

Health Resources and Services Administration

Supporting Statement A

Scholarships for Disadvantaged Students Program

OMB Control No. 0906-0073 – Revision

Terms of Clearance: None

A. Justification

1. Circumstances Making the Collection of Information Necessary

HRSA seeks to collect data on the Scholarships for Disadvantaged Students (SDS) Program Specific Form, which will assist the agency in making funding decisions for SDS program awards. The SDS Program Specific Form and the Bureau of Health Workforce (BHW) Program Specific Data Form are currently approved under OMB No.0906-0073 with an expiration date of November 30, 2025. Renewing this collection will ensure that this ICR does not expire in the event that data collection is required or a new application cycle occurs before 2030. This clearance is for the renewed approval of one form, the SDS Program Specific Form, and removal of the BHW Program Specific Data Form. The name for the current information collection request has changed to the “*Scholarships for Disadvantaged Students Program Specific Form*” to align with these updates.

The SDS program is authorized by section 737 of the Public Health Service (PHS) Act (42 USC 293a). The purpose of the SDS program is to promote diversity among health professions students and practitioners by providing funds to eligible schools for use in awarding scholarships to full-time financially needy students from disadvantaged backgrounds enrolled in health professions and nursing programs.

Schools that are eligible for the SDS program are schools of medicine, dentistry, osteopathic medicine, pharmacy, optometry, physical therapy, podiatric medicine, and veterinary medicine, schools of nursing, public health, allied health, chiropractic, and graduate programs in clinical psychology, clinical social work, professional counseling, marriage and family therapy, and physician assistant training.

To qualify for participation in the SDS program, a school must carry out a program for recruiting and retaining students from disadvantaged backgrounds, including students who are members of racial and ethnic minority groups (section 737(d)(1)(B) of the PHS

Act). In order to meet this statutory requirement, a school must demonstrate that its program has achieved success based on the number and/or percentage of disadvantaged students who are enrolled in and graduate from the school. In awarding SDS funds to eligible schools, priority points must be given to schools based on the proportion of graduate students practicing in primary care, the proportion of full-time underrepresented minority students, and the proportion of graduates working in medically underserved communities (section 737(c) of the PHS Act).

Below is a discussion of each application form and accompanying instructions, as well as the documentation required by the SDS Program.

2. Purpose and Use of Information Collection

HRSA uses the data to determine eligibility and priority points for each SDS grantee.

SDS Application

The information collected for the SDS application is needed by HRSA to determine whether applicant schools are eligible to participate in the program and to establish priority points for funding. Applicant schools are required to complete an application for each discipline or program for which funding is requested (for instance, they would need to submit two separate applications if they are requesting funding for their pharmacy and optometry programs). Each school determines the eligibility of individual students based on financial need and whether a student meets the criteria for being from a disadvantaged background.

An SDS application is prepared and submitted electronically through Grants.gov. The SDS Notice of Funding Opportunity (NOFO) is available through Grants.gov, including the Program Specific Forms and Instructions. Applicants use the SF 424 R & R as the Application forms package. All applicants must register in Grants.gov to submit the application electronically.

SDS Program Specific Form

Each grantee must demonstrate that at least 20 percent of the students enrolled and graduated are from disadvantaged backgrounds using data from the past three academic years. Disadvantaged background can be demonstrated by students' educational, environmental, or economical background. Educational and environmentally disadvantaged means an individual comes from an environment that traditionally inhibits people from obtaining the knowledge, skills, and abilities required to enroll in and graduate from a health professions school, or from a program providing education or training in an allied health profession. Economically disadvantaged means an individual comes from a family with an annual income below a specific income threshold based on family size, as established by the U.S. Census Bureau.¹ As

¹ How the Census Bureau Measures Poverty. Revised April 2025.
<https://www.census.gov/topics/income-poverty/poverty/guidance/poverty-measures.html>

required by Section 673(2) of the Community Services Block Grant (42 U.S.C. 9902(2), the Secretary of the U.S. Department of Health and Human Services (HHS) updates the income threshold annually on the basis of the Consumer Price Index for All Urban Consumers (known as CPI-U), to be used in all health professions programs.

