



To: IHS Scholarship Recipients

From: Director, Division of Health Professions Support

Subject: IHS Scholarship Program Policy and Procedure Clarifications

The Indian Health Service (IHS) Scholarship Program receives many questions each year requesting clarification or additional detail on program policies and procedures. The following clarifications of existing policies are in effect as of the date of this memorandum until changed for all Preparatory and Pre-Graduate (Section 103) and Health Professions (Section 104) scholarship students in school, graduates in deferment and scholars owing or serving a payback obligation (unless an exemption was approved by the Scholarship Program prior to date of this memorandum):

Enrollment and Course Verification

As part of the scholarship application process, scholars submit a “Course Curriculum Verification” form (IHS-856-3) signed by their advisor or counselor detailing the anticipated courses required for the major that the scholar will take during the next academic year. For the new IHS scholarship applicant, this document is used in the decision making process to determine which applicants receive a scholarship for the following school year. For continuation scholarship students, the information on this document is used to determine whether the scholar is meeting graduation related coursework goals and should continue to be funded for the next school year. When the IHS Scholarship Program receives the Tuition and Fees invoice from the scholar’s school and the scholar’s end of semester transcripts, the expectation of the Scholarship Program is that the courses the scholar registered for and/or completed are the same ones that were on the “Course Curriculum Verification” form. Substantial differences can result in rescinding a scholarship award or declining to continue the scholarship award. If there are curriculum changes that are unavoidable (e.g., the school makes changes to the curriculum or classes are canceled or filled) then the scholar is required to inform the IHS Scholarship Program immediately (in writing or via email). Students are advised that courses not required for their approved degree/training program will not be paid for by IHS and will not be counted toward meeting the required hours for determining full-time or part-time status.

Request for a Discipline Change

1. Scholars receiving an IHS Preparatory or Pre-graduate (Section 103) scholarship must re compete as a new scholar applicant if they choose to change their pre-professional discipline.

Example A:

A scholar receiving a Preparatory (Section 103) scholarship in pre-pharmacy wants to switch to pre-nursing. This request will not be processed as a continuation application. The scholar must submit a new application during the normal new application cycle for the Preparatory (Section 103) scholarship program and compete with all other new applicants for a Preparatory (Section 103) scholarship in pre-nursing.

Example B:

A scholar receiving a Pre-graduate (Section 103) scholarship in pre-medicine wants to switch to pre-physical therapy. This request will not be processed as a continuation application. The scholar must submit a new application during the normal new application cycle for the Preparatory (Section 103) scholarship program and compete with all other new applicants for a Preparatory (Section 103) scholarship in pre-physical therapy.

2. Scholars receiving a Preparatory or Pre-graduate (Section 103) scholarship must recompile as a new scholar applicant if they choose to change discipline when entering health professions school.

Example A:

A scholar received support from IHS through a Preparatory (Section 103) scholarship in pre-pharmacy. The scholar decides not to enroll in pharmacy school, but applies to and is accepted in nursing school. The scholar requests continued support for his health professions education by applying as a continuing student to the Health Professions (Section 104) scholarship program. This request will not be processed as a continuation application. The scholar must submit a new application during the normal new application cycle for the Health Professions (Section 104) scholarship program and compete with all other new applicants for a Health Professions (Section 104) scholarship in nursing.

Example B:

A scholar received support from IHS through a Pre-graduate (Section 103) scholarship in pre-dentistry. The scholar decides not to enroll in dental school but applies to and is accepted in a medical technology program. The scholar requests continued support for her health professions education by applying as a continuing student to the Health Professions (Section 104) scholarship program. This request will not be processed as a continuation application. The scholar must submit an application as a new applicant during the normal new application cycle for the Health Professions (Section 104) scholarship program application cycle and compete with all other new applicants for a Health Professions (Section 104) scholarship in medical technology.

