

**Supporting Statement for IHS Scholarship Program Application
(OMB No. 0917-0006)**

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary:

The Indian Health Service (IHS) is requesting a revision of the currently approved information collection, titled "IHS Scholarship Program Application" (OMB No. 0917-0006).

The IHS Scholarship Program offers qualified American Indian and Alaska Native (AI/AN) health profession students a unique opportunity to establish an educational foundation as they prepare to pursue a career in Indian health. Each scholarship (Preparatory, Pre-Graduate and Health Professions) is defined by applicant and degree program eligibility and provides generous financial aid packages (information available at www.ihs.gov/scholarship). The ultimate goal of the program is to develop health care providers and the next leaders of Indian health communities. Since the IHS began providing scholarship support to AI/AN students to pursue health profession careers in 1978, the program has grown to support, educate and place health care professionals within medically underserved Indian health programs throughout the United States. Today, over 7,500 AI/AN students have received scholarship awards and many have committed to serving their health profession careers at the IHS; some have even returned to serve their own Tribal communities.

The IHS Scholarship Program (IHSSP) uses an electronic system thereby reducing the number paper forms and aims to minimize an applicant's time (i.e. burden hours). The following forms can be found on the IHSSP Website, at: www.ihs.gov/scholarship. This page is also used to solicit and process program applications as well as monitor scholars during their in-school, in-deferment and in-service periods.

This information is collected under the Indian Health Care Improvement Act, Public Law 94-437, as amended, which authorizes the IHS administration of the Preparatory Scholarship Program for Indians, the Pre-graduate Scholarship Program, and the Health Professions Scholarship Program. These programs provide funding to train the health professional personnel necessary to staff IHS health programs and other health programs serving AI/AN people in occupational categories and geographic locations where there are health care personnel shortages.

2. Purpose and Use of Information Collection:

The information collection is used to plan, manage, direct, operate and evaluate the agency's scholarship program. The forms discussed below are used to solicit and process

program applications.

A. *Indian Health Service Scholarship Program e-Application Handbook*

This IHSSP e-Application Handbook provides an overview of the scholarship programs, eligibility requirements, selection criteria, and ranking procedures for recipients and contains the application instructions. The application forms that need to be completed and submitted by all program applicants can be found on the IHSSP Website, at: .

The Application for Participation in the IHSSP is an online e-Application tool. The e-Application must be completed by each applicant. The information provided from this e-application is used to establish a demographic and educational profile of each applicant and includes: contact information, type of scholarship, health career, date of graduation, Tribal affiliation, full-time/part-time status, etc. This information is entered directly and automatically into the IHSSP's scholarship management information system and provides a base for the rating/ranking and eligibility procedures used to make an award.

The Application Checklist, part of the main application, has been replaced with an online e-Checklist, which is automatically generated based on the information provided by the applicant. This e-Checklist becomes a part of the printed e-Application, once the application is submitted by the applicant for funding consideration.

The Faculty/Employer Evaluation, part of the application, collects faculty and/or employer evaluation of the applicant. The information is used as part of the applicant rating process.

The Narrative Statements, part of the application, has been replaced by an e-Narrative, unlimited text field, within the e-Application tool. The applicant must provide a written narrative response to three standard questions. Responses are used as part of the applicant rating process.

1. Form IHS-856-7, "Verification of Acceptance or Decline of Award," is completed by an applicant after they are notified that they have been awarded a scholarship. Before funds can be obligated, the successful applicant must complete and upload this required form to accept or decline the offer of an IHS Scholarship.
2. Form IHS-817, "Health Professions Preparatory and Pre-graduate Education Scholarship Program Agreement - School Year (updated to current years)," is signed by Preparatory (Section 103) and Pre-graduate (Section 103P) applicants to indicate agreement to stated terms and conditions as participants. There is no service payback obligation in this agreement.
3. Form IHS- 818, "Indian Health Scholarship Program Health Professions Contract-

School Year (current years).” 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, with a minimum two-year service obligation. Terms and conditions are detailed on this form.

B. *Indian Health Service Scholarship Program e-Student Handbook*

Indian Health Service Scholarship recipients have access to the latest e-Student Handbook online at the IHSSP Website, www.ihs.gov/scholarship which contains information about the different IHSSP funding programs and related forms, such as: how to maintain eligibility; how to apply for scholarship extension; what they must do if matriculating from a Preparatory or Pre-graduate degree track to a Health Professions degree track; who is eligible for service deferment; how/when to apply for service deferment; and service placement and reporting requirements. The forms listed below, are used during the in-school, in-deferment and in-service periods.