Applicants use this form to provide data on full-time student enrollment and the race/ethnicity of those students, disadvantaged full-time enrollment by class year, full-time students graduated, full-time disadvantaged students graduated, and full-time graduates serving in medically underserved communities. Numbers of full-time graduates serving in primary care must be provided only for schools of medicine, osteopathic medicine, dentistry, nursing (graduate degree program), physician assistants, dental hygiene, and mental and behavioral health.

Additionally, SDS uses this data to award priority points to schools based on the proportion of graduate students practicing in primary care, the proportion of full-time underrepresented minority students (URMs), and the proportion of graduates working in medically underserved communities (section 737(c) of the PHS Act). Those schools with the largest proportion of graduates working in primary care, highest URM full-time students' enrollment, and graduates working in medically underserved communities receive the most points.

Consequently, the form collects data on the full-time student enrollment and graduate data for the past three academic years, including information on students' ethnic and racial identification, and the proportion of graduates working in primary care and medically underserved areas or populations.

Additionally, this form collects information on accreditation, length of program, requested award amount, and recruitment and retention efforts. SDS collects the data on the program specific form to analyze institutional factors at high performing grantees for replication and encouragement in future NOFOs.

Without this information, it would not be possible to determine if an applicant is eligible for the award, since to qualify schools must be able to administer a program to recruit and retain students from disadvantaged backgrounds.

3. Use of Improved Information Technology and Burden Reduction

The entire application, including the SDS Program Specific form, is completed in Grants.gov and the Electronic Handbooks (EHBs), HRSA's grants management system. HRSA's EHBs are 508-complaint.

4. Efforts to Identify Duplication and Use of Similar Information

Information requested in the application is specific to the applicant and is unique to

this program. Specifically, the information in the program specific form is used to determine eligibility and priority points. It is not allowable to determine these factors from other sources as the information needs to come directly from the applicant to ensure accuracy and validity.

5. Impact on Small Businesses or Other Small Entities

No small businesses will be involved in this data collection.

6. Consequences of Collecting the Information Less Frequently

The information requested in the application is collected once during each application cycle. In the absence of collection of these data, the review, selection, and approval of qualified applicants could not be carried out.

The legal obstacle to reduce the burden of not collecting this information is that we need this information to determine if the applicant is eligible for the award, as specified by section 737(d)(1)(B) of the PHS Act.

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

The information collected is consistent with the Guidelines in 5 CFR 1320.5(d)(2).

HRSA updated the SDS Program Specific form to include the necessary changes (i.e., to include the “Middle Eastern or North African” category) to comply with SPD-15 in time for the next application cycle. The updated SDS Program Specific Form will include a “Race and Ethnicity Question with Minimum Categories Only.”

HRSA will be using the minimum categories to align with other data collection tools used across BHW programs. Collecting detailed race/ethnicity data would result in sample sizes that would decrease precision and make it harder to identify differences between groups to the degree that it would call data quality into questions. These changes will be implemented in late 2028 ahead of the 2030 application cycle as the program is not currently using this form.

Data on sex is no longer collected through this information collection, as the BHW Program Specific Form is discontinued and will no longer be used in any information collection request. The only form that will be included in this ICR is the SDS Program Specific Form.

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

Section 8A:

A 60-day Federal Register Notice was published on May 28, 2025, volume 90, No.

101, page 22494. There were no comments.

A 30-day Federal Register Notice was published on August 15, 2025, volume 90, No. 156, page 39399-39400. HRSA received one public comment regarding the inclusion of the Middle Eastern or North African Category.

Summary of the public comment:

The National Network for Arab American Communities (NNAAC) urges HRSA to revise the Scholarships for Disadvantaged Students (SDS) Program Specific Form to align with the 2024 revisions to Statistical Policy Directive No. 15 (SPD-15) by including a combined race/ethnicity question with a distinct “Middle Eastern or North African” (MENA) category. NNAAC emphasizes that the current form inaccurately categorizes MENA students as “White,” obscuring their socioeconomic and health disparities and excluding schools serving them from eligibility for SDS funding. Recognizing MENA students would reduce respondent burden, improve accuracy in federal data, and ensure that disadvantaged MENA populations—often facing linguistic, cultural, and health-related barriers—have equitable access to support and opportunities in the health workforce.

