Supporting Statement for IHS Scholarship Program Application

A. JUSTIFICATION

l. <u>Circumstances Making the Collection of Information Necessary</u>:

The Indian Health Service (IHS) is requesting a revision of a previously approved information collection activity; 0917-0006, "IHS Scholarship Program Application". Approval of this collection will expire on 2/28/2011.

The IHS Scholarship Program data collection instruments have been changed to standardize formatting across all forms, improve ease of use by applicants, and improve efficiency of processing by federal employees. The changed forms are IHS: 856; 856-2; 856-3; 856-4; 856-5; 856-6; 856-7; 815; 816; 817; 856-8; 856-9; 856-11; 856-12; 856-13; 856-15; 856-16; 856-17; 856-18; 856-19; 856-20; and 856-21.

The new IHS Scholarship Program data collection instruments have been created according to the new standardized formatting and will formalize required student requests and reports for inclusion in their official scholarship file. The newly created forms are IHS: 856-10; 856-14; 856-22; 856-23; and 856-24.

This information is collected under the Indian Health Care Improvement Act, Public Law 94-437, as amended. The Act authorizes the conduct of the Health Professions Preparatory Scholarship Program for Indians, the Health Professions Pre-graduate Scholarship Program, and the Health Professions Scholarship Program to train the health professional personnel necessary to staff IHS health programs and other health programs serving the American Indian and Alaska Native (AI/AN) people in occupational categories and geographic locations where there are health manpower shortages (Attachment 1).

2. Purpose and Use of Information Collection:

The information collection is used to plan, manage, direct, operate and evaluate the agency's scholarship programs. The forms contained in the booklet and handbook discussed below are used to solicit and process program applications (Attachment 2).

A. IHS Scholarship Program Application Information Instruction Booklet

This booklet provides an overview of the scholarship programs, eligibility requirements, selection criteria and ranking procedures for recipients and it contains the instructions and forms that need to be completed and submitted by all program applicants. The forms are discussed in the order as provided in the booklet.

Form IHS-856, "Application for Participation in the Indian Health Service Scholarship Program." The form IHS-856 is the initial application form and must be completed by each applicant. The information provided from this form is used to establish a demographic and educational profile of each applicant and includes: type of scholarship, health career, date of graduation, Tribal affiliation, full-time/part-time status, etc. This information is entered into IHS's scholarship management information system and provides a base for the rating/ranking and eligibility procedures used to make an award. Added ""Email Address" on page 5; this page was added for more contact information on the applicant. Also added, "on page 8, 7b. "IMPORTANT: Indicate the month and year. Be sure to darken in the month and year of your expected completion of the required course work or graduation date." This statement was added to further indicate what is required on this form, in order for the applicant to understand that the graduation date is necessary for it to be complete.

Form IHS 856-2, "Application Checklist." Applicants complete and sign this form to indicate that their scholarship application is complete. It is considered part of the application package and must be submitted with the package. The changes made to the Application Checklist form provide a consistent format for the input of an applicant's personal information and address the two application options (online or print) available for the IHS Scholarship Program.

Form IHS-856-3, "Faculty/Employer Evaluation." This form collects faculty and/or employer evaluation of the applicant. The information is used as part of the applicant rating process. The changes made to the Faculty/Employer Evaluation form provide a consistent format for the input of an applicant's personal information.

Form IHS-856-4, "Narrative Statements". This form requests the applicant to provide a written narrative to three statements. Responses are used as part of the applicant rating process. The changes made to the Narrative Statements form provide a consistent format for the input of an applicant's personal information.

Form IHS-856-5, "Delinquent Federal Debt." This form is used by the applicant to identify and certify any delinquent Federal debt. The changes made to the Delinquent Federal Debt form provide a consistent format for the input of an applicant's personal information, a consistent format for the input of identified delinquent debt and a more comprehensive explanation of what is required when documenting such debt.

Form IHS-856-6, "Course Curriculum Verification." This form identifies and verifies the school, course number(s), course title(s) and number of credit hours in which the

applicant is enrolled. The changes made to the Course Curriculum Verification form provide a consistent format for the input of an applicant's personal information and address the multiple academic terms implemented at various college/universities.

