IHS High-Risk Action Plan (HRAP) Update

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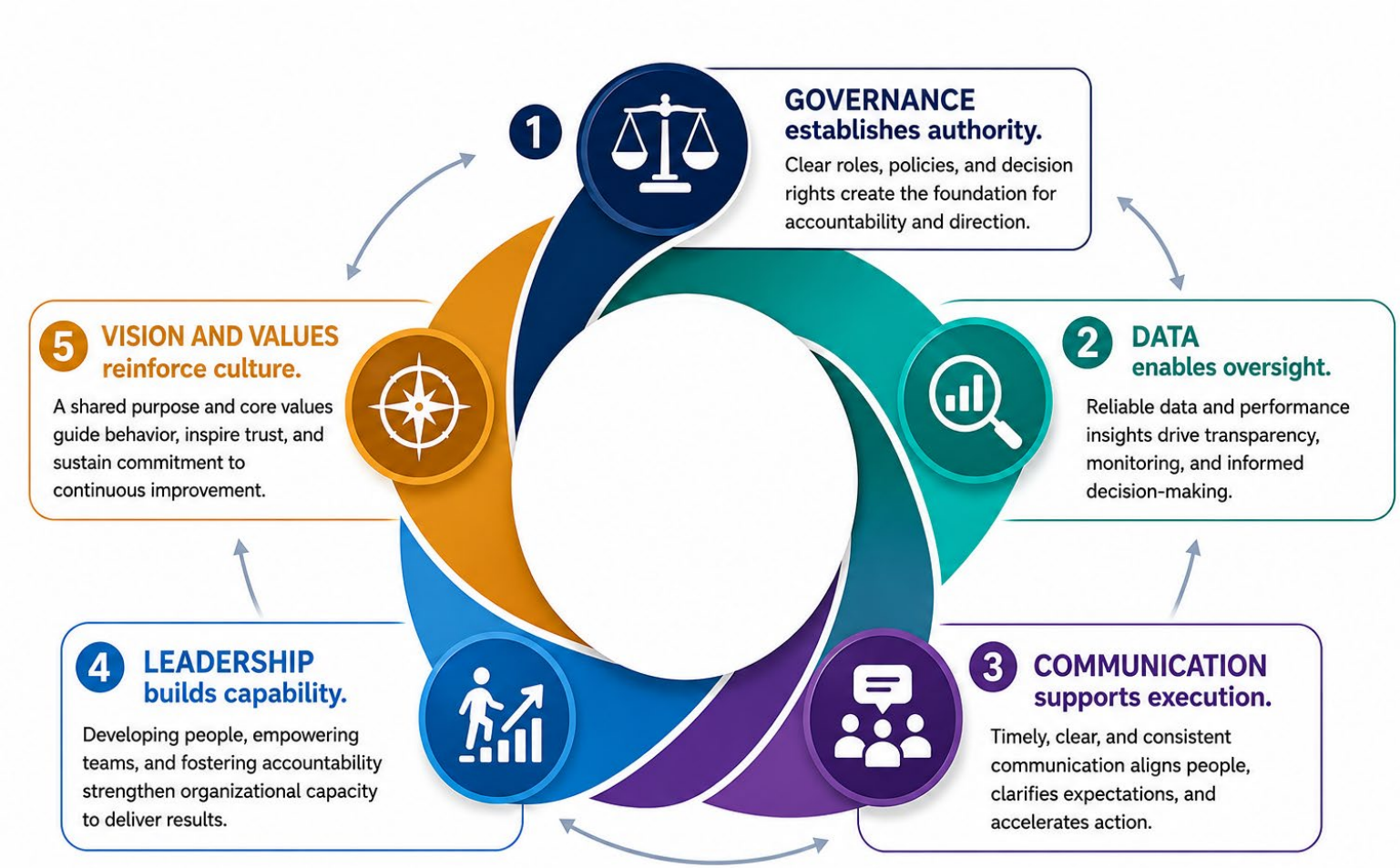
Background:

- In September 2022, IHS submitted an agency action plan to GAO for removal from the GAO High-Risk List. The action plan did not meet GAO criteria because it did not include strategies for addressing all the root causes IHS identified related to the oversight of federal programs and facilities.
- In November 2022, IHS changed its strategy to developing work plans in 2023 and 2024, but the work plans did not meet GAO's criteria because they did not reflect a longer-term vision for addressing the root causes.
- In December 2025, IHS submitted to GAO and published its Phase I action plan for removal from the GAO High-Risk List. In April 2026, IHS submitted to GAO and published the Phase II action plan.
- In June 2026, the HRAP workgroups completed designing the implementation plans to address the root causes and are the basis for Phase III HRAP. The implementation plans were presented to the Executive Leadership Team on July 8, 2026.