Agency Response sent through HRSA’s PRA office:

We thank NNAAC for their comment on the SDS Program Specific Form. HRSA will incorporate a distinct “Middle Eastern or North African (MENA)” category in the SDS Program Specific Form beginning with the next application cycle. This revision is consistent with the March 2024 update to Statistical Policy Directive No. 15 (SPD-15),² which requires agencies to make data collection practices consistent with the revised standards no later than March 28, 2029.

As NNAAC notes, and HRSA concurs, the inclusion of a MENA category may require SDS applicants to update their data collection tools to ensure accurate reporting. Since this is considered a substantive change, it could not be implemented in the FY 2025 application cycle. Accordingly, HRSA is submitting this modification as part of our information collection revision request to the Office of Information and Regulatory Affairs. This update will improve data accuracy, ensure compliance with federal standards, and promote equitable representation of MENA students.

Section 8B:

The SDS program staff conducted burden testing performed by eight grantees regarding the format, content of data to be collected, and time to complete the application and report. The SDS Program Specific Form was reduced from sixteen sections to seven sections. The program staff calculated the time for completion of

² [Revisions to OMB’s Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity. \(2024-06569 \(89 FR 22182\)\).](#)

the revised form at 14 hours based upon program experience and past grant recipient comments.

9. Explanation of any Payment/Gift to Respondents

Respondents will not receive any payments or gifts.

10. Assurance of Confidentiality Provided to Respondents

The HRSA Privacy Act Coordinator has determined that a system of records notice is not required because the participating institutions maintain the student records associated with these programs and the data submitted through the SDS Program Specific Form is aggregate data. Identifiable information about Program Points of Contact is submitted through the Grants.gov and EHBs systems, but this does not fall under the Privacy Act requirements as information is not regularly retrieved by a personal identifier. Data will be kept private to the extent allowed by law.

Applicants and users of the EHBs, must acknowledge a pop-up warning box informing them that it is a government system, and that the Government may monitor, record, and audit their system usage. In addition, any communication or data transiting or stored on the EHBs may be disclosed or used for any lawful Government purpose.

11. Justification for Sensitive Questions

We collect data on the race/ethnicity of enrolled students to determine whether the applicant is eligible to receive SDS funds by demonstrating at least 20 percent of the applicant's enrollees and graduates are from disadvantaged backgrounds. Additionally, the same data is used to determine if an applicant qualifies for the statutory funding-priority points under section 737(c) of the PHS Act based on three priority areas:

1. The proportion of graduating students going into primary care;
2. The proportion of underrepresented minority students; and
3. The proportion of graduates working in medically underserved communities.

To be eligible for this priority, applicants must have a certain percentage for each of three priority areas. Applicants receive two priority points for each priority area they demonstrate 15-29.99 percent compliance, three points for 30-49.99 percent compliance and four points for 50 percent or more.

Estimates of Annualized Hour and Cost Burden

The estimated burden hours are reflected in the following table:

12A. Estimated Annualized Burden Hours

Form Name	Number of Respondents	Number of Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
SDS Program Specific Form	500	1	500	14	7,000
Total	500	--	500	--	7,000

Basis for estimates:

Application: The burden table captures the burden for the applicant (i.e., the schools/institutions) to complete the application to receive SDS funding. Students do not complete the form to be approved under this ICR request; thus, students are not included in the burden table. Applicants are not expected to submit additional paperwork during the application period beyond the form to be approved under this ICR request.

The next anticipated SDS competition cycle will be in FY 2030. The number of SDS applicants is estimated to be approximately 500, which is based on the increased number of completed applications for the FY 2025 cycle. The overall burden declined due to the elimination of the BHW Program Specific form from this collection, which was used across BHW programs whereas the SDS Program Specific Form is specific to the SDS program.

Each applicant must complete one application. The application consists of general information, instructions, and a data form. Some information should be readily available, and some tracking of graduates will be necessary to provide the information necessary to satisfy the eligibility requirements and request priority points. Based on conversations with schools that are familiar with the program, they estimate that it will take approximately 14 hours to review the instructions, collect data, and complete the form (500 applicants X 14 hours/response = 7,000 hours of response burden).

