dear Tribal Leader:

I am writing to initiate a Tribal Consultation on proposed updates to the attached Indian Health Service (IHS) *Sanitation Deficiency System (SDS) - A Guide for Reporting Sanitation Deficiencies for American Indian and Alaska Native Homes and Communities* (commonly known as the “SDS Guide”). Please provide your comments and recommendations on the SDS Guide including the point distribution across the SDS scoring factors, following a recommendation made by the U.S. Government Accountability Office (GAO) in their May 15, 2018, report<sup>1</sup>.

The IHS uses the SDS Guide to collect data and report the current sanitation deficiencies affecting American Indian and Alaska Native (AI/AN) homes and communities. Sanitation deficiencies are reported to Congress annually, in accordance with the Indian Sanitation Facilities Act, Public Law (Pub. L.) 86-121, and Indian Health Care Improvement Act (IHCIA), Pub. L. 94-437, as amended by the Patient Protection and Affordable Care Act, Pub. L. 111-148.

Since 2014, the IHS has focused on data quality with a goal of ensuring that sanitation deficiency needs reported through the SDS process are accurate and conform to the requirements of the Indian Health Sanitation Facilities Act and the IHCIA. During our annual SDS data review, it became apparent that ambiguity and conflicting sections of the May 2003 Working Draft version of the SDS Guide were contributing to poor data outcomes. To address the issues that lead to poor data outcomes, the IHS revised the SDS Guide with a focus on seven key areas (see Table 1).

Coincidental to the IHS review of the SDS Guide, the GAO conducted a review of all Federal programs that fund drinking water and wastewater infrastructure for AI/AN communities, resulting in a May 15, 2018, report. Among the recommendations in the GAO report was that the IHS should reassess the point scoring distribution in the SDS Guide. The GAO is concerned that the current scoring approach allows for the funding of lower deficiency projects over higher deficiency projects. A summary of the factors used in the SDS scoring process are included in Table 2.

You are invited to provide written feedback on the proposed updates to the SDS Guide and comment on whether the priority ranking scoring system, which has remained unchanged in the current update, appropriately meets the needs of Tribal communities.

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<sup>1</sup> Full GAO report, “Drinking Water and Wastewater Infrastructure: Opportunities Exist to Enhance Federal Agency Needs Assessment and Coordination on Tribal Projects,” is located at <https://www.gao.gov/products/GAO-18-309>.

Page 2 - Tribal Leader

Tribal Consultation on the SDS Guide will consist of the following:

- A 30-business day comment period, beginning July 2, 2018 through August 14, 2018.

Written comments will be accepted throughout the duration of the Tribal Consultation. The deadline to provide your comments is August 14, 2018.

A copy of the proposed SDS Guide is posted online for review under the title “SDS 2018 Final Draft for Tribal Consultation” and can be located on the following web page:

<https://www.ihs.gov/newsroom/triballeaderletters/>.

Please send your comments and recommendations on the SDS Guide:

- By e-mail to: [consultation@ihs.gov](mailto:consultation@ihs.gov)

Subject Line: SDS Guide Tribal Consultation

- By postal mail to:

RADM Michael D. Weahkee  
Acting Director  
Indian Health Service  
5600 Fishers Lane, Mail Stop: 08E86  
Rockville, MD 20857

ATTN: SDS Guide Tribal Consultation

I look forward to your input and recommendations regarding the SDS Guide. Following the close of the comment period, the IHS will convene to review all comments. The IHS Division Sanitation Facilities Construction (DSFC) will then formulate recommendations for IHS leadership to review and consider.

If you have any questions about the SDS Guide Tribal Consultation, please directly contact RADM Mark Calkins, Director, DSFC, IHS, by telephone at (301) 443-1046.

Sincerely,

/Michael D. Weahkee/

RADM Michael D. Weahkee, MBA, MHSA  
Assistant Surgeon General, U.S. Public Health Service  
Acting Director

Enclosures: Table 1 Key Updated SDS Guide Elements  
Table 2 Current SDS Scoring Factors  
Sanitation Deficiency System Guide

<b>REFERENCES</b>	
<b>Name</b>	<b>Available at</b>
<i>Indian Health Care Improvement Act (IHCIA)</i>	<a href="https://www.ihs.gov/ihcia/">https://www.ihs.gov/ihcia/</a>
<i>Criteria for the Sanitation Facilities Construction Program, June 1999 Ver1.02, 3/13/03</i>	<a href="https://www.ihs.gov/dsfc/includes/themes/responsive2017/display_objects/documents/Criteria_March_2003.pdf">https://www.ihs.gov/dsfc/includes/themes/responsive2017/display_objects/documents/Criteria_March_2003.pdf</a>
<i>Sanitation Deficiency System (SDS) Guide for Reporting Sanitation Deficiencies for Indian Homes and Communities, Working Draft May 2003.</i>	<a href="https://www.ihs.gov/dsfc/includes/themes/responsive2017/display_objects/documents/SDSWorkingDraft2003.pdf">https://www.ihs.gov/dsfc/includes/themes/responsive2017/display_objects/documents/SDSWorkingDraft2003.pdf</a>