
October 23, 2020

Thomas J. Engels
Administrator
Health Resources and Services Administration
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Dear Mr. Engels:

The Western Governors' Association (WGA) submits the following comments to the Health Resources and Services Administration (HRSA) on the proposed modifications detailed in its notice, Revised Geographic Eligibility for Federal Office of Rural Health Policy Grants (85 FR 59806). WGA represents the Governors of the 22 westernmost states and territories and is an instrument of the Governors for bipartisan policy development, information-sharing and collective action on issues of critical importance to the western United States.

The modifications would affect how the Federal Office of Rural Health Policy (FORHP) designates areas as eligible for its rural health grant programs. WGA appreciates FORHP's commitment to ensuring that there are clear, consistent and data-driven methods for defining rural areas in the United States. Western Governors support the proposed change to FORHP's definition of rural areas, which expands the number of counties eligible for the Office's rural health grant programs.

Western Governors have raised concerns about the difficulty of targeting federal resources for rural communities and the challenges rural areas face in accessing these resources. WGA Policy Resolution 2020-07, *Rural Development*, highlights these concerns and encourages federal agencies to work with states to thoroughly evaluate program requirements and address programmatic barriers encountered by rural applicants. County-based definitions of rural areas can be imprecise, particularly in the West, where counties tend to be much larger than in other parts of the country. The proposed modification responds to the Governors' concerns by expanding eligibility to communities that are rural in character and lack health care services but are excluded under the current definition. Revising the geographic eligibility for FORHP grants will increase access to health care for underserved populations and build capacity in rural areas.

Western Governors submit these remarks through the public notice and comment process for administrative recordkeeping purposes. The Governors, however, maintain that this process is an insufficient channel for state-federal communication on federal actions that may affect state authority or administrative activity. Western Governors strongly urge you to engage in early, meaningful, substantive and ongoing consultation with states in advance of any such decisions or related public processes. Consultation will result in more effective, efficient, and resilient federal policy, benefiting our shared constituents.

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Thank you for your attention to this matter. Please let us know how Western Governors may be of assistance in this effort.

Sincerely,



Kate Brown
Governor of Oregon
Chair, WGA



Brad Little
Governor of Idaho
Vice Chair, WGA