



TO: Office of Management and Budget

FROM: Director  
Office of Information Technology

SUBJECT: Justification Memo for Tribal EHR Data Call Information Collection

### ISSUE

The purpose of this memorandum is provide a justification and request approval of the Indian Health Service (IHS) information collection titled, "Tribal EHR Data Call."

### JUSTIFICATION

This information collection is a requirement from Congress. Congress instructed IHS to report on the number of Tribes using commercial EHR solutions, and their associated costs. Congress did not specify its intent or purpose for asking for this information.

According to the Consolidated Appropriations Act, 2021, signed into law on December 27, 2020, "The Committees direct the [Indian Health] Service to report back within 120 days of enactment of this Act with a list of Tribes that currently maintain their own non-RPMS electronic health record systems along with cost estimates required for those Tribes to implement, maintain, and make any necessary upgrades to these systems. Further directions and limitations on expenditures are provided in the bill."

This information requested is after the 120 day of enactment. This collection is essential. Normally, the IHS does not collect or maintain this information about Tribal investment into non-RPMS EHR systems, and IHS must issue a data call to the Tribes to gather the information.

The Agency cannot reasonably comply with the normal clearance procedures under this Part because the use of normal clearance procedures is reasonably likely to cause a statutory deadline to be missed.

### RECOMMENDATION

I recommend you approve this request so that we can begin to collection the information.

Mitchell Thornbrugh