

INDIAN HEALTH SERVICE

IHM Directive Development¹

Coordination, Process, and Estimated Timelines

(Approximately 12-32 weeks of Program/Policy Coordinator collaboration, review, and clearance. Final agency clearance may add 30 to 90 days).

In an effort to improve and streamline the policy clearance process, this exhibit outlines the standard process for creating, reviewing, and revising Indian Health Manual (IHM) directives.

Policy Coordinators will coordinate efforts between Offices, Programs, Areas, and the Office of the General Counsel (OGC) for the utmost productivity. Coordination efforts with the Policy Coordinators will occur after the Program or Office Subject Matter Expert or other staff develops the proposed directive and submits the directive for review.

Below are the steps and estimated timelines when implementing Indian Health Manual 1-1:

<i>Process</i>	<i>Description</i>	<i>Timeline</i>
Initial meeting with HQ/Area Office Director, SU CEO (Program subject matter expert), Policy Coordinators, or Designee	<p>This meeting will identify the priority and intent of the new or revised directive including OD roll-out plans, meeting oversight Agency requirements, etc.</p> <p>Policy Coordinators will recommend a format for the IHM (Part/Chapter, Circular, or SGM).</p> <p><u>Program Office will describe the efforts to develop the proposed directive and identify other Offices, Area Offices, and/or Service Unit staff to be involved.</u></p> <p><u>Program Office provides POCs.</u></p> <p><u>The Program Office will send a draft to OGC and work with OGC prior to the submission of the directive to the Agency DDCO, Area Director, or Service Unit Chief Executive Officer. OGC requires approximately 15 business days for a preliminary review of a</u></p>	<i>30 min meeting</i>

¹ Due to the unique nature of each directive, processing timeframes and steps may vary.

Part 1, Chapter 1: Manual Exhibit 1-1-K – Policy Process

	<u>proposed directive, but additional time may be required for lengthy directives and complicated subject matter.</u>	
Policy Coordinators review of proposed directive	This will include a review of related policies currently in the IHM that may need to be referenced, superseded, rescinded, or incorporated into the policy. Consultation with the program office POCs as needed.	2 to 4 weeks
Distribution of the proposed policy within IHS for national review and comment	The amount of time for IHS’s national review and comment period will be determined in consultation between the Policy Coordinators and the Program Office. A minimum of 2 weeks for review and comment by all IHS Areas is recommended. A longer period – up to 3 months – may be needed if concurrent with Tribal consultation, or subject matter expert (SME) planned workgroups, etc.	2 to 12 weeks
Comment log preparation	Preparation by the Policy Coordinators of an official comment log and return to the Program Office POC for their review.	3 weeks
Review and disposition of comments	Program Office POC will recommend a response/disposition of all official comments. This includes possible resolution with another commenting Program Office and revision of proposed policy as warranted. Timing will depend on the volume and complexity of the comments and/or legal concerns raised by OGC. Program Office returns the completed comment log and revised draft directive to Policy Coordinators, including a track changes version and a clean version.	2 to 4 weeks
Draft documents	Program Office coordinates development of final drafts with Policy Coordinators & sends proposed directive (all pre-clearance documents) to designated reviewer.	3 days – 1 week
Pre and Final clearances	Program Office obtains pre and final review and clearance signatures from the Program Office management, OGC, and Policy Coordinators via email. The Program Office will send the final package clearance final approving signature.	4 weeks

	Pre-clearance and Final clearance submissions to the Office of the Director and Executive Secretariat Staff are sent via the Automated Tracking System for national directives.	
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Final clearances below have no standard timeline and are driven by various internal and external factors - adding a minimum of 30 days to possibly 90 days to the above timelines.

OGC

Preliminary review by OGC (with program offices) (approx. 15 business days)

Final review and clearance by OGC (if substantially similar to the version previously reviewed by OGC) (approx. 7 business days)

Final action before electronic distribution of signed policy (3 to 5+ days)

The IHS directives are posted to the HQ and Area web pages. Depending on the length and complexity of the directive, ensuring section 508 compliance and quality assurance of the accuracy/integrity of the posting process is usually completed within 5 days.

Program offices must provide Policy Coordinators with the final documents.

Policy Coordinators or designee will send the link to the IHM location for the new directive by email to the Directives and Delegations Control Officers and HQ Management team. The Program Office can provide additional distribution contacts, as appropriate.