

Indian Health Service

Portland Area – COVID-19 Funding FY2020

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ISDEAA SPECIALIST
JUNE 13, 2020
NPaiHB QBM - THD MEETING - VIRTUAL



Helpful Resources

- ❖ Dear Tribal Leader Letters – IHS Director
<https://www.ihs.gov/newsroom/triballeaderletters/>
- ❖ IHS COVID Resource Page: <https://www.ihs.gov/coronavirus/>
 - Links to guidance
 - Information on funding and usage
- ❖ <https://www.cdc.gov/>
- ❖ HHS/HRSA - Provider Relief Funds: <https://www.hhs.gov/coronavirus/cares-act-provider-relief-fund/index.html>

Meeting Objectives

1. Provide Overview of Funding **transferred through IHS** since COVID-19 Pandemic was declared in March 2020
2. Give general guidance on funding types and authorities.
3. Discuss appropriate uses of funds

DISCLAIMER: *this meeting information is general in nature if you have questions on specific requirements please consult with your Tribes legal counsel or independent auditor. IHS is available for limited guidance in relation to PSFA's and 638 applicability as well.*

Principles

- ❖ Make sure you are accurately accounting for COVID funds
- ❖ Should be for intended purpose in language of bill/amendment.
- ❖ CSC will be evaluated and calculated separately – Updated Templates are forthcoming
- ❖ These laws and associated funding do not supersede P.L. 93-638, the terms and conditions of the Contract/Compact still apply.

HHS Public Health and Social Services Emergency Fund – COVID-19 Response Activities

- ❖ Dear Tribal Leader Letter – March 27, 2020
 - ❖ \$70 million Federally managed – HQ and Direct Federal Sites
 - ❖ Directly transferred from HHS to address Public Health emergency
 - ❖ No allocation to Tribes or Urbans
- \$30 million to IHS Federal health programs in support of COVID-19 response activities. These funds will be distributed according to existing allocation methodologies that use recurring Federal Hospitals and Health Clinics base funding levels.
 - \$40 million to purchase personal protective equipment (PPE) and medical supplies through the IHS National Supply Service Center. These resources will provide critical PPE and medical supplies that will be available to I/T/U health programs free of charge

Families First Coronavirus Response Act (FFCRA) - COVID Testing Funds

- ❖ Dear Tribal Leader Letter – March 27, 2020
- ❖ \$64M – Available to I/T/U
- ❖ Distributed on or around – March 28, 2020
- ❖ 3 year funding from 2020-2022
- ❖ Cannot be used retroactively

Language from the Bill HR 6021: funds should be used specifically for testing or specific materials needed in the administering of tests. Also the amendment language states if it can't be used for those purposes it should be returned to the Area.

1. *In vitro diagnostic products (as defined in section 809.3(a) of title 21, Code of Federal Regulations) for the detection of SARS-CoV-2 or the diagnosis of the virus that causes COVID-19 that are approved, cleared, or authorized under section 510(k), 513, 515 or 564 of the Federal Food, Drug, and Cosmetic Act, and the administration of such in vitro diagnostic products.*
2. *Items and services furnished to an individual during health care provider office visits, urgent care center visits, and emergency room visits that result in an order for or administration of an in vitro diagnostic product described in paragraph (1), but only to the extent such items and services relate to the furnishing or administration of such product or to the evaluation of such individual for purposes of determining the need of such individual for such product.*

Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Pub. L. No. 116-136

- ❖ Dear Tribal Leader Letter – April 3, 2020 & April 23, 2020
- ❖ Two distributions on or around – April 7, 2020 & April 24, 2020
- ❖ Third Distribution for M&I & EQ specific – May 5, 2020
- ❖ 2 year funding from 2020-2021
- ❖ Funds available to prevent, prepare for, and respond to COVID-19

Language of the Bill: public health support, electronic health record modernization, telehealth and other information technology upgrades, Purchased/Referred Care, Catastrophic Health Emergency Fund, Urban Indian Organizations, Tribal Epidemiology Centers, Community Health Representatives, and other activities to protect the safety of patients and staff.

M&I and EQ – should follow rules of those fund types as well as used for COVID purpose

Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Pub. L. No. 116-136

- ❖ Dear Tribal Leader Letter – April 23, 2020
- ❖ Additional Centrally managed Funds
 - \$95 million - expansion of telehealth across I/T/U, including purchasing equipment, software, and services directly related to the delivery of telehealth;
 - \$26 million to support Tribal Epidemiology Centers and national surveillance coordination
 - \$6 million for public health support activities to broaden messaging about COVID-19 prevention, response, and recovery in Indian Country;
 - \$5 million to provide additional COVID-19 test kits and materials at no charge to I/TU.
 - \$10 million for non-clinical Federal staff support that will include deep cleaning, protection for non-clinical staff, and non-clinical staff overtime; and
 - \$30 million to address unanticipated needs in the near future.

