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Dear Urban Indian Organization Leader:

I am writing to confer on effective evaluation data for Urban Indian health programs (UIHPs) that are funded by the Indian Health Service (IHS) under Title V of the Indian Health Care Improvement Act (IHCIA). During several meetings over the past 2 years, I have heard that some programs are concerned that the data and evaluation requirements for Title V UIHPs are difficult to meet for some programs and do not accurately reflect the range of programs and services of UIHPs. For example, while certain clinical measures may be routine for UIHPs with ambulatory clinics, they may be difficult to meet by UIHPs that only provide limited clinical services or outreach and referral services.

Using appropriate metrics to accurately evaluate UIHPs according to the services provided has been identified as a critical issue among UIHPs. Evaluation of UIHPs is essential to showing effective use of federal funding and demonstrating successes, outcomes and best practices. Evaluation data collected to date by UIHPs have included Government Performance and Results Act data, Uniform Data System (UDS) data that are required for UIHPs that are clinics funded by the U.S. Department of Health & Human Services Health Resources and Services Administration (HRSA) under section 330 of the Public Health Service Act (PHSA), as amended, and measures necessary to achieve accreditation, demonstrate meaningful use of an electronic health record, or comply with certification and payment requirements for federal programs. While there has been work in the past to standardize the data collection by UIHPs, the diversity of services makes standardization a challenge. It is not practical to require programs to report on measures for which they do not provide services.

In discussions with the National Council of Urban Indian Health, we have briefly discussed this issue and the possibility of working together in partnership to develop a more effective and relevant data and evaluation process for UIHPs. We have considered the potential to modify requirements to be more relevant for the three levels of services in UIHPs: full ambulatory; limited ambulatory; and, outreach and referral. While no decisions have been made, it is clear that this discussion is important for the future of UIHPs, especially as we look to enhance our partnership on budget formulation.

Therefore, in accordance with the *IHS Policy on Conferring with Urban Indian Organizations*, I am writing today to confer and request your input on how we might work together to develop a more effective and relevant evaluation and data collection process for UIHPs. Urban Indian Organizations may submit comments and recommendations by e-mail to [urbanconfer@ihs.gov](mailto:urbanconfer@ihs.gov) or by mail to Indian Health Service, 801 Thompson Ave, Suite 440, Rockville, MD, 20852. The deadline for receipt of comments is December 31, 2014.

I am also writing to notify you that the Information Collection Request of OMB Control No. 0917-0007, “Office of Urban Indian Health Programs’ Uniform Data System (UDS),” expired on October 31, 2014. Given the plan to confer with UIHPs on data and evaluation, which would include examination of UDS as a method of evaluation, we decided to allow this information collection request to expire until we determined any new or different requirements as a result of the confer process. Therefore, UIHPs are no longer required to collect and report UDS data to the IHS Office of Urban Indian Health Programs (OUIHP). UIHPs may continue to collect UDS data for monitoring and evaluation purposes as they see fit, and those that are funded by section 330 of the PHSA, as amended, of course should continue to report this data as required to the HRSA. If we determine during the confer process that the UDS should continue to be a part of the UIHP evaluation, IHS will then submit a new and updated Information Collection Request.

I look forward to conferring with you on the most effective evaluation and data collection process for UIHPs. If you have any questions or concerns, please contact P. Benjamin Smith, Acting Director, OUIHP at (301) 443-4680.

Sincerely,

/Yvette Roubideaux/

Yvette Roubideaux, M.D., M.P.H.  
Acting Director