Form IHS-856-7, "Verification of Acceptance or Decline of Award." This form is completed by an applicant after they are notified that they have been awarded a scholarship. Before funds can be obligated and a "Letter of Award" is issued, the successful applicant must complete this required form to accept or decline the offer of an IHS Scholarship. The changes made to the Verification of Acceptance or Decline of Award form provide a consistent format for the input of an applicant's personal information.

Form IHS-815, "Acknowledgement of Receipt of Application." Applicants complete this form with their addresses. This is their receipt that application was received. The changes made to the Acknowledgment Card provide a consistent IHS Scholarship Program address for applicants.

Form IHS-816, "Address Change Notification." Funded applicants complete this form only when there is a change of address. The changes made to the Acknowledgment Card provide a consistent IHS Scholarship Program address for applicants.

Form IHS-817, "Health Professions Preparatory and Pregraduate Education Scholarship Program Agreement - School Year 2009-2010." This is signed by Preparatory (Section 103) and Pregraduate (Section 103P) applicants to indicate agreement to stated terms and conditions as participants. There is no service payback obligation in this agreement. The recommended changes to this form will allow the IHS Scholarship Program to reprint this document in larger quantities, thus reducing the cost of each document, to the government.

Form IHS 818, "Indian Health Scholarship Program Contract, School Year 2009-2010, Health Professions." Health Professions (Section 104) applicants sign this contract thereby agreeing to a period of obligated service equal to one year for each year of funding. Terms and conditions are detailed on this form. The recommended changes to this form will allow the IHS Scholarship Program to reprint this document in larger quantities, thus reducing the cost of each document, to the government.

B. Indian Health Service Scholarship Program Student Handbook

Scholarship recipients each receive a copy of the "IHS Scholarship Program Student Handbook," which contains forms used for monitoring, placement, and to request other program benefits. The handbook instructions have been revised and updated.

Form IHS-856-8, "Recipient's Initial Program Progress Report." This form is used to identify the courses in which a student is enrolled and verify that the student is enrolled in either a full-time or part-time course load for the semester/quarter/trimester. The changes made to the Recipient's Initial Program Progress Report form provide a consistent format for the input of a scholarship recipient's personal information and a more comprehensive report for the IHS Scholarship Program personnel to review.

Form IHS-856-9, "Notification of Academic Problem." This form is completed by students having academic problem(s), who are placed on academic probation, or who fall below the minimum full-time or part-time credit hours. The notice alerts IHS scholarship program staff of students experiencing academic difficulty and provides an opportunity to offer appropriate intervention to assist these students to succeed. The changes made to the Notification of Academic Problem form provide a consistent format for the input of a scholarship recipient's personal information and a more comprehensive report for IHS Scholarship Program personnel to review.

Form IHS-856-10, "Change of Status." The Change of Status form was created to provide scholarship recipients and IHS Scholarship Program personnel an avenue to officially document and have on file any change of status as identified in the Student Handbook that could have an effect on a recipient's scholarship status. This form is due immediately if the recipient is expecting a change in their scholarship program status. Prior communication was made through informal written correspondence only.

Form IHS-856-11, "Request for Approval of Deferment." This form is completed by graduating scholarship recipients requesting deferment of their service obligation to attend postgraduate training. The changes made to the Request for Approval of Deferment form now require scholarship recipients to submit this form prior to the beginning of their final year in school if they are seeking deferment of their service obligation with the IHS Scholarship Program to enroll in a post-graduate clinical training program. This form will indicate the type of program(s) where they will be submitting an application(s). This will allow IHS Scholarship Program personnel the opportunity to review a recipient's identified post-graduate clinical training program(s), identify if that program(s) is permitted under IHS Scholarship Program policies and procedures, provide the recipient with an Approval/Denial letter before December 31, and have the form on file when the recipient notifies the IHS Scholarship Program of their program selection by May 31 of their final year in school using the Form IHS-856-14 "Notification of Deferment Program."

Form IHS-856-12, "Preferred Placement." This form is completed by graduating Health Professions Scholarship Program (Section 104) recipients and is used to identify their preferred payback sites. The IHS Scholarship Branch staff use this information to aide in the placement process of these graduates. The changes made to the Preferred Placement form provide a consistent format for the input of a scholarship recipient's personal information.