Available at https://www.ihs.gov/actionplanGAOHighRiskList/.

Stakeholder Views/Perceptions: A necessary element of the action plan, per GAO's direction, is to identify the senior official(s) responsible for implementing the corrective actions and reporting results.

Lanes of Effort



How we arrived here



Strategic Roadmap: Pathway to Activation

Begins a phased implementation that builds the governance structure needed to strengthen accountability, improve oversight, and support safe, high-quality care.



Leadership decision gates

Today	Endorse in principle + commit planning resources	**Gate A Sept 2026**	Approve final structures, charters, and pilot launch	**Gate B Dec 2026**	Approve agency-wide rollout based on pilot results

Monitor performance and optimize frameworks.

Accountable Leadership



Implementation Plan	Primary Owner(s)	Implementer/Operator(s)	SME/Technical Expert(s)
Agency Governance	IHS Director	HQ Leader (a) + Tier Leader (a)	Governance SME
Data Management & Access	CIO	HQ Leader (b)	Proposed Program Coordinator FTE
Internal Communication	Deputy Director	Tier Leader (b) + Enterprise Leader (a)	Proposed Internal Communications FTE
Proactive Leadership	DDHQERM and CMO	Tier Leader (c) + Enterprise Leader (b)	Career Development and Achievement Branch, OHR
Just Culture	DDHQERM and CMO	Tier Leader (d) + Enterprise Leader (c)	Michelle Livingston
Enterprise Risk Management	DDHQERM	Tier Leader (e) + Enterprise Leader (d)	Corbrett Hobson
Agency Vision and Values	IHS Director	HQ Leader (c) + Tier Leader (f) + Enterprise (e)	OHR + Internal Communications

HRAP Activity Executive Sponsors

Activities	Executive Sponsor
Develop an Agency Governance Strategy	Loretta Christensen, CMO; Jillian Curtis, CFO; Rose Weahkee, Associate DMO
Internal Communication	Darrell LaRoche, DDMO; Stacey Ecoffey, DDIEA; Beverly Cotton, DDFO
Implement an Agency Document Management Systems and Updates Workgroup	Darrell LaRoche, DDMO; Michelle Boylan, DDQHERM
Establish national ERM framework and agency training	Michelle Boylan, DDQHERM
Establish Senior Assessment Team	Michelle Boylan, DDQHERM
Expand tracking of non-clinical risk and closure	Michelle Boylan, DDQHERM
Develop Leadership Competency across the Agency	Darrell LaRoche, DDMO, Loretta Christensen, CMO; Lisa Gyorda, OHR Director
Integrate Just Culture Principles throughout the Agency	Michelle Boylan, DDQHERM; Kelly Battese, DDFO; Joe Bryant, DDFO
Enhance improvement principles knowledge and application throughout the agency	Michelle Boylan, DDQHERM
Inventory existing available agency data in the form of dashboards, reports, etc.	Michelle Boylan, DDQHERM; Mitch Thornbrugh, CIO
Create a ‘landing page’ / consolidated location of the currently available data tools	Michelle Boylan, DDQHERM; Mitch Thornbrugh, CIO
Identify and prioritize critical data gaps and how they might be filled with existing tools/systems or new technology/data capture approaches	Michelle Boylan, DDQHERM; Mitch Thornbrugh, CIO
Resolve the critical data gaps to enable the agency to make data driven decisions	Michelle Boylan, DDQHERM; Mitch Thornbrugh, CIO
Agency Vision and Values	Ben Smith, DD

Governance, Internal Communication & Data Management and Access

Focus Area	Activity	Outcome	Status	Date
Governance	Implementation Plan	Plan developed, including the proposed Integrated Governance Framework milestones, resources, measures, accountability, and communication plan.	Complete	6/12/2026
Internal Communication	Implementation Plan	Plan that identifies Stakeholders, detailed resources required, additional KPI, implementation road map with milestones, governance and accountability structure and communication plan.	On-Track	6/12/2026
Internal Communication	Previous communication workgroup products	Identification of lessons learned and best practices related to communication.	On-Track	6/12/2026
Internal Communication	Document Management Systems	Charter workgroup with scope/authority/support to implement document management system and oversee IHM/guidance updates.	Complete	4/30/2026
Data Management and Access	Implementation Plan	Detailed Implementation Plan to identify agency-wide resources for all HRAP, master timeline and focused efforts without overlap between the sub-workgroups	On-Track	6/12/2026