Leave of Absence

An IHS scholarship recipient may request a leave of absence when the scholar must discontinue IHS Scholarship Program support for a period of time (between one semester and one academic year). Requests for a leave of absence are considered on a case-by-case basis. Leave of absence requests must be submitted to the IHS Scholarship Program at least 10 working days prior to the start of the semester. A leave of absence cannot be requested during the first year of scholarship

funding. Current scholarship program policy limits a Leave of Absence to a maximum of two consecutive years.

Potentially approvable reasons for a Leave of Absence (LOA) could include:

1. Poor performance on a required course(s) – course(s) must be retaken before the student can continue on his or her academic tract.
2. Taking non-required courses to improve GPA to enhance possibility for admission into a health professions program.
3. Failure to submit a complete continuation scholarship application by the February 28th deadline – the scholar must wait until the next academic year to be considered for scholarship continuation.
4. Need to take additional courses to complete preprofessional requirement or undergraduate degree or graduate degree after using all years of available scholarship support.
5. Time away from school for medical or family reasons (must get approval before leaving school and must be able to resume education/training program after LOA).

Leave of Absence cannot be granted for:

1. Voluntary withdrawal from school (not taking classes).
2. Involuntary removal from school (suspension or removal from professional school or academic program).
3. Requests for time away from normal degree program or a delayed graduation date to complete a joint degree program (e.g., MD/MPH, PharmD/MBA)

Example A:

A scholar fails a required course in nursing school and cannot take the next course in the series until the failed course is retaken and passed. The scholar can apply for a leave of absence for one semester to one year.

Example B:

A Health Professions (Section 104) scholarship recipient forgets to submit the continuation application for the scholarship by the February 28th deadline. The scholar can apply for a leave of absence for one year. This is important since if the scholar does not apply for the leave of absence, he or she must re compete with all other new scholarship applicants in his or her discipline during the next cycle.

Example C:

A scholar receiving a Health Professions (Section 104) scholarship for a medical degree (MD or DO) decides that in addition to her medical degree, she wants to participate in a joint degree program offered by her school and get a Master of Public Health degree. This will require that she take one year off from medical school (after the third year of medical school) and attend the affiliated School of Public Health. The scholar submits a leave of absence request to the IHS scholarship program for a one-year period to complete this dual degree. This request will be denied.

Deferment

Graduated Health Professions (Section 104) scholarship recipients in certain health disciplines may be required to complete additional clinical training before they can begin their service obligation (e.g., physicians, clinical psychologists, social workers and dietitians). Health professionals in certain other disciplines may voluntarily elect to do one additional year of clinical training (pharmacists and optometrists). Note: All requested full-time post graduate training must be submitted to the Scholarship Program for approval prior to entering training and resubmitted annually. Requests for part-time residency programs will not be approved. No period of internship, residency or other advanced clinical training shall be counted as satisfying any period of scholarship obligated service. Individuals entering a non-approved residency or training will be placed in default.

Physicians

Medical students selecting a residency or current residents in training are provided information in the student handbook and through other resources that IHS needs primary care providers. At this time, IHS will no longer approve residencies or fellowships for subspecialties, with the exception of Trauma-Critical Care Fellowship oriented toward rural health care*. For medical school graduates starting residencies on or after March 12, 2009, the only accredited residencies or training that will be granted deferments are:

<u>Residency</u>	<u>Total Years that Deferment May Be Approved</u>
• Family Practice	3 years
• General Internal Medicine	3 years
• General Pediatrics	3 years
• Obstetrics-Gynecology	4 years
• Emergency Medicine	3 years
• General Psychiatry	4 years
• Internal Medicine/Pediatrics	4 years
• Internal Medicine/Family Practice	4 years
• General Surgery	5 years
• Anesthesiology	5 years

<u>Fellowship</u>	<u>Total Years that Deferment May Be Approved</u>
• Trauma-Critical Care	2 Years

* contact the IHS Office of Clinical and Preventive Services at (301) 443-4644 for additional details about approvable fellowships in Trauma-Critical Care.

