

**Supporting Statement for the
Indian Health Service Loan Repayment Program and
Supporting Regulations Contained in
42 CFR, USC25, 1616a.**

Background

The Indian Health Service (IHS) Loan Repayment Program (LRP) identifies health professionals with pre-existing financial obligations for education expenses that meet program criteria and who are qualified and willing to serve at, often remote, IHS health care facilities. Under the program, eligible health professionals sign a contract under which the IHS agrees to repay part or all of their indebtedness for professional training education. In exchange, the health professionals agree to serve for a specified period of time in IHS health care facilities.

A. Justification

1. Need and Legal Basis

This program is necessary to augment the critically low health professional staff at IHS health care facilities. Any health professional wishing to have their health education loans repaid, may apply to the IHS Loan Repayment Program. A two-year contract obligation is signed by both parties, and the individual agrees to work at an IHS location and provide health services to Native American and Alaska Native individuals

This information is authorized to be collected by Section 108 of Public Law (P.L.) 94-437, the Indian Health Care Improvement Act, as amended.

2. Information Users

This information collection activity will eventually enable the IHS the use of electronic information technology in every circumstance.

The following revisions were made to the previously approved LRP booklet:

- The booklet cover design was changed.
- Entirely new photographs were added.
- The entire application font is smaller and color was added.
- Each separate section of the booklet now has a title.
- The applicant's email line was added to Section I.
- The Recruiter information was revised.

The information collected from individuals is analyzed by the LRP staff, and a score

is given to each applicant. This score will determine which applicants will be awarded each fiscal year. The administrative scoring system assigns a score to the geographic-location according to vacancy-rates for that fiscal year and also considers whether the location is in an isolated area. When an applicant takes employment at a location, they in turn “pick-up” the score of that location. Once scores are assigned to the applicants, loan repayment is awarded to those with scores above 70 for a time. The awardee’s then sign 2-year contracts obligating them to work at their locations, and in return the Agency pays of their tuition loans.

This request for information collection has been approved in previous years since 1988.

3. **Improved Information Technology:**

Each year consideration is given to the use of technology to collect this information in order to reduce any burden to the applicants. However, due to the remote and very often isolated areas of the Country in which many of the applicant’s live and work, (Native American Reservations and Eskimo/Aleutian villages) the IHS is placed in a “Special Circumstance Category.”

As these remote areas slowly become equipped and are able to maintain electronic data processing, storage and transmission, the possibilities of finally becoming completely automated become a closer reality with each new year.

4. **Duplication of Similar Information**

Duplication is not an issue. There is no similar information available which can be used or modified to meet the information needs of this program. The information requested on the IHS LRP application is specific to the applicant and unique to this program.

5. **Small Businesses**

This information will not involve the collection of information from small businesses.

6. **Less Frequent Collection**

If the information were collected less frequently, the ability of the IHS LRP, to identify and select qualified health professional applicants to fill priority health professional vacancies as needed at IHS health care facilities, would be harmed. The information collection must be completed every fiscal year, once a year.

7. **Special Circumstances**

As described in #3, Improved Information Technology, the IHS is considered a “Special Circumstance” status.

This information collection will be consistent with the guidelines in 5 CFR 1320.5(d) (2).

8. Federal Register Notice/Outside Consultation

A 60-day Federal Register Notice was published on October 17, 2008 (73 FR 61877). No public comments were received.

OUTSIDE CONSULTATION: The program surveyed the following non-agency individuals to obtain constructive feedback to improve the application, improve efficiency, and minimize the collection burden. The comments on the clarity and ease of completion of the forms were positive. There were no suggestions for improvement nor any major problems identified.

The consultations took place in 2008. The following are the names, titles, phone numbers, and e-mail addresses of those consulted.

| | |
|---|--|
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In addition, the following IHS Loan Repayment Review Committee members reviewed and verified the estimated burden response for this information collection:

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9. Payment/Gift to Respondents

The respondents of this information collection will not receive any payments or gifts for providing the information.

10. Confidentiality

The information collected through the IHS LRP application process are maintained in accordance with the Health and Human Services system notice 09-17-0002, "Indian Health Service Scholarship and Loan Repayment Program, HHS/IHS/OHP." The Privacy Act notification statement will be contained in the LRP Information and Application Booklet. Applicants will be assured that their records will be maintained in accordance with the provisions of the Privacy Act.

11. Sensitive Questions

There are no questions of a sensitive nature solicited in this information collection. Respondents are requested to voluntarily provide their Social Security Number (SSN) and informed that if awarded an IHS loan repayment, under the Debt Collection Act, the SSN must be provided, otherwise their application will be considered incomplete.

