

IHS TRIBAL SELF-GOVERNANCE ADVISORY COMMITTEE

c/o Self-Governance Communication and Education
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Delivered electronically to Rose.Lusi@hhs.gov

June 22, 2017

The Honorable Thomas E. Price
Secretary
Department of Health and Human Services
200 Independence Ave, SW
Washington, DC 20201

RE: Request for Tribal Consultation on HHS Reimagining Initiative and Invitation to the TSGAC Quarterly Meeting July 18-19, 2017

Dear Secretary Price,

On behalf of the Indian Health Service (IHS) Tribal Self-Governance Advisory Committee (TSGAC), I write to request that the Department of Health and Human Services (HHS) conduct Tribal Consultation prior to submitting recommendations to the Office of Management and Budget pursuant to Executive Order 13781, *Comprehensive Plan for Reorganizing the Executive Branch*.

TSGAC believes that any efforts to reorganize, streamline, or create efficiencies require Tribal Consultation under the HHS Tribal Consultation Policy, most recently revised in 2010. The Department's Tribal Consultation Policy states that, "Before any action is taken that will significantly affect Indian Tribes it is the HHS policy that...consultation with Indian Tribes will occur." The policy further states that actions that may "have substantial direct effects on one or more Indian Tribes" or impact "on the relationship between the Federal Government and Indian Tribes" require Tribal Consultation. Therefore, we believe that Tribal Consultation on this initiative is necessary.

Self-Governance is an excellent and proven means to downsize federal bureaucracy and ensure resources reach the local level. As such, we recognize that reorganization can be very beneficial and do not categorically oppose efforts to do so; however, the purpose of any reorganization should be to improve quality of care, access to care, and the efficiency in which resources are provided to Tribal citizens. TSGAC is willing and prepared to assist HHS staff and others throughout this process and request open access to the ideas and suggestions that are developed prior to finalization. Proper Tribal Consultation and active participation and engagement throughout this process will undoubtedly impact the success and outcomes of your recommendations to the Office of Management and Budget Director. We hope to learn how your office is planning to engage in Tribal consultation, as required by the HHS Tribal Consultation Policy, prior to any implementation or submission to the Office of Management and Budget.

Additionally, TSGAC is hosting our regular quarterly meeting July 18-19, 2017 in Washington, DC, where we have set aside time to discuss this initiative. We invite you or a representative from the Department to attend the meeting to provide an update of the process and review future opportunities to formally provide our feedback.

We look forward to your partnership on this issue and hope that you are able to attend the upcoming TSGAC meeting. Please contact and coordinate additional arrangements for the proposed meeting with Terra Branson, Director of Self-Governance Communication & Education Tribal Consortium at terrab@tribalselfgov.org or (918) 302-0252. Thank you.

Sincerely,



Marilynn "Lynn" Malerba
Chief, The Mohegan Tribe of Connecticut
Chairwoman, Tribal Self-Governance Advisory Committee

cc: Chester Antone, Councilman, Tohono O'odham Nation and Chair, HHS Secretary's Tribal Advisory Committee
Nicolas Barton, Chairman, Direct Service and Contracting Tribes Advisory Committee, IHS
RADM Michael Weahkee, Acting Director, IHS
RADM Kevin Meeks, Acting Deputy Director of Field Operations, IHS
Jennifer Cooper, Acting Director, Office of Tribal Self-Governance, IHS