

IHS Tribal SELF-GOVERNANCE ADVISORY COMMITTEE
c/o Self-Governance Communication and Education
314 W. 14th Place, Tulsa, OK 74119
Telephone (918) 302-0252 ~ Facsimile (918) 423-7639 ~ Website: www.tribalselfgov.org

Sent electronically to denise.turk@ihs.gov

December 2, 2019

RADM Michael D. Weahkee, MBA, MHSA
Assistant Surgeon General, U.S. Public Health Service
Principal Deputy Director
Indian Health Service
U.S. Department of Health and Human Services
5600 Fishers Lane
Rockville, MD 20857

RE: Special Diabetes Program for Indians Tribal Consultation

Dear RADM Weahkee:

On behalf of the Indian Health Service (IHS) Tribal Self-Governance Advisory Committee (TSGAC), I write to provide the following comments regarding the funding formula and distribution of the Special Diabetes Program for Indians (SDPI).

As you are aware, TSGAC continues to advocate that funding for health services through granting mechanisms should conclude so that Tribes and IHS Service Units can leverage recurring funds to best serve the needs in tribal communities. Disease-specific and grant-funded programs leave Tribes in the tough position of whether they can and will continue to support a program when federal support concludes. However, we recognize that concluding the granting process for SDPI may not be a short-term option ahead of the next funding cycle and offer responses to the questions identified in your October 2, 2019 Dear Tribal Leader letter.

SDPI Formula Distribution

- a. If SDPI is funded at \$150M, should there be changes in the funding distribution? If so, what changes should be made?***

TSGAC supports continuity of current programs to ensure continued success in program outcomes and continuity of care locally. Therefore, IHS should make every effort to hold current grantee harmless and leave the current distribution procedures for grantees in place.

TSGAC does hope that IHS will reconsider expenses incurred to operate, to oversee, and to manage grantees as it appears these costs are in excess of \$1.5 million dollars under the SDPI Support Grants Management Staff and Grants Management System items. It seems as though IHS has built an unnecessarily heavy administrative structure to fund what has been an uncompetitive and ongoing granting process. IHS and the Tribal Leaders Diabetes Committee (TLDC) should evaluate what the minimum requirements and identify efficiencies for managing this mandatorily funded grant program. Those saving should then transfer to the total grant funding available for grantees.

TSGAC further recommends that TLDC similarly evaluate improvements that have been achieved under the Data Improvements Initiative to determine if funds currently allocated are necessary and serving the larger needs of grant program nationwide. If not, those savings should be allocated to increase the availability of funds for eligible grantees.

b. If the SDPI receives an increase in funding above the current \$150M, how should those funds be utilized?

TSGAC supports utilizing increases in funding to either increase the number of entities receiving funding or the total amount going to grantees. However, TSGAC would not support increasing any funding allocations for SDPI Support or Data Infrastructure Improvement.

SDPI Formula:

a. Should there be changes to the national funding formula?

TSGAC does not recommend changes to the national funding formula at this time.

b. Should more recent user population and diabetes prevalence data be used? If so, how would the resultant changes in the Area funding distribution be addressed?

Though TSGAC does not have a consensus recommendation for changing the formula, the Committee does believe that using updated data to drive distribution is critical to reflect the reality the grantees experience. Therefore, TSGAC supports using the most recent user population and disease prevalence data at the time of grant solicitation and distribution.

In closing, we thank you for seeking input on any future changes. We look forward to continuing this discussion as the decision-making process moves forward. If you have any questions or concerns regarding our recommendations, please contact me at lmalerba@moheganmail.com.

Sincerely,



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

cc: Jennifer Cooper, Director, Office of Tribal Self-Governance, IHS
TSGAC Members and Technical Workgroup
Jay Spaan, Executive Director, Self-Governance Communication and Education