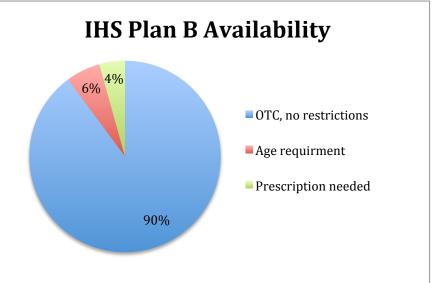
## Indian Health Service and Tribal Health Center Plan B Accessibility Survey

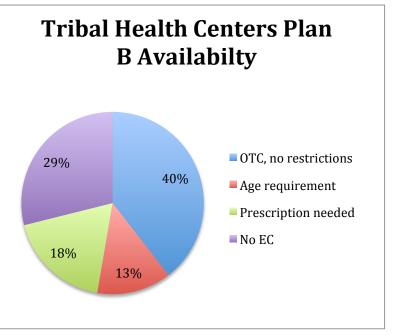
From September 2016 to May 2017, the Native American Women's Health Education and Resource Center (NAWERC) surveyed Indian Health Service (IHS) and tribal facilities (Non-IHS) to assess if the policies for dispensing Plan B Emergency Contraceptive (or its equivalent) are in compliance with the FDA. This survey included 69 IHS facilities in the Phoenix, Tucson, Billings, Great Plains, Albuquerque, Navajo, Bemidji, and Oklahoma City areas and 76 tribal facilities in the states of Wisconsin, Minnesota, Arizona, Montana, South Dakota, New Mexico, and

Oklahoma.

In 2013, the FDA approved Plan B to be provided as an emergency contraception as an over-thecounter (OTC) medication without a minimum age requirement. The IHS implemented this policy on October 15, 2015. As of Mav 2017, most (90%) of IHS facilities adhere to this. Ten percent of IHS facilities are still not in compliance. Six percent impose an age requirement to pick up Plan B. Four percent require patients of all ages to get a prescription, which means seeing a health care provider.

The facilities designated "tribal health centers" comprise health care centers that receive funding from IHS. This includes tribally run centers, urban Indian health centers and nongovernmental organization centers. Only 40% of these facilities provide Plan B as OTC without restrictions. Thirteen percent of these facilities document in the patients' charts that Plan B was dispensed. Although these facilities are included in the category of "OTC, no restrictions", it should be noted that the patients at these pharmacies are





\* Nineteen of the tribal/urban health centers surveyed did not have a pharmacy and referred patients to facilities with pharmacies. Their data was not included in this study. One of these facilities carried Plan B.

\*\* Nine tribal facilities had phone lines that were completely automated and information about their pharmacies was unavailable. These centers were not includes in this study.

not provided the same discretion that they would have at other pharmacies. Most (60%) of tribal facilities are not in compliance with the IHS protocol. Thirteen percent of facilities have a minimum age requirement ranging from 13 to 18. Eighteen percent require a prescription for all ages. Twenty-nine percent of tribal facilities did not carry Plan B in the pharmacy. Some reasons for the restrictions on Plan B access include having a closed formulary, requiring a provider script for *all* medications that are normally OTC, using prescriptions to "keep track" of medications, and lack of knowledge about the FDA policy on Plan B.

Most of the facilities (91%) that did not provide Plan B were in Oklahoma, particularly in the Creek, Chickasaw, and Shawnee nation health centers. The reason given for not having any emergency contraceptive was that it was "not on the formulary." The pharmacists/technicians at many of the facilities suggested going to a pharmacy or health clinic outside the tribal system. Many pharmacists/technicians also suggested that patients should contact their health care provider if they are seeking emergency contraception.

## **Recommendations for IHS Facilities**

Although it is commendable that 90% of IHS pharmacies are in compliance with the FDA, there should be 100% compliance. Below are the Plan B Report Card scores showing the level of compliance of the "out of compliance" IHS facilities. It is strongly recommended that these facilities comply with the FDA recommendations for Plan B accessibility.

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points per variable	N Provides Plan B	o Given as OTC	۲۰ Provider Visit Requir	$_{\omega}$ Age: 13-15 and up	$_{ m N}$ Age: 16-17 and up	ы. Аge: 18 and up	م No Age restriction	Total Points	Grade
Fort Yuma Service Unit (Winterhaven, CA)	2	2	0	0	0	1	0	5	С
San Xavier Health Center (Tucson, AZ)	2	0	1	0	0	0	0	3	D
Fort Belknap Service Unit (Harlem, MT)	2	2	0	0	2	0	0	6	В
Sisseton-Wahpeton Service Unit (Sisseton, SD)	2	0	1	0	0	0	0	3	D
Lower Brule Health Center (Lower Brule, SD)	2	2	0	0	2	0	0	6	С

Fort Yuma Service Unit required anyone under the age of 18 to be accompanied by an adult when picking up Plan B. The San Xavier Health Center required a prescription to receive Plan B. The Fort Belknap Service Unit would only give Plan B over the counter to individuals over the age of 16. The Sisseton-Wahpeton Service Unit required all individuals to see a nurse to determine if they could receive Plan B. The Lower Brule Health Center does not allow anyone under the age of 16 to pick up any medication.