Form IHS-856-13, "Notice of Impending Graduation." This form is used by the Health Professions Scholarship Program (Section 104) recipients who will be graduating from their degree program. This form is used to monitor the student's progress towards placement in a position that will fulfill the student's mandatory payback service obligation. The changes made to the Notice of Impending Graduation form provide a consistent format for the input of a scholarship recipient's personal information and remind recipients of their responsibilities for securing job placement within the Indian health system.

Form IHS-856-14, "Notification of Deferment Program." This form is completed by graduating Health Professions Scholarship Program recipients who are required/allowed to perform post-graduate clinical training to become licensed/ specialized in their professions. It serves to notify their IHS Scholarship Program analyst of where they have been accepted and intend to begin their post-graduate clinical training. Along with a Letter of Good Standing provided by their Program Director or Coordinator, this form is submitted by the recipient, annually, until they have completed their post-graduate clinical training. This is a new form for recipient use and is considered separate and serving a different purpose than the Form IHS-856-11 "Request for Approval of Deferment."

Form IHS-856-15, "Placement Update." This form is used to monitor the placement process of graduating Health Professions Scholarship Program (Section 104) recipients to fulfill their mandatory payback service obligation. The changes made to the Placement Update form provide a consistent format for the input of a scholarship recipient's personal information.

Form IHS-856-16, "Annual Status Report." This form is used by the Health Professions Scholarship Program (Section 104) recipients who have graduated from their degree program and are at a service payback site. This form verifies that the recipient is serving at an approved payback site and fulfilling their service obligation. The changes made to the Annual Status Report form provide a consistent format for the input of a scholarship recipient's personal information.

Form IHS-856-17, "Extern Site Preference Request." This form is completed by those students requesting temporary employment within the IHS under the Agency's Scholarship Extern Program and provides an opportunity for the student to request their preferred work site. The changes made to the Extern Site Preference Request form provide a consistent format for the input of a scholarship recipient's personal information

Form IHS-856-18, "Request for Extern Travel Reimbursement." This form is completed by students requesting travel reimbursement for one round trip to the extern site. The changes made to the Request for Extern Travel Reimbursement form provide a consistent format for the input of a scholarship recipient's personal information.

Form IHS-856-19, "Lost Stipend Payment." Scholarship recipients use this form to initiate tracing action on an electric funds transfer (student stipend) that was not received. The changes made to the Lost Stipend Payment form provide a consistent format for the input of a scholarship recipient's personal information.

Form IHS-856-20, "Request for Tutorial Assistance." This form is used by students requesting tutorial assistance. The changes made to the Request for Tutorial Assistance form provide a consistent format for the input of a scholarship recipient's personal information and a more comprehensive report for IHS Scholarship Program personnel to document the course(s), justification(s) and costs of tutorial assistance.

Form IHS-856-21, "Summer School Request." The form is used by students requesting to attend summer school. The form identifies the summer session dates, class courses and the funding being requested. The changes made to the Summer School Request form provide a consistent format for the input of a scholarship recipient's personal information and address the need for recipients enrolled in year-round curriculums to identify their summer school courses for IHS Scholarship Program budgeting purposes.

Form IHS-856-22, "Change of Name or Address." The Change of Name or Address form was created to provide scholarship recipients and IHS Scholarship Program personnel an avenue to officially document and have on file any time a recipient's name (e.g., marriage) or address should change. This form should be submitted immediately to IHS Scholarship Program personnel to update a recipient's personal information in the scholarship program database. Prior communication was made through informal written correspondence only.

Form IHS-856-23, "Request for Credit Validation." The Request for Credit Validation form was created to provide scholarship recipients and IHS Scholarship Program personnel an avenue to officially document and have on file any recipient requests granting the release of pertinent information from their file to credit card companies, banks, etc. Prior communication was made through informal written correspondence only.

Form IHS-856-24, "Faculty/Advisor Evaluation." The Faculty/Advisor Evaluation form was created for current scholarship recipients only. This form is used in the same manner as the Faculty/Employer Evaluation form is used during the new applicant process, however, it is intended only for recipients who are transferring schools, seeking dual enrollment or requesting a change in career category. This form must be submitted with a recipient's continuation application by February 28 or with a Change of Status form should they decide to transfer/seek dual enrollment during the academic year when the application cycle is not open.