Proactive Leadership

Focus Area	Activity	Outcome	Status	Date
Proactive Leadership	Implementation Plan	Detailed Implementation Plan to identify agency-wide resources for all HRAP, master timeline and focused efforts without overlap between the sub-workgroups	Complete	6/12/2026
Proactive Leadership	ERM Framework	Agency will have an ERM strategy with identified roles and responsibilities and tools to deploy to support consistent risk prioritization and escalation that can be integrated into governance and decision-making.	Complete	9/30/2026
Proactive Leadership	Risk Register	A systematic way to identify agency risk with identified POC across the agency.	On-Track	11/30/2026
Proactive Leadership	Senior Assessment Team (SAT)	SAT charter approved and SAT performing routine enterprise risk surveillance and internal controls management and tracks actions to closure.	Complete	4/15/2026
Proactive Leadership	Leadership Competency Framework	Standardized leadership competencies aligned to the Tier 1-5 leadership model (Leading Self, Leading Projects, Leading Teams, Leading Programs, and Leading Organizations). Align competencies with operational compliance, Just Culture, quality, workforce, governance, and succession planning expectations.	Complete	6/30/2026
Proactive Leadership	Enterprise Leadership Curriculum	Training curriculum with programs for each Leadership Tier that staff can take to develop leadership skills.	On-Track	10/28/2026
Proactive Leadership	C-Suite Bootcamp	A dedicated leadership training program for C-Suite Leaders of federally operated healthcare systems to ensure consistent understanding of critical processes and standards.	On-Track	9/30/2027

Just Culture

Focus Area	Activity	Outcome	Status	Date
Just Culture	Leadership Rounding Expectations	The agency will have written expectations to hold leaders accountable to for completing Leadership Rounding.	In Progress	8/31/2026
Just Culture	AHRQ Survey on Patient Safety Culture	The agency will have a consistent way to assess changes in Patient Safety Culture across the organization and requirement for Leaders to take concrete steps to improve Patient Safety Culture based on the results.	In Progress	9/1/2026
Just Culture	Leadership Safety Commitment Statement	The Leadership Safety Culture Commitment establishes a common leadership standard centered on trust, shared accountability, continuous learning, system improvement, and an environment where employees can identify risks and speak up without fear of retaliation.	In Progress	9/1/2026
Just Culture	Just Culture Champion Training	The agency will have staff champions with training in Just Culture to support leaders and staff with training.	In Progress	9/1/2026
Just Culture	Just Culture Policy	The agency will have a written policy in the Indian Health Manual outlining expectations for Just Culture to hold all staff accountable to.	On-Track	12/31/2027
Just Culture	Patient Safety Officers	The agency will have minimum staffing requirements for Patient Safety Officers to ensure full implementation of all Patient Safety Program requirements.	On-Track	12/31/2026
Just Culture	Just Culture Training – Leaders	All identified leaders in IHS will have completed standard Just Culture for Leaders training.	On-Track	12/31/2026
Just Culture	Just Culture Training – Staff	All staff in IHS will have completed training in Just Culture.	Started	6/30/2027
Just Culture	Just Culture Decision Tool	Supervisors will have a toolkit for how to approach situations utilizing a Just Culture algorithm.	On-Track	6/30/2027
Just Culture	Improvement Principles and Methods Training	Identified staff throughout the agency will complete improvement training to improve system safety.	On-Track	9/30/2027

Vision & Values

Focus Area	Activity	Outcome	Status	Date
Vision & Values	Implementation Plan	Detailed Implementation Plan to identify agency-wide resources for all HRAP, master timeline and focused efforts without overlap between the sub-workgroups	Complete	6/12/2026
Vision & Values	Input and Engagement	Identification of existing statements that can be incorporated into the agency Vision and Values statements.	Complete	8/19/2026
Vision & Values	Draft Values and Statements	A draft of a compelling vision statement that can be used to create agency unity and shape organizational culture.	Complete	9/16/2026
Vision & Values	Core Agency Values	A clear set of agency values that will be used to establish the agency culture and framework for daily behaviors and decision making.	In Progress	10/1/2026
Vision & Values	Rollout Toolkit for Implementation	Standardized Toolkit for the integration of the values that leads to organizational culture change, motivates employees and provides a framework for daily decision making.	In Progress	10/31/2026


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