

# IHS TRIBAL SELF-GOVERNANCE ADVISORY COMMITTEE

c/o Self-Governance Communication and Education  
P.O. Box 1734, McAlester, OK 74501

Telephone (918) 302-0252 ~ Facsimile (918) 423-7639 ~ Website: [www.tribalsegov.org](http://www.tribalsegov.org)

Delivered electronically to: [Denise.Turk@ihs.gov](mailto:Denise.Turk@ihs.gov)

July 31, 2017

RADM Michael Weahkee  
Acting Director  
Indian Health Service  
Office of the Director  
5600 Fishers Lane  
Mail Stop: 08E53  
Rockville, MD 20857

## **RE: Recommendations for the IHS Scholarship and Loan Repayment Programs**

Dear Acting Director Weahkee:

I write on behalf of the Indian Health Service (IHS) Tribal Self-Governance Advisory Committee (TSGAC) to provide recommendations regarding the IHS Scholarship and Loan Repayment Programs. Continued improvement and expansion of these programs will undoubtedly support efforts to address the ongoing workforce issues IHS faces. We appreciate the opportunity to weigh in and provide the following recommendations for consideration.

**Expand programs to include administrative and management positions.** Current regulation restricts program eligibility to positions that provide direct service to patients; however, legislation provides the authority to extend program eligibility to “an allied health profession.” Further, 42 USC § 295p states “The term ‘allied health professionals’ means a health professional (other than a registered nurse or physician assistant) ...who shares in the responsibility for the delivery of health care services or related services, including – health systems management services...” Providing quality health care involves the entire health system, which includes administrative and management positions. By actively recruiting personnel to fill these types of positions and providing incentives through the scholarship and loan repayment program, it ensures the health system, as a whole, is operating at its highest level. As such, the TSGAC recommends IHS reevaluate the regulations and include these vital positions in program eligibility.

**Regularly assess priority disciplines and fields of study.** As the need for health professionals continues to grow and change, it is important that IHS assess which disciplines are most needed in each Indian health program on a regular basis. By assessing the most hard-to-fill disciplines on a regular basis, it ensures IHS has the needed data to assist in determining the priority in which program awards are granted and locations for service obligations are assigned accordingly. This also assists IHS in meeting legislative requirements for periodic reassessment. In addition, regularly assessing needed disciplines will enable IHS to better target chronic workforce shortages and vacancies.

**Request the IHS loan repayment program have the same tax free status as the National Health Service Corps (NHSC).** While the loan repayment program has proven to be the IHS's best recruitment and retention tool to ensure an adequate health workforce to serve in the many remote IHS locations, the program does not have the same tax free status as the NHSC, both of

which enable health care professionals to provide needed care and services to underserved populations. As a result, the IHS uses a large portion of its resources to pay the taxes that are assessed on its loan recipients. By making the IHS loan repayments tax free, it would save \$7.21 million, which in turn would fund an additional 232 awards and enable IHS to fill two-thirds or more of the loan repayment requests received.

As always, TSGAC appreciates the ongoing efforts to improve workforce recruitment and retention and looks forward to continued collaboration in addressing workforce issues. If you have any questions or concerns regarding the recommendations from above please contact me at [lmalerba@moheganmail.com](mailto:lmalerba@moheganmail.com). Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Lynn Malerba".

Chief Lynn Malerba, Mohegan Tribe of Connecticut  
Chairwoman, IHS TSGAC

cc: Jennifer Cooper, Acting Director, Office of Tribal Self-Governance, IHS  
TSGAC Members and Technical Workgroup