

**Supporting Statement for the
Indian Health Service Loan Repayment Program
Information Collection 0917-0014,
Authorized Under 25 U.S.C. § 1616a,
P.L. 94-437 § 108**

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 through which the IHS agrees to repay part or all of their indebtedness in exchange for an initial two-year service commitment to practice fulltime at an eligible Indian health program.

A. Justification

1. Need and Legal Basis

This program is necessary to augment the critically low health professional staff at eligible Indian health care facilities. Any health professional wishing to have their health education loans repaid, may apply to the IHS LRP. A two-year contract obligation is signed by both

parties, and the individual agrees to work at an eligible location and provide health services to American Indian and Alaska Native individuals. The proposed information collection is a request for an extension of the currently approved information collection, 0917-0014, "Indian Health Service Loan Repayment Program." The application is available online and is electronically fillable and fileable; applicants can complete and submit the application on line. The application can be found on the IHS.gov website, at:

<http://www.ihs.gov/loanrepayment/index.cfm>

This information is authorized to be collected by the Indian Health Care Improvement Act, Public Law (Pub. L.) 94-437, § 1616a, as amended (See http://www.ihs.gov/ihcia/documents/home/USCode_Title25_Chapter%2018.pdf).

1. Information Users

The previously approved LRP application is available in an on-line format. This information collection provides the applicant with the capacity to complete and submit the application to the LRP using electronic information technology. The technology also provides the IHS with the capability to store the information in a database.

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 accepts employment at a location, they in turn “pick-up” the score of that location.

The awardees then sign 2-year contracts obligating them to work at their locations, and in return the Agency pays their eligible student loans.

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

2. **Improved Information Technology:**

The IHS LRP Application is available to complete and submit in an electronic on-line format.

3. **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. Applicants who live in remote areas or do not have access to the internet may still submit the application via mail or other method.

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

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

8. Federal Register Notice/Outside Consultation

The Agency's 60-day notice soliciting public comments on the information collection was published in the *Federal Register* (80 Fed. Reg. 23558) on April 28, 2015, as required by the Paperwork Reduction Act of 1995 [44 U.S.C. § 3506(c)(2)(A)]. No public comments were received. A 30-day Federal Register Notice (80 Fed. Reg. 33275) was published in the *Federal Register* on June 11, 2015, in compliance with the PRA [44 U.S.C. § 3507(a)(1)(D)].

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 2015. The following are the names, titles, phone numbers, and e-mail addresses of those consulted.

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In addition, the following IHS LRP 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 is maintained in accordance

with the Health and Human Services Privacy Act Records System Notice 09-17-0002, “Indian Health Service Scholarship and Loan Repayment Program.” 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	816	1	1.5 hours	1224
Total	816	1	1.5	1224

Annual Information Collection Costs to Respondents:

There is no costs to respondents, other than 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	1224	\$32	\$39,168
Total	1224	\$32	\$39,168

This information collection will not require the purchase of any capital equipment or start-up costs; and 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. This process is now available in an electronic on-line format. This information collection is part of the respondents' customary and usual business practices, and therefore is 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 and the staff time to perform the initial screening of each application and a thorough review and analysis of each of the remaining applications. Cost estimate is also based on information technology (IT) consultant's fees and services. The estimated annual cost to the Federal government is as follows:

<u>ITEM</u>	<u>COST</u>
Estimated annual maintenance cost:	\$19,166

Staff time – Initial screening and thorough review:

Average Staff Salary = \$45.90 per hour x 1.5 hours x 816 \$56,182

Annual Burden Hours

Estimated Annual Costs \$75,348

15. Program or Burden Changes

This is a request for an extension. There was an adjustment or increase in annual burden hours from the previously approved annual burden hours of 765 to 1224. The increase in annual burden hours of 459 hours is due to an increase in the number of respondents or applicants from 510 to 816 individuals. There was also a small increase in cost to the Federal Government of \$98, which reflects an increase in costs related to processing more applications. There were no program changes.

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.

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