4. Form IHS-856-8, “Recipient's Initial Program Progress Report,” 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.
5. Form IHS-856-9, “Notification of Academic Problem,” 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 IHSSP staff of students experiencing academic difficulty and provides an opportunity to offer appropriate intervention to assist these students to succeed.
6. Form IHS-856-10, “Change of Status,” provides scholarship recipients and IHSSP staff a mechanism to officially document, and have on file, any change of status as identified in the e-Student Handbook found on the IHSSP Website, www.ihs.gov/scholarship, that could have an effect on a recipient’s scholarship status. This form is due immediately if the recipient is expecting a change of enrollment which will affect their scholarship program status.
7. Form IHS-856-11, “Notification of Deferment Intent,” is completed by graduating scholarship recipients requesting deferment of their service obligation to attend post-graduate training. The “Request for Approval of Deferment” form requires 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 IHSSP in order to enroll in a post-graduate clinical training program. This information provided by the recipient indicates the type of program(s) where they will be submitting an application. This allows IHSSP staff the opportunity to: review a recipient’s identified post-graduate clinical training program(s); identify if the program(s) is permitted under IHSSP 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 IHSSP of their program selection by May 31 of their final year in school.

8. Form IHS-856-12, "Preferred Placement," is completed by graduating Health Professions Scholarship Program (Section 104) recipients and is used to identify their preferred payback sites. The IHSSP staff use this information to aide in the placement process of these graduates.
9. Form IHS-856-13, "Notice of Impending Graduation," is completed by graduating Health Professions (Section 104) Scholarship Program 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 recipient's mandatory service obligation.
10. Form IHS-856-14, "Deferment Approval Request," 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 IHSSP analyst of where the recipient has been accepted and intends to begin their post-graduate clinical training. It provides the contact information for the recipient's post-graduate training site and supervisor/advisor: name, title, address, and phone number.
11. Form IHS-856-15, "Placement Update," is used to monitor the placement process of graduating Health Professions Scholarship Program recipients to fulfill their mandatory service obligation.
12. Form IHS-856-16, "Annual Status Report," is used by the Health Professions Scholarship Program recipients who have graduated from their degree program and are either in approved deferment of their service to obtain post-graduate training/ licensure or working at an approved service payback site. This form verifies that the recipient is either successfully continuing with their post-graduate training or working at an approved payback site/position and fulfilling their service obligation requirement.
13. Form IHS-856-21, "Summer School Request," is used by students requesting to attend summer school. The form identifies the summer session dates, enrolled courses and the funding being requested to cover the cost of tuition and applicable fees. The Summer School Request form provides information regarding the recipient's enrollment in a year-round curriculum vs. coursework which must be repeated in order for the recipient to progress in their program of study. It is an essential document for IHSSP budget purposes.
14. Form IHS-856-22, "Change of Name or Address," is used by applicants and recipients to communicate name and/or address changes to IHSSP staff and becomes an official document in the recipient's file, documenting a recipient's name (e.g., via marriage or divorce) or address change. Requests for a change in name must be accompanied by a legal document (e.g., marriage certificate or divorce decree showing the legal change of name). This form should be submitted immediately to

IHSSP staff to update a recipient's personal information in the scholarship program database.

3. Use of Improved Information Technology and Burden Reduction:

Automated information technology is used, as appropriate, for processing the IHSSP applications. The IHSSP has developed and implemented an online application process, which began in 2008 and has undergone significant expansion and refinement during subsequent years. Students complete and submit the online application which incorporates the content from several previously used IHSSP forms, thus reducing the number of "hardcopy" forms needed by the IHSSP to process these applications and the investment (time and money) required to reproduce these forms. Forms that have not yet been incorporated into the online e-Application process are available online at www.ihs.gov/scholarship, 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:

No impact on small businesses or other small entities.

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:

The 60 Day Federal Register notice was published in the Federal Register (88 FR 59929) on August 30, 2023, to solicit public comments on the information collection prior to submission to OMB, as required by 44 U.S.C. § 3506(c) (2) (A). IHS received no outside comments. A 30 Day Federal Register notice was published on October 31, 2023 (88 FR 74499) and all comments will be sent to OMB.

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 will be kept private to the extent allowed by law.

Data gathered on this application form constitutes a system of records as defined under the Privacy Act of 1974. The systems notice for the IHSSP is 09-17-0002, IHS Scholarship Programs, HHS/IHS/OHP. The information collected through use of the IHSSP 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 IHSSP's "e-Student Handbook," and the "e-Application Handbook" found online at www.ihs.gov/scholarship.

