February 7, 2017

The President
1600 Pennsylvania Avenue, NW
Washington, DC 20500

RE: Requesting an exemption from the Presidential Memorandum Regarding the Hiring Freeze for the Indian Health Service

Dear Mr. President:

On behalf of the National Council of Urban Indian Health (NCUIH), which represents urban Indian health care programs (UIHPs) across the nation that serve the 70% of American Indians and Alaskan Natives (AI/AN) who live in urban environs, we urge your Administration to exempt the Indian Health Service (IHS) from the federal hiring freeze imposed pursuant to your January 23 memorandum.

NCUIH, a 501(c)(3) organization devoted to the support and development of quality, accessible, and culturally-competent health care services for urban Indians, appreciates that your new Administration is obligated to carefully assess federal staffing requirements and we take no position on the hiring needs of other agencies because our expertise is limited to IHS.

UIHPs use a combination of in-house staff and outside consultants to provide health care services. While our programs are not staffed by federal employees, UIHPs share the concerns raised earlier by the National Indian Health Board and the National Congress of American Indians about the unintended consequences of the hiring freeze on IHS.

As is usually the case with broadly-applied rules, including the government-wide hiring freeze, there are unanticipated situations where exceptions should ultimately be made. NCUIH believes the hiring freeze will undermine IHS’ ability to perform its critical mission, especially given that the agency is already underfunded and understaffed. In fact, IHS may be as much as 20% short of health care providers (physicians, nurses, and other clinical providers), which both reduces access to care and undermines accreditation. A hiring freeze at IHS will only exacerbate the already intolerable situation your Administration inherited from its predecessors.
Moreover, there are senior positions in IHS’ Office of Urban Indian Health Programs which need to be filled expeditiously, particularly at a time when your Administration and the new 115th Congress are preparing sweeping health care reforms.

Fortunately, Indian Country’s concerns about the hiring freeze can be easily addressed. In fact, your Administration has already established a useful precedent through the establishment of broad exemptions from the hiring freeze for another important agency which also provides health care services.

Your January 23 memorandum wisely included an exemption from the hiring freeze for positions deemed “necessary to meet…public safety responsibilities”, which is understood to encompass the public health mission carried out by IHS. Ideally, IHS should be entirely exempted from the hiring freeze. Failing that, we urge you to provide IHS with broad authority to exempt its workforce. NCUIH commends your Administration for establishing broad exemptions for the Department of Veterans Affairs (DVA) from the hiring freeze, including 73 different health care-related job titles, employees at 24 facilities under construction, as well as employees responsible for the burial of veterans and their eligible family members.

Consistent with the federal government’s responsibility to provide the AI/AN community with health care services, as codified in the Indian Health Care Improvement Act, NCUIH asks you to at least provide IHS with discretion comparable to that already extended to DVA to safeguard the provision of health care services from the government-wide hiring freeze.

Please do not hesitate to contact Francys Crevier, Director of Governmental Affairs, at (202) 544-0344 / FCrevier@ncuih.org if you have any questions about our position on this important matter. Thank you for your service to the American people and for your consideration of our request.

Sincerely,

Ashley Tuomi
President, National Council of Urban Indian Health

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