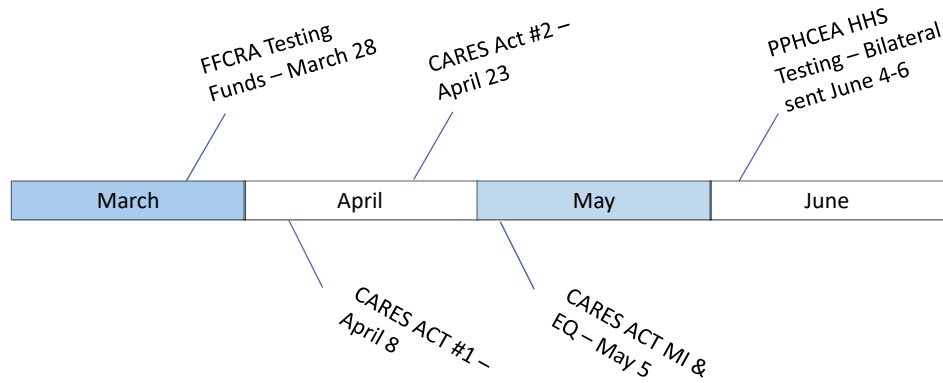
Paycheck Protection Program and Health Care Enhancement Act (PPPHCEA), Pub. L. No. 116-139

- ❖ Dear Tribal Leader Letter – May 19, 2020
 - ❖ Distribution – Pending Execution of Bi-lateral and receipt of Budget
 - ❖ Funding Available until expended
 - ❖ COVID-19 testing and testing-related activities transferred from the HHS Public Health and Social Services Emergency Fund (PHSSEF)
 - ❖ Unique requirements as these are not IHS appropriated Funds, they were transferred from HHS.
- **Purpose of Funds:** These funds can be used to develop, purchase, administer, process, and analyze COVID-19 tests, including support for workforce, epidemiology, and use by employers or in other settings. In addition, these funds can be used to scale up testing by public health, academic, commercial, and hospital laboratories, and community-based testing sites, health care facilities, and other entities engaged in COVID-19 testing. These funds may also be used to conduct surveillance, trace contacts, and perform other related activities related to COVID-19 testing.

(PPPHCEA), Pub. L. No. 116-139 – HHS Testing funds (cont.)

- ❖ All inclusive budget – No additional CSC will be calculated
 - Must reflect all Direct costs (staffing, equipment, supplies, contracts, etc.)
 - Include Indirect at current approved IDC rate.
 - Must total the award amount
 - May have additional activities over and above actual testing plan & cover a longer period of time (1-2 years since funds are “available until expended”)
- ❖ Testing plan within 30-days showing activities through Dec 2020
 - Plans are to demonstrate to HHS the specific activities tribes will undertake.
 - Period is from Award to December 2020
 - Should show how Tribe will help to ensure broad testing, as well as reopening of communities.

IHS Funding Timeline



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Other Items

- ❖ Rejection – if the Tribe doesn't feel they can meet requirements listed in amendment or funding bills, they need to work with the Area (Rena Macy) to return the funds.
- ❖ Please ensure you are submitting testing data.
 - Established survey in partnership with the NW Portland Area Indian health board.
<https://www.surveymonkey.com/r/NPAIHBCovid-19>
- ❖ Area Emergency Point of Contact – Roney Won, Roney.won@ihs.gov
 - Can work with tribes in obtaining supplies and communicating needs to NSSC

Questions Received to Date

1. Do Prevailing wages apply?
2. What about serving non-beneficiaries?
 - Treating During an emergency - 25 U.S.C. § 1680c(d)(2), to prevent the spread of communicable disease).
 - Authorization through ISDEAA – Contract/Compact
3. Do I have to use my CARES Act PRC funds for PRC patients?
4. How can testing-related funds can be utilized beyond testing supplies and PPE?
5. What are the reporting requirements ?
6. What if I don't' have a clinic am I eligible for funds?
7. Which funds can be used for development of mini-clinics and what parameters are there with short term (definition needed) vs. long term (definition needed)
8. Can I purchase a new facility?

Contact Information

We're here to help:

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