



IHS Oversight and Accountability

The Indian Health Service's mission is *"to raise the physical, mental, social, and spiritual health of American Indians and Alaska Natives to the highest level."*

Background: Between 2019 and 2021, the Indian Health Service received recommendations from IHS-commissioned internal reviews and external entities on the design and implementation of IHS policies and processes established to protect patients and to hold employees accountable for compliance. The IHS concurred with Office of Inspector General (OIG) and U.S. Government Accountability Office (GAO) recommendations and submitted plans for corrective actions. In 2021, IHS developed a targeted action plan to meet the GAO's criteria for being removed from their high-risk list, which IHS was placed on in 2017. The IHS also initiated strategies to address prior recommendations from the Presidential Task Force on Protecting Native American Children in the Indian Health Service System.

In November 2021, the Director's Policy Advisory Council (DPAC) was charged by the acting IHS director at that time to review all recommendations related to patient protection to ensure a centralized and cohesive understanding of the agency's progress in addressing those recommendations. This work provided a foundation and complemented efforts for further developing agency action and work plans to ensure a targeted approach to monitoring progress, hold staff accountable for continued action, and pave the way for sustained improvement.

Status: In January, IHS leadership implemented the [2023 Agency Work Plan](#), which aims to address these recommendations. The work plan outlines critical priorities that will guide agency improvements over the next year and complements ongoing activities to improve patient safety and provide critical oversight of our programs. Through the 2023 Agency Work Plan, IHS leadership is leveraging the work of the DPAC to ensure all recommendations are addressed, accountable staff are assigned and completing work on open recommendations, and actions are continuously tracked and monitored to sustain improvements. IHS will provide quarterly updates on the progress of the recommendations through the IHS Recommendations Status Report.

The IHS is committed to ensuring high-quality, safe patient care in partnership with tribes, tribal organizations, and urban Indian organizations. Highlights of IHS actions taken to protect patients and prevent abuse are included below.

Agency Oversight:

- Established the [Office of Quality](#) to enhance the agency's ongoing efforts to ensure the delivery of quality health care at federally operated facilities serving American Indian and Alaska Native people.
- Established the [Quality Assurance Risk Management Committee](#) (QARMC) for senior level oversight of complex adverse patient safety events and clinical or administrative matters affecting care within IHS-operated health facilities.
 - The QARMC implemented tracking of the highest risk cases, improved collaborations with the OIG and Area principals in needed administrative and criminal investigations and agency responses, and made significant progress in bringing cases to closure by resolving all needed administrative actions swiftly and effectively.
- Established a national compliance program that serves as the agency focal point for coordinating and promoting agency-wide compliance activities.
- Developed a robust review plan and protocol for completion of IHS Headquarters oversight reviews of each IHS Area.
- Charged the IHS [Director's Policy Advisory Council](#) with a comprehensive review of the status of implementing patient safety recommendations and developing improved processes for centralized tracking and reporting of agency actions.
- Standardized governing board bylaws across all direct service facilities to provide for oversight and accountability while increasing efficiency and effectiveness of governing board meetings.

Reporting:

- Created and established a toll-free hotline and website for reporting suspected child or sexual abuse.
 - [Hotline for Reporting Child/Sexual Abuse](#): 855-SAFE-IHS (855-723-3447)
- Transitioned to the IHS Safety Tracking and Response (I-STAR) system, a centralized system for reporting of patient safety data.
- Displayed [IHS child and sexual abuse prevention posters](#) in every direct service facility for employees and patients on reporting abuse.

Policy and Training:

- Updated policy on mandatory reporting requirements for All IHS staff. These guidelines help employees identify and respond to suspected child maltreatment.
 - [IHS Policy](#): Protecting Children from Sexual Abuse by Health Care Providers
 - [Reference](#): A consolidated list of related IHS policies is available on the IHS website.
- Instituted mandatory IHS-wide training on the updated policy.
 - [Mandatory Annual Training](#): Protecting Children from Sexual Abuse by Health Care Providers

- Updated guidance on [trauma-informed care](#) to better address violence and victimization.
 - [IHS Policy](#): Trauma-Informed Care
- Strengthened collaboration between the IHS and OIG with joint training opportunities for compliance and overall improvements in making reporting more timely, efficient, and responsive. Partnered with the HHS OIG in their production of a training series that includes specialized training around improvements in patient safety.
 - [Training](#): Improving Health and Well-Being in American Indian and Alaska Native Communities Through Compliance

Personnel Processes and Systems:

- Implemented a nationwide electronic provider credentialing system that modernizes provider credentialing and privileging within federally-operated hospitals and clinics.
- Implemented an employee relations case tracking system to manage nationwide employee relations activities.
- Implemented an electronic Security Manager System to track personnel background investigations.
- Established a standardized procedure for determinations of unsuitability from a background investigation.
 - [IHS Policy](#): Personnel Security/Suitability Determinations

Additional Actions Specific to the Nashville Area and Unity Healing Center:

- Implemented several training modules that emphasize recognition of abuse, safety, and reporting.
- Established an Area-level committee to review incidents of misconduct and substandard performance.
- Enhanced communication with investigative entities such as the HHS Office of Inspector General.

Reference Reports:

- [“Indian Health Service Has Strengthened Patient Protection Policies but Must Fully Integrate Them Into Practice and Organizational Culture,”](#) OIG report OEI-06-19-00330, issued December 2019
- Integrity Creative Solutions (ICS) report [“A Focused Retrospective Review by ICS, of IHS Response to Allegations of Sexual Abuse,”](#) dated January 2020
- [“Presidential Task Force on Protecting Native American Children in the Indian Health Service System”](#) report dated July 23, 2020
- [“Indian Health Service Facilities Made Progress Incorporating Patient Protection Policies, but Challenges Remain,”](#) OIG report OEI-06-19-00331, issued December 2020
- [“Indian Health Service: Actions Needed to Improve Oversight of Provider Misconduct and Substandard Performance,”](#) GAO report GAO-21-97, dated December 10, 2020
- [“IHS Quality Assurance Review of Unity Healing Center,”](#) dated May 22, 2020

March 2023