## **Recommendation for Tribal Health Centers**

It is also strongly recommended that the tribal health facilities comply with the FDA policy. Even though tribal health facilities receive federal funding from the IHS, most do not adhere to the guidelines for dispensing Plan B. It is important that the IHS enforces this policy on all health centers that receive IHS funding. IHS funds are federal dollars and, therefore, tribes should comply with federal policies. Below is the Plan B Report Card for the tribal health facilities that were surveyed.

points per variable	A Provides Plan B	c Given as OTC	Provider Visit Required	$_{\omega}$ Age: 13-15 and up	$_{ m N}$ Age: 16-17 and up	Here and up	$_{ m Gr}$ No Age restriction	Total Points	Grade
Tribal Non-IHS Pharmacies									
WisconsinBad River Health Center (Ashland, WI)House of Wellness Clinic (Baraboo, WI)Oneida Health Center (Hobart, WI)Red Cliff Community Health (Bayfield, WI)Ho-Chunk Nation Health Department (Black River Falls, WI)Pete Christensen Health Center (Lac Du Flambeau, WI)Stockbridge-Munsee Band of Mohican (Bowler, WI)La Courte Oreilles Health Center (Hayward, WI)	2 2 2 2 2 2 2 2 2 2	0 2 0 2 2 0 2 2 2	1 0 1 0 1 0 0	0 0 0 0 0 0 0	0 0 0 0 0 2 0	0 0 0 0 0 0 0	0 5 5 0 0 5	3 9 3 9 3 6 9	D A D A D C A
Menominee Tribal Clinic (Keshena, WI)	2	0	1	0	0	0	0	3	D
St. Croix Health Services (New Richmond, WI) Potawatomi Health and Wellness Center (Crandon, WI)	2 2	2 2	0	0 0	0 0	0 0	5 5	9 9	A A
<u>Minnesota</u> Bois Forte Clinic (Net Lake, MN) Shakopee Dakota Clinic (Prior Lake, MN) Prairie Island Family Health Clinic (Welch, MN) Lower Sioux Community (Morton, MN) Fond Du Lac Human Services Pharmacy (Duluth, MN) Mille Lacs Band of Ojibwee Ne-la-Shing Clinic (Onamia, MN)	2 2 0 2 2 2	0 2 0 2 0 2	1 0 0 1 0	0 0 0 0 0	0 0 0 0 2	0 0 0 0 0	0 5 0 5 0 0	3 9 0 9 3 6	D A F D C
Arizona Gila River Health Care (Sacaton, AZ) Komatke Health Center (Laveen Village, AZ) Parker Indian Health Center (Parker, AZ) Peach Springs Indian Health Center (Peach Springs, AZ) Sacred Peaks Health Center (Flagstaff, AZ) San Carlos Indian Hospital (Peridot, AZ) Winslow Indian Health Care Center (Winslow, AZ) Fort Mojave Indian Health (Mohave Valley, AZ) Tsehootsooi Medical Center (Fort Defiance, AZ) Nahata Dziil Health Center (Sanders, AZ) Sage Memorial Hospital (Ganado, AZ) Tuba City Indian Medical Center (Tuba City, AZ) Wassaja Tribal Clinic (Fort McDowell, AZ) Dilkon Health Center (Dilkon, AZ) Leupp Health Center (Leupp, AZ)	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 1 0	0 3 0 3 0 0 3 0 0 3 0 0 3 0 0 3 0 0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 5 5 5 5 0 5 5 5 5 5 5 0 5	5 7 9 7 9 9 7 9 9 7 9 9 7 9 9 7 3 9 7 3 9	C B A A B A A D B A A A B D A
<u>South Dakota</u> Flandreau Santee Sioux Tribal Health Center (Flandreau, SD)	2	0	1	0	0	0	0	3	D

