



National Community Health Aid Program Tribal Advisory In-Person Meeting

Jennifer McLeod, CHAP TAG, Tribal Co-Chair
Beverly Cotton, CHAP TAG, Federal Co-Chair

April 3, 2019

2019 Tribal Self-Governance Conference
Grand Traverse, MI



Welcome

- Jennifer McLeod (Bemidji Area)
 - CHAP TAG Tribal Chair

- Dr. Michael E. Toedt, MD
 - IHS Chief Medical Officer



Roll Call for CHAP TAG Representatives

- Alaska
- Albuquerque
- Bemidji
- Billings
- California
- Great Plains
- Nashville
- Navajo
- Oklahoma City
- Phoenix
- Portland
- Tucson



Roll Call for IHS and Others

- IHS Senior Leaders
- IHS Area Directors and Staff
- Office of General Counsel
- Others

CHAP TAG Recap from March 15

- Presented by Beverly Cotton, Federal Chair
 - Concern from CHAP TAG: Scope section does not include tribal regulatory standards for CHAP
 - Concern that an Area Certification Board could override tribal regulatory standards
 - No gap should exist for Portland Area Tribes to recognize their providers
 - Policy needs to address certification process

March 15 Recap Cont'd

- Add in tribal consultation for the IHS CMO and Area Directors for tribal representatives on certification boards
 - Concern of current structure of the boards and too much authority placed with IHS on membership
- Policy should state that professional associations are not allowed as members of the National Certification Board or Area Certification Boards
- Review adding CHAP TAG role in the CHAP circular

IHS Draft Circular Review

IHCIA requires...	CHAP TAG Recommends...	Draft Circular...
IHS cannot fill dentist vacancy with DHAT	Provides clarification this does not apply to Title I or Title V ISDEAA Tribes	Policy: Clearly outlines this restriction for IHS
Certification	Including tribal consultation to ensure tribal representation is included on certification boards	Several Areas: Will include the federal National Certification Board and Area Certification Boards.
State authorization for DHAT	Need to specify Title I and Title V ISDEAA Tribes are not subject to this restriction.	The IHCIA only permits CHAPs to include DHAT services in states that authorize the use of DHAT services. It is a requirement of Federal law and all CHAPs included in an ISDEAA compact/contract must comply with this federal requirement.

IHS Draft Circular Review

IHCIA requires...	CHAP TAG Recommends...	Draft Circular...
Will not reduce the funding amounts for Alaska CHAP	Add that this policy will not change the Alaska CHAP Standards and Procedures or Certification Board or tribal regulatory standards that meet or exceed the Alaska CB Standards	<p>Scope: Does not apply to Alaska CHAP or its standards or procedures</p> <p>Policy: Expansion of CHAP will comply with IHCIA and not reduce funding amounts of Alaska CHAP. Removed tribal regulatory standards language requiring all Tribes to follow the federal requirements built in consultation with Tribes and be certified by a federal board.</p>
Does not apply to Urban Indian Organizations	Clarification needed	Scope: This restriction is outlined

Consultation Timeline & Process

- Goal timeline is to consult on draft circular policy through Dear Tribal Leader Letter by May 1, 2019
- Share draft Dear Tribal Leader Letter for CHAP TAG review prior to issuing
- Name the outstanding issues to outline in the Dear Tribal Leader Letter



Working Session

- Identify outstanding issues that CHAP TAG would like to see outlined in the Dear Tribal Leader Letter



Next Steps

- Draft letter written by April 8
- Draft letter sent to TAG for review by April 12
- Comments due from TAG to IHS by April 19
- IHS issues letter by May 1, 2019 (concurrent IHS official review and comment period)
- Comments close by June 1, 2019 (perhaps a longer period regarding any conflicts)
- Comments consolidated and summary shared with TAG by June 15, 2019
- Policy reconciliation and any changes shared with TAG by July 15, 2019
- Move draft policy for HHS review
- Final step is approval by IHS Director