The Privacy Act (5 U.S.C. 552a), at subsection (b)(3), requires each agency to publish, for public notice and comment, routine uses describing any disclosures of information about an individual that the agency intends to make from a Privacy Act system of records without the individual's prior written consent, other than those which are authorized directly in the Privacy Act at subsections (b)(1)-(2) and (b)(4)-(12). The Privacy Act defines "routine use" at subsection (a)(7) to mean a disclosure for a purpose compatible with the purpose for which the record was collected. In accordance with Office of Management and Budget (OMB) Memorandum M-17-12, issued January 3, 2017, titled "Preparing for and Responding to a Breach of Personally Identifiable Information," HHS is adding the following two routine uses to all of its system of records notices (SORNs) to authorize HHS to disclose information from each system of records when necessary to obtain assistance with a suspected or confirmed breach of PII or to assist another agency in its response to a breach. The first routine use is a revised version of a routine use prescribed in 2007, in former OMB Memorandum M-07-16. The second routine use is new:

"To appropriate agencies, entities, and persons when (1) HHS suspects or has confirmed that there has been a breach of the system of records; (2) HHS has determined that as a result of the suspected or confirmed breach there is a risk of harm to individuals, HHS (including its information systems, programs, and operations), the federal government, or national security; and (3) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with HHS's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm."

"To another federal agency or federal entity, when HHS determines that information from this system of records is reasonably necessary to assist the recipient agency or

entity in (1) responding to a suspected or confirmed breach or (2) preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity (including its information systems, programs, and operations), the federal government, or national security, resulting from a suspected or confirmed breach.” Both routine uses are compatible with the purposes for which PII is collected in the affected systems of records, because individuals whose PII is included in any federal record system expect that the federal government will secure the information, and because the routine uses are necessary and proper to comply with federal laws imposing security requirements, such as:

The Privacy Act, which requires that PII be secured against potential misuse by unauthorized persons (see 5 U.S.C. 552a(e)(10)); and The Federal Information Security Management Act of 2002 (FISMA), enacted as Title III of the E-Government Act of 2002 (see 44 U.S.C. 3541 et seq.), which requires that federal information and information systems be protected from unauthorized use, disclosure, disruption, modification and destruction, in order to preserve data integrity, confidentiality, and availability.

11. Justification for Sensitive Questions:

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

12. Estimates of Annualized Burden Hours (Total Hours and Wages):

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

The annual burden hours figures include the Number of Respondents (based on number of applicants starting an application), Responses per Respondent (based on number of responses per applicant required to complete application), Total Annual Responses (based on Number of Respondents multiplied by the Responses per Respondents) and the Burden Hours per Response (based on the amount of time it took a sample of students to complete the form).

Annual Burden Hours

Forms	1Data Collection Instrument(s)	Number of Respondents	Responses Per Respondent	Total Annual Response	Burden Hour Per Response*	Annual Burden Hours
	Scholarship Online Application	850	1	850	1.00 (60 min)	850
1	Verification of Acceptance or Decline of Award (IHS-856-7)	300	1	300	0.13 (8 min)	40
2	Scholarship Program Agreement (IHS-817)	60	1	60	0.16 (10 min)	10
3	Health Professions Contract (IHS-818)	225	1	225	0.16 (10min)	38
4	Recipient's Initial Program Progress Report (IHS-856-8)	800	1	800	0.13 (8 min)	107
5	Notification of Academic Problem (IHS-856-9)	20	1	20	0.13 (8 min)	3
6	Change of Status (IHS-856-10)	50	1	50	.045 (25 min)	21
7	Notification of Deferment Intent (IHS-856-11)	60	1	60	0.13 (8 min)	8
8	Preferred Placement (IHS-856-12)	150	1	150	0.50 (30 min)	75
9	Notification of Impending Graduation (IHS-856-13)	170	1	170	0.17 (10 min)	28
10	Deferment Approval Request (IHS-856-14)	60	1	60	0.13 (8 min)	8
11	Placement Update (IHS-856-15)	170	1	170	0.18 (11 min)	31
12	Annual Status Report (IHS-856-16)	200	1	200	0.25 (15 min)	50
13	Summer School Request (IHS-856-21)	100	1	100	0.10 (6 min)	10
14	Change of Name or Address (IHS-856-22)	20	1	20	0.13 (8 min)	3
	Total			3235	225	1282

*For ease of understanding, burden hours per 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.

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:

There are no direct costs to respondents other than their time to voluntarily complete the forms and submit them for consideration. The estimated cost for the Federal government is \$145,223.00 (contractor). The cost of Running the Online Application system and maintaining the database is borne by the contractor. There is no annual cost to the Federal Government for printing the e-Application Handbook, e-Student Handbook or IHSSP forms used by applicants and recipients, because these resources are made available online at www.ihs.gov/scholarships and are no longer printed and mailed to students requesting applications or to IHSSP recipients.

15. Explanation for Program Changes or Adjustments:

The program adjustment is that IHS-856-19 “Lost Stipend Payment” form and the IHS-856-23 “Request for Credit Validation” forms have been removed due to the forms becoming obsolete.

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:

The OMB information will be displayed on information collection forms and within the electronic application 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 (IHSSP applicants).