12. Burden Estimate (Total Hours & Wages and Costs)

12A. Estimated Burden Hours

| Estimated Burden Hours | | | | |
|-----------------------------------|-------------------------------------|---------------------------------|--|--------------------------------|
| Data Collection Instrument | Estimated No. of Respondents | Responses per Respondent | Average Burden Hour per Response* | Total Annual Burden Hrs |
| LRP Application | 510 | 1 | 1.5 hours | 765 |
| Total | 510 | 1 | 1.5 hours | 765 |

Annual Information Collection Costs to Respondents:

There is no costs to respondents, other than the their time to voluntarily complete the IHS LRP application process.

12B. Estimate of annualized costs to respondents for the hour burdens for collections of information.

| Type of Respondent | Total Burden Hours | Hourly Wage Rate | Total Respondent Cost |
|---------------------------|---------------------------|-------------------------|------------------------------|
| Health Care Professional | 765 | \$32 | \$24,480 |
| Total | 765 | \$32 | \$24,480 |

This information collection places no additional computer or record keeping requirements upon the respondents. Therefore, the estimated total annual cost burden to respondents or record keepers for capital and start-up costs components (annualized over the expected useful life) for this information collection is zero.

The information collection will not require the purchase of any capital equipment nor create any start-up costs. Once available in electronic format, this process will allow applicants to choose this type of collection. This information collection is part of the respondents' customary and usual business practices, and, therefore are not included in the estimate.

The estimated total cost burden to respondents or record keepers for operation and maintenance, and purchase of services components for this information collection is zero. The information collection will not create costs associated with generating, maintaining, and disclosing or providing the information.

13. Capital Costs (Maintenance of Capital Costs)

The cost estimate is reflected into two components.

- a) The total capital and start-up costs components which is not an issue due to the use of all existing hardware and software.
- b) The total operation and maintenance associated with generating, maintaining, and disclosing information again is not an issue due to in-house, existing staff and equipment and software. The expected useful life of capital is infinite.

14. Cost to Federal Government

The annual cost to the Federal Government for this information collection is the cost of maintaining capital associated with this information collection is based on the annual printing and mailing of the applications; and, the staff time to perform the initial screening of each application and a thorough review and analyze of each of the remaining applications. Cost based on \$30.00 per hour average of professional and clerical/secretarial hourly rates combined. The estimated annual cost to the Federal government is as follows:

| <u>ITEM</u> | <u>HOURS</u> | <u>COST</u> | |
|----------------------------------|--------------|-------------|----------|
| Printing/Mailing Applications | 2,500 | | \$ 7,900 |
| Screening (425 x .167 x \$30/hr) | 5,000 | 10,400 | |
| Review (425 x 1.0 x \$30/hr) | 10,000 | | 15,800 |
| Estimated annual capital cost: | | | \$34,100 |

15. Program or Burden Changes

The information collections hours increased slightly from the previous amount due to an increase in popularity of the Program and more applicants applying to the Program.

16. Publication and Tabulation Dates

Information collected and tabulated is used by the IHS LRP for internal program planning, management and evaluation purposes. There are no plans for publication of this information.

17. Expiration Date

The OMB approval number and expiration date will be displayed on the information collection.

18. Certification Statement

There are no exceptions to the certification.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used in this collection.

Since the IHS is in a "Special Circumstance" status, and those areas that receive and where information is collected from, are not yet completely automated, there are no current plans to use

statistical methods in this collection of information.

The Agency has determined that the need to use statistical methods during this collection of information at this time of the process, will not reduce the burden of applicants, nor will it improve the accuracy of the results. Once actual Loan Repayment awards are made however, the Program and the Agency report those statistics and relevant data to Congress.

- 1. Respondent Universe and Sampling Methods**
- 2. Procedures for the Collection of Information**
- 3. Methods to Maximize Response Rates and Deal with Nonresponse**
- 4. Tests of Procedures or Methods to be Undertaken**
- 5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data**

List of Attachments

Attachment 1:

Authorizing Legislation for the Indian Health Service Loan Repayment Program.

Attachment 2:

IHS LRP Information and Application Booklet

Attachment 3

Federal Register 60-Day Notice (U.S.C. 3506(c)(2)(A))

67 FR 53956, published August 20, 2002

Attachment 4

Federal Register 30-Day Notice (U.S.C. 3507(a)(1)(D))

Proposed notice.

Attachment 1

Authorizing Legislation for the Indian Health Service Loan Repayment Program.

Attachment 2

IHS LRP Information and Application Booklet

Attachment 3

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Attachment 4

Federal Register 30-Day Notice (U.S.C. 3507(a)(1)(D))

Proposed notice.