3. <u>Use of Improved Information Technology and Burden Reduction</u>:

Automated information technology is utilized, as appropriate, for processing the IHS Scholarship applications. IHS implemented an online application process at the start of the 2008-2009 application cycle, which continues on a cyclical basis for each successive Academic Year. Students will be able to utilize the Internet to apply for a scholarship. Students will complete and submit the IHS-856 and IHS-856-4 forms online. In many instances, written responses are required to answer questions and the other forms will be available online for the student to download and complete.

4. Efforts to Identify Duplication and Use of Similar Information:

No similar information is collected from this population.

5. Impact on Small Businesses or Other Small Entities:

An IHS scholarship applicant may send the Faculty/Employer Evaluation Form (Form IHS-856-3), to a current or former employer who is a small business or other small entity. It is estimated that this form will require less than an hour to complete. The items of information requested are the minimum required to permit IHS staff to make an informed decision concerning the suitability of the IHS scholarship applicant seeking an award.

6. Consequences of Collecting the Information Less Frequently:

A scholarship application for this program must be completed prior to the beginning of each academic school year. If this information collection were to be conducted less frequently, it would not be possible to determine eligibility or to track the scholastic progress of the scholarship recipients.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5:

The collection of information will be consistent with 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice/Outside Consultation Agency:

No Comments were received in response to the July 24, 2009, Federal Register notice (65 FR 76648). (Attachment 4). Two IHS scholarship applicants and recipients (respondents) provided feedback. Neither expressed any difficulty in completing the forms, or understanding the instructions for their completion. In addition, the forms and instructions reflect feedback from the members of the IHS Scholarships Program Standing Committee:

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9. Explanation of Any Payment/Gift to Respondents:

No payment is provided to respondents for providing the requested information. Successful applicants may receive a benefit in the form of an IHS Scholarship.

10. Assurance of Confidentiality Provided to Respondents:

Data gathered on this application form constitute a system of records as defined under the Privacy Act of 1974. The systems notice for the IHS Scholarship Programs is 09-17-0002 IHS Scholarship Programs, HHS/IHS/OHP (Attachment 3). The information collected through use of the IHS Scholarship Program application, as well as handling and storage of this information, will be in compliance with the Privacy Act. A Privacy Act Notice, which describes the authority for collecting the information, the purposes for which the information is collected, routine use disclosures which may be made of the information collected and the necessity of reporting to receive scholarship award consideration, is contained in the "Indian Health Service Scholarship Program Student Handbook," and the "Applicant Information Instruction Booklet for the IHS Scholarship Programs."

11. <u>Justification for Sensitive Questions</u>:

There are no questions on the application form which are considered to be sensitive.

12. <u>Estimates of Annualized Burden Hours (Total Hours and Wages):</u>

12a. Estimate of Total Annual Cost Burden to Respondents (Hours):

Annual Burden Hours

Data collection instrument(s)	Number	Responses	Total	Burden	Annual
	of	per	annual	hour per	burden
	respondents	respondent	response	response	hours
Scholarship Application (IHS-856)	1500	1	1500	1.00 (60min)	1500