Mantana	Provides Plan B	Given as OTC	Provider Visit Required	Age: 13-15 and up	Age: 16-17 and up	Age: 18 and up	No Age restriction	Total Points	Grade
<u>Montana</u> Heart Butte Health Station (Browning, MT)	2	2	0	0	0	0	5	9	А
Polson Tribal Health Center (Polson, MT)	2	2	0	0	0	0	5	9	A
Eagle Child Health Center Pharmacy (Hays, MT)	2	2	0	0	0	0	5	9	A
Flathead Tribal Health (St. Ignatius, MT)	2	2	0	0	0	0	5	9	А
Rocky Boy Tribal Health (Box Elder, MT)	2	0	1	0	0	0	0	3	D
<u>New Mexico</u>									
Pine Hill Health Center (Pinehill, NM)	2	2	0	0	0	0	5	9	Α
Sandia Health Clinic Pharmacy (Bernalillo, NM)	2	2	0	3	0	0	0	7	В
Santo Domingo Indian Health Service (Santo Domingo, NM)	2	0	1	0	0	0	0	3	D
Jemez Pueblo Health Center (Jemez Pueblo, NM)	0	0	0	0	0	0	0	0	F
<u>Oklahoma</u>									
Sam Hider Health Center (Jay, OK)	2	0	1	0	0	0	0	3	D
Will Rogers Health Center (Nowata, OK)	2	2	0	0	0	0	5	9	А
A-Mo Health Center (Salina, OK)	2	2	0	0	0	0	5	9	A
Vinita Health Center (Vinita, OK)	0	0	0	0	0	0	0	0	F
Cooweescoowee Health Center (Ochelata, OK)	2	2 0	0	0	0	0	5	9 3	A D
Hugo Clinic (Hugo, OK) Idabel Clinic (Idabel, OK)	2 0	0	1 0	0 0	0 0	0 0	0 0	3 0	F
Carl Albert Indian Hospital (Ada, OK)	0	0	0	0	0	0	0	0	F
Tishomingo-Chickasaw Health Center (Tishomingo, OK)	0	0	0	0	0	0	0	0	F
Pawhuska Health Center (Pawhuska, OK)	2	2	0	0	0	0	5	9	A
Redbird Smith Indian Health Center (Sallisaw, OK)	2	2	0	0	0	0	5	9	A
Wilma Mankiller Health Clinic (Stilwell, OK)	2	2	0	0	0	0	5	9	A
Oklahoma City Urban Indian Clinic (Oklahoma City, OK)	2	2	0	3	0	0	0	7	В
Indian Health Care Resource Center (Tulsa, OK)	0	0	0	0	0	0	0	0	F
Three Rivers Health Clinic (Muskogee, OK)	2	2	0	0	0	0	5	9	А
White Eagle Health Center (Ponca City, OK)	0	0	0	0	0	0	0	0	F
Creek Nation Community Hospital (Okemah, OK)	0	0	0	0	0	0	0	0	F
Absentee Shawnee Tribal Clinic – Shawnee (Shawnee, OK)	0	0	0	0	0	0	0	0	F
Absentee Shawnee Tribal Clinic – Norman (Norman, OK)	0	0	0	0	0	0	0	0	F
Ardmore Chickasaw Health Clinic (Ardmore, OK)	0	0	0	0	0	0	0	0	F
Durant Health Center (Durant, OK) Purcell Indian Health Clinic (Purcell, OK)	0 0	0 0	0 0	0 0	0 0	0 0	0 0	0 0	F F
WW Hastings Hospital (Tahlequah, OK)	2	0	1	0	0	0	0	3	D
Citizen Potawatomi Nation Clinic (Shawnee, OK)	2	2	0	0	0	0	5	9	A
Perkins Family Clinic (Perkins, OK)	2	2	0	3	0	0	0	7	В
Kanza Health Clinic (Newkirk, OK)	0	0	0	0	0	0	0	0	F
Kickapoo Tribal Health Center (McLoud, OK)	0	0	0	0	0	0	0	0	F
Eufaula Indian Health Center (Eufaula, OK)	0	0	0	0	0	0	0	0	F
Koweta Indian Health Center (Coweta, OK)	0	0	0	0	0	0	0	0	F
Black Hawk Health Center (Stroud, OK)	0	0	0	0	0	0	0	0	F
Bearskin Health Center (Wyandotte, OK)	0	0	0	0	0	0	0	0	F
Choctaw Nation Healthcare Center (Talihina, OK)	0	0	0	0	0	0	0	0	F
McAlester Clinic (McAlester, OK)	0	0	0	0	0	0	0	0	F
Wah-Zha-Zhi Health Center (Pawhuska, OK)	2	2	0	0	0	0	5	9	A

The points given ranged from 0 (as the lowest) through 9 (as the highest).

Scale:	Points: 9	8-7	6-4	3-1	0
	Grade: A	В	С	D	F