

**Supporting Statement for the
Urban Indian Organization On-Site Review
Information Collection 0917-XXXX**

Background

The Indian Health Service (IHS) Urban Indian Organization On-Site Review is conducted annually by the IHS Area Offices to evaluate IHS-funded Urban Indian Organizations' (UIOs) compliance with the Federal Acquisition Regulations (FAR), the Indian Health Care Improvement Act (IHCIA), and other contract and grant requirements. The on-site review requirements are based on best-practice standards for delivering safe and high quality health care. The Office of Urban Indian Health Programs (OUIHP) at IHS Headquarters provides national oversight of the annual on-site reviews.

A. Justification

1. Need and Legal Basis

Under the Department of Health and Human services IHS is requesting an approval on a new collection.

The IHS Area Offices conduct annual on-site reviews in collaboration with UIOs.

Area Offices identify members of the on-site review team and share the team's credentials with UIOs. Review teams examine documentation as evidence UIOs have met on-site review requirements such as policies, community health assessments, governing board bylaws, strategic plans, clinical privileging, performance measures, financial audits, employee handbook, and health records. At the end of on-site reviews, some reviews may require follow-up by the review team to ensure corrective action plans are successfully completed prior to continuation of funding.

The purpose of on-site reviews is to strengthen UIOs' health delivery systems and quality of care. On-site reviews evaluate health services to ensure laws, regulations, and standards are being met. It provides an opportunity for UIOs to update policies and procedures, and training materials to ensure they are consistent with current practices. It also examines credentialing and privileging, roles and responsibilities, and training needs of health care providers and other pertinent staff. The goal of on-site reviews is to improve quality of care to ensure patients receive consistent, excellent care throughout the organizational structure; increase community confidence that builds patient trust and partnerships within Urban Indian communities; improve operational efficiency and processes to manage complex issues and make strategic shifts if needed; and increase external insights on how to improve health services for Urban Indians.

All IHS-funded UIOs are required to participate in annual on-site reviews. UIOs vary

in size and services – full ambulatory care, limited ambulatory care, outreach and referral, and residential and outpatient substance abuse treatment programs. UIOs are described as follows:

Full Ambulatory Care: programs providing direct medical care to the population served for 40 or more hours per week; Limited Ambulatory Care: programs providing direct medical care to the population served for less than 40 hours per week;

Outreach and Referral: programs providing case management of behavioral health counseling and education services, health promotion/disease prevention education, and immunization counseling but not direct medical care services; and Residential and Outpatient Substance Abuse Treatment: programs providing residential and outpatient substance abuse treatment, recovery, and prevention services.

All IHS-funded UIOs must meet annual on-site review core requirements. The core requirements are as follows: Legislative Requirements; Governance Requirements; Administrative Requirements; Financial Management Requirements; Human Resources Requirements; Environmental Safety Requirements, and Outreach and Community Services Requirements. In addition, UIOs may request a review of additional requirements from Area Offices. These reviews will be done as consultations rather than structured annual on-site reviews. Consultations may assist UIOs in preparing for licensure, accreditation, or other certifications.

Legal Basis and Authorities:

The IHCIA, at 25 U.S.C. § 1655, states that the Indian Health Service (IHS or the Service) will annually review and evaluate each UIO funded under the law. The IHCIA also requires the IHS to develop procedures for evaluating compliance with awards made under the statute. Section 1655 states, in part:

(a) Contract compliance and performance: the Secretary, through the Service, shall develop procedures to evaluate compliance with grant requirements under this subchapter and compliance with, and performance of contracts entered into by [UIOs] under this subchapter. Such procedures shall include provisions for carrying out the requirements of this section.

(b) Annual onsite evaluation: the Secretary, through the Service, shall conduct an annual on-site evaluation of each [UIO] which has entered into a contract or received a grant under Section 1653 of this title for purposes of determining the compliance of such organization with, and evaluating the performance of such organization under, such contract or the terms of such grant.

This information is authorized to be collected by:

The authorizing legislation of Urban Indian Health is 25 U.S.C. 13, Snyder Act; 42 U.S.C. 2001, Transfer Act; 25 U.S.C. 1651-1660h, the IHCIA. The Fiscal Year 2021 Urban Indian Health Budget was \$62.684 million.

1. Information Users

To meet statutory compliance, the Urban Indian Organization On-Site Review will be

conducted annually by IHS Area Offices. The IHS Area Offices will identify members of the on-site review team to review documentation as evidence UIOs have met FAR requirements, and other contract or grant requirements. Review teams may request additional information to further demonstrate contract and/or grant compliance. In addition, UIOs may use the annual on-site reviews to complete corrective action plans in areas that were found to be deficient during the review.

2. **Improved Information Technology:**

Not applicable for this collection.

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 the on-site review. The information requested is specific to IHS-funded UIOs and unique to the statutory requirements under the IHCIA.

5. **Small Businesses**

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

6. Less Frequent Collection

This information will be collected by the IHS annually based on statute.

7. Special Circumstances

This information collection will be consistent with guidelines in the IH CIA, at 25 U.S.C. § 1655.

8. Federal Register Notice/Outside Consultation

A 60-day Federal Register (FR) Notice was published in the FR on February 11, 2022, 87 FR 8020, and a 30-day FR notice, published in the FR on September 9, 2022, 87 FR 55448 (see attachment in system). There was one public comment regarding recommendations from a Tribal Urban organization (comment attached in system).

OUTSIDE CONSULTATION: No outside consultation or confer was held.

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 IHS will abide by all federal confidentiality and privacy laws regarding protected health information. Data will be kept private to the extent allowed by law.

11. Sensitive Questions

There are no questions of a sensitive nature solicited in this information collection and it is not intended for specific individuals.

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 Hours
On-site Review	41	1	16 hours	656 hours
	41	1	16 hours	656 hours

Total				
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12B. Annual Information Collection Costs to Respondents:

The estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories are below. The appropriate wage rates for respondents was determined by reviewing scopes of work and budgets from contracts and grants. Estimated Annualized Respondent Burden Costs: $\$3307.68 \times 41 \text{ UIOs} = \$135,615$

Estimated Annualized Respondent Burden Costs

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Onsite Review	16	206.73	3307.68
Total			\$3307.68

13. Capital Costs (Maintenance of Capital Costs)

The cost estimate is zero. Estimate of annualized costs to respondents for the hour burdens for collections of information is estimated to be zero.

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. 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.

This information collection is asking for existing information and therefore is not included in the estimate.

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.

Estimated government costs for contracted data collection by adding the contract costs plus the personnel costs of federal employees involved in oversight and/or analysis. The estimated annual cost to the Federal government is as follows:

<u>ITEM</u>	<u>COST</u>
Fiscal Year 2021 Onsite Review Web Application:	
Operations and Maintenance (contractor support)	\$40,000
Employee Cost (GS-13 Step 5)	\$54,332

Estimated Annual Costs

\$94,332

15. Program or Burden Changes

There were no program changes; not applicable.

16. Publication and Tabulation Dates

This request is for a recurring data collection, and is requested for 3-year clearance.

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.