Application Checklist (IHS-856-2)	1500	1	1500	0.13 (8min)	200
Faculty/Employer Evaluation (IHS-856-3)	1500	2	3000	0.83 (50min)	2500
Narrative Statements (IHS-856-4)	1500	1	1500	0.75 (45min)	1125
Delinquent Federal Debt (IHS-856-5)	1500	1	1500	0.13 (8min)	200
Course Curriculum Verification (IHS-856-6)	1500	1	1500	0.70 (42min)	1050
Verification of Acceptance (IHS-856-7)	400	1	400	0.13 (8min)	53
Recipient's Initial Program Progress Report (IHS-856-8)	400	1	400	0.13 (8 MIN)	53
Notification of Academic Problem (IHS-856-9)	50	1	50	0.13 (8 min)	7
Change of Status (IHS- 856-10)	50	1	50	0.45 (25min)	21
Request for Approval of Deferment (IHS-856-11)	50	1	50	0.13 (8 min)	7
Preferred Placement (IHS-856-12) Notice of Impending Graduation	200	1	200	0.75 (45 min)	150
(IHS-856-13)	200	1	200	0.17 (10 min)	33
Notification of Deferment Program (IHS-856-14)	50	1	50	0.13 (8 min)	7
Placement Update (IHS-856-15)	200	1	200	0.18 (11 min)	37
Annual Status Report (IHS-856-16)	200	1	200	0.25 (15 min)	50
Extern Site Preference Request (IHS-856-17)	125	1	125	0.13 (8 min)	17
Request for Extern Travel Reimbursement (IHS-856-18)	125	1	125	0.10 (6 min)	13
Lost Stipend Payment (IHS-856-19)	50	1	50	0.13 (8 min)	7
Request for Tutorial Assistance (IHS-856-20)	150	1	150	0.13 (8 min)	20
Summer School Request (IHS-856-21)	75	1	75	0.10 (6 min)	8
Change of Name or Address (IHS-856-22)	50	1	50	0.13 (8 min)	7
Request for Credit Validation					
(IHS-856-23)	30	1	30	0.10 (6 min)	3
Faculty/Advisor Evaluation (IHS-856-24)	1500	2	3000	0.83 (50 min)	2500
Acknowledgement Card (IHS-815)	1500	1	1500	0.03 (2min)	50
Address Change Notice (IHS- 816)	50	1	50	0.02 (1 min)	1
Scholarship Program Agreement (IHS-817)	175	1	175	0.05 (3min)	9
Health Professions Contract	225	1	225	0.05 (3 min)	11

(IHS-818)			
Total	 		 9,63
		17,855	9

^{*}For ease of understanding, burden hours per student response are also provided in minutes.

12b. Estimate of Total Annual Cost Burden to Respondents (Wages):

There is no direct cost to respondents other than their time to voluntarily complete the forms and submit them for consideration. The estimated cost in time to respondents, as a group, is $$99,378.09 (9,639 burden hours \times 2009 GS-3 base pay rate = $10.31 per burden hour)$.

Annual Burden Hours

Data collection instrument(s)	Number of respondents	Responses per respondent	Total annual response	Burden hour per response	Annual burden hours
Scholarship Application (IHS-856)	1500	1	1500	0.16 (10min)	250
Application Checklist (IHS-856-2)	1500	1	1500	0.016 (1min)	25
Faculty/Employer Evaluation (IHS-856-3)	1500	2	3000	0.05 (3min)	150
Narrative Statements (IHS-856-4)	1500	1	1500	0.25 (15min)	375
Delinquent Federal Debt (IHS-856-5)	1500	1	1500	0.05 (3min)	75
Course Curriculum Verification (IHS-856-6)	1500	1	1500	0.16 (10min)	250
Verification of Acceptance (IHS-856-7)	400	1	400	0.05 (3min)	20
Recipient's Initial Program Progress Report (IHS-856-8)	400	1	400	0.05 (3min)	20
Notification of Academic Problem (IHS-856-9)	50	1	50	0.083 (5min)	4
Change of Status (IHS- 856-10)	50	1	50	0.16 (10min)	8
Request for Approval of Deferment (IHS-856-11)	50	1	50	0.083 (5min)	4
Preferred Placement (IHS-856-12)	200	1	200	0.083 (5min)	17
Notice of Impending Graduation (IHS-856-13)	200	1	200	0.05 (3min)	10