12B. Estimated Annualized Burden Costs

Type of Respondent	Total Burden Hours	Hourly Wage Rate (x2) ³	Total Respondent Costs
Eligible Applicants	7000	\$99.96	\$699,720
Total			\$699,720

We estimate that the costs to the public will be \$699,720 (14 hours X \$99.96/hour = \$ 1,399.44 x 500 applicants). An average wage rate for an employee to process the form for the SDS program application is \$ 99.96 per hour, including overhead costs.

We estimate that the total cost to the public for the application will be **\$699,720**.

13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

Other than their time, there is no cost to respondents.

14. Annualized Cost to Federal Government

Federal Employee Costs:

Instrument	GS-Level/Base Pay Rate	Project Time per FTE	Number of FTEs	Total Annual Cost (x 1.5)
SDS Program Specific Form	\$114,923 (GS-12, Step 5)	0.2	1	\$34,477

The staff cost for application format, updates to program guidance, application acceptance, reviews and analysis of an estimated 500 applicants per application cycle (5 years) is expected to be \$34,477 for the year. This includes one GS-14 develops the application format, updates the program guidance, reviews, analyzes and approves the applications.

Contractor Costs:

The SDS application information is transferred from Grants.gov into the HRSA EHBs. The EHBs contractors, REI Systems, Inc., provided application development which was \$162,084 for one year. In addition, the contractors, REI Systems, Inc., provide maintenance on the EHBs system for \$10,000 a year.

The total annualized cost to the Federal Government is **\$206,561** (includes staff and REI contract) for the SDS Application.

15. Explanation for Program Changes or Adjustments

³ Hourly Wage Rate based on the United States Department of Labor, Bureau of Labor Statistics for a Postsecondary Education Administrator, <https://www.bls.gov/ooh/management/postsecondary-education-administrators.htm>. Hourly wage doubled to account for benefits.

BHW no longer seeks to collect information related to the BHW Program Specific Form. It has been removed completely from this information collection request, thereby significantly decreasing programmatic burden. Its removal accounts for a reduction in 28,966 total burden hours when compared to the previous information collection request. This form is no longer needed by HRSA.

The SDS Program Specific form was updated to include fewer questions and sections, resulting in lowering the burden on applicants while ensuring the program had the required information it needed to determine the applicant's eligibility and priority points. Specifically for the FY 2025 NOFO, the SDS Program Specific form did not collect the following information because it was collected elsewhere in the application:

- Accreditation information,
- Requested award amount,
- Number of students supported,
- Certification and eligibility information,
- Community College information, and
- Recruitment and retention information.

16. Plans for Tabulation, Publication, and Project Time Schedule

Tabulation and analysis is currently performed on the information collected to improve program management, evaluate the program outcomes, and report to the Congress and the Department, as needed. We are requesting a three (3) year clearance for the SDS application.

Application: The project period is five (5) years. The first year of the project period is July 1, 2030 – June 30, 2031. The second year of the project period will be July 1, 2031 – June 30, 2032. All subsequent years will run from July 1 of one year to June 30 of the next year. Funding beyond the first year is dependent on the availability of appropriated funds for the SDS program in subsequent fiscal years, grantee satisfactory performance, and a decision that continued funding is in the best interest of the Federal Government. The next application cycle is anticipated to be in FY 2030.

Data is provided on full-time student enrollment and race/ethnicity of full-time students, disadvantaged full-time enrollment by class year, full-time students graduated, full-time students from disadvantaged backgrounds graduated, and full-time graduates serving in medically underserved communities. Numbers of full-time graduates serving in primary care must be provided only for schools of medicine, osteopathic medicine, dentistry, nursing (graduate degree program), physician assistants, dental hygiene, and mental and behavioral health.

Aggregated SDS data from submitted annual performance reviews will be published on the [Bureau of Health Workforce Program Evaluation and Outcomes](#) and the

[Health Professions Training Program](#) webpages. The report on the Program Evaluation and Outcomes page is available in a 508 compliant PDF for viewing and download. The data on the Health Professions Training Program webpage is updated and made available yearly. In addition to the interactive webpage, the data is available to download in Excel, PDF, PowerPoint and as an image. In accordance to [42 U.S.C. § 295k\(e\)\(3\)](#) governing health professions data, non-aggregated/disaggregated data are not regularly shared with the public.

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

The expiration date will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

This fully complies with the guidelines set forth in 5 CFR 1320.9. The certifications are included in the package.