	I	I		I	1
Notification of Deferment Program			50		
(IHS-856-14)	50	1		0.083 (5min)	4
Placement Update (IHS-856-15)	200	1	200	0.083 (5min)	17
Annual Status Report (IHS-856-16)	200	1	200	0.083 (5min)	17
Extern Site Preference Request					
(IHS-856-17)	125	1	125	0.05 (3min)	6
Request for Extern Travel					
Reimbursement (IHS-856-18)	125	1	125	0.05 (3min)	6
Lost Stipend Payment (IHS-856-19)			50		
	50	1		0.16 (10min)	8
Request for Tutorial Assistance					
(IHS-856-20)	150	1	150	0.16 (10min)	25
Summer School Request					4.5
(IHS-856-21)	75	1	75	0.16 (10min)	13
Change of Name or Address		1	F0	0.05 (2:)	
(IHS-856-22)	50	1	50	0.05 (3min)	3
Request for Credit Validation					
(IHS-856-23)	30	1	30	0.16 (10min)	5
Faculty/Advisor Evaluation				, ,	
(IHS-856-24)	1500	2	3000	0.083 (5min)	250
Acknowledgement Card (IHS-815)	1500	1	1500	0.05 (3min)	75
Address Change Notice (IHS- 816)	50	1	50	0.05 (3min)	3
Scholarship Program Agreement					
(IHS-817)	175	1	175	0.05 (3min)	9
Health Professions Contract					
(IHS-818)	225	1	225	0.05 (3 min)	11
Total					166
			17,855		0
, ,					16

^{*}For ease of understanding, burden hours for staff processing are also provided in minutes.

13. Estimate of Other Total Annual Burden to Respondents or Recordkeepers/Capitol Costs:

There are no other costs to the respondents associated with this information collection.

14. Total Cost to the Federal Government:

The estimated annual cost to the Federal Government is \$33,106. It is based upon \$16,439 for Application Handbook, Student Handbook and associated forms printing and \$1,667 for the Application forms printing and \$15,000 for the mailing of both

Application Handbook and Student Handbook packets each year.

15. Explanation for Program Changes or Adjustments:

The program change, increase in the burden hours by 3100 hours, is due to the revisions made in the current data collection instruments and the addition of five new data collection instruments for individuals applying as either New or Continuation scholars, to the IHS Scholarship Program.

16. Plans for Tabulations and Publication and Project Time Schedule:

There are no plans for the tabulation, statistical analysis and publication of information collected.

17. Reason(s) Display of OMB Expiration Date is Appropriate:

OMB information will be displayed on information collection forms accordingly.

18. Exceptions to Certification for Paperwork Reduction Act Submissions:

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection activity will not employ sampling to select respondents (IHS Scholarship Program applicants).

ATTACHMENTS

IHS SCHOLARSHIP PROGRAM APPLICATION

Attachment 1

- A: Public Law 94-437, "The Indian Health Care Improvement Act" as amended.
- A. 42 CFR Sections 36.320, 36.330 and 36.370.

Attachment 2:

- A. Application for Participation in: The Indian Health Service Scholarship Programs. Form IHS-856 with copy of previous form highlighting revised section(s).
- B. Applicant Information Instruction Booklet for the IHS Scholarship Programs. Forms IHS-856-2 to 7, IHS-815 and IHS-816.
- C. Indian Health Scholarship Program Contract *and Agreement*Form IHS-817 and IHS 818.
- D. Indian Health Service Scholarship Program Student Handbook.Forms IHS-856-8 to 24.

Attachment 3

Privacy Act systems notice, "09-17-0002 IHS Scholarship Programs, HHS/IHS/OHP."

Attachment 4

Request for Public Comment in Federal Register Notice - 60 day.

Agency Response to Public Comment: No comments received.

Attachment 5

Draft - Request for Public Comment in Federal Register Notice - 30 day.

Attachment 1

- A. Public Law 94-437, "The Indian Health Care Improvement Act" as amended.
- B. 42 CFR Sections 36.320, 36.330 and 36.370.

Attachment 2:

- A. Application for Participation in the Indian Health Service Scholarship Programs. Form IHS-856 with copy of previous form highlighting revised section(s).
- B. Applicant Information Instruction Booklet for the IHS Scholarship Programs.Forms IHS-856-2 to 7, IHS-815 and IHS-816.
- C. Indian Health Scholarship Program Contract *and Agreement*Form IHS-817
 Form IHS-818
- D. Indian Health Service Scholarship Program Student Handbook.Forms IHS-856-9 to 24

Attachment 3

Privacy Act systems notice, "09-17-0002 IHS Scholarship Programs, HHS/IHS/OHP."

Attachment 4

Request for Public Comment in Federal Register Notice - 60 day.

Agency Response to Public Comment: No comments received.

Attachment 5

Request for Public Comment in Federal Register Notice - 30 day.