Clinical Psychologists

The IHS provides scholarships to clinical psychologist students to train to practice as licensed clinical psychologists (with a Ph.D.) able to practice independently without supervision by another licensed clinical psychologist. State licensing boards require that graduate psychologists practice under the supervision of a licensed clinical psychologist for a number of hours (usually 2,000) before they are able to take the state exam to become an independently practicing Licensed Clinical Psychologist (contact your State Psychology Board or visit the Association of State and Provincial Psychology Boards website at <http://www.asppb.net/> for details).

Graduating IHS Health Professions (Section 104) scholarship Clinical Psychologist students are expected to secure a training position (inside or outside the Indian health system¹) to start earning the required clinical hours within 90 days of graduation. The deferment request must be submitted stating the work location where these hours will be completed. The maximum deferment period is 2 years, therefore the psychology graduate must complete all supervised work and obtain licensure within 2 years. The IHS requires in all cases that Health Professions (Section 104) scholarship recipients in clinical psychology complete a Ph.D. program and become a Licensed Clinical Psychologist able to practice independently without supervision by another licensed clinical psychologist before any service will count toward their scholarship service obligation payback commitment.

Social Workers

The IHS provides scholarships to social work students to train to practice as licensed clinical social workers (title varies by state) able to practice independently without supervision by another licensed clinical social worker. State licensing boards require graduate social workers to practice under the supervision of a licensed clinical social worker for a number of hours (usually 2,000) before they are able to take the state exam to become an independently practicing Licensed Clinical Social Worker (contact your State Social Work Board or visit the Association of Social Work Boards at <http://www.aswb.org/> for details). Graduating Health Professions (Section 104) scholarship social work students are expected to secure a training position (inside or outside the Indian health system) to start earning the required clinical hours within 90 days of graduation. The deferment request must be submitted stating the work location where these hours will be completed. The maximum deferment period is 2 years, therefore the social work graduate must complete all supervised work and obtain licensure within 2 years. The IHS requires in all cases that Health Professions (Section 104) scholarship recipients in social work complete a Masters program and become a Licensed Clinical Social Worker able to practice independently without supervision by another licensed clinical social worker before any service will count toward their scholarship service obligation payback commitment.

Dietitians

The IHS provides scholarships to dietitian students to train to practice as a Registered Dietitian (RD). The American Dietetic Association (ADA) requires dietitians do a 900 hour ADA approved internship under the supervision of a RD before they are able to take the ADA exam to become a RD (for information on the internship requirements and exam go to the Commission on Dietetic Registration website at <http://www.cdrnet.org/certifications/rddtr/pathwaysrd.htm>). Some schools will incorporate this internship in their didactic instruction while other schools do not. Where the graduating Health Professions (Section 104) scholarship dietitian students does not have these internship hours included in the didactic training, the scholar is expected to secure a ADA approved internship (inside or outside the Indian health system) to start earning the required clinical hours within 90 days of graduation. The deferment request must be submitted stating the work location where these hours will be completed. The maximum deferment period is 1 year, therefore dietitian graduates must complete all supervised work and become a registered dietitian within a year. The IHS requires in all cases that Health Professions (Section 104) scholarship recipients in dietetics complete a Bachelors degree program and become a

¹ Indian health system includes the Indian Health Service, Tribally managed programs or urban Indian programs.

Registered Dietitian before any service will count toward their scholarship service obligation payback commitment.

Pharmacists

Pharmacists may request a one year deferment to complete a one-year American Society of Health-System Pharmacists (ASHP) or American Pharmacists Association (APhA) accredited postgraduate Year One (PGY1) Pharmacy Residency Program (Hospital, Community or Managed Care only). Information about pharmacist residencies is available at the ASHP website (<http://www.ashp.org/ResidencyDirectory>) or APhA website (<http://www.pharmacist.com>). The scholar must submit the deferment request prior to starting the pharmacist residency. Graduating Health Professions (Section 104) scholarship pharmacist students approved for a residency deferment are expected to secure a residency position (inside or outside the Indian health system) within 90 days of graduation. Deferment requests to complete PGY2 residencies or fellowships will not be approved.

Optometrist

Optometrists may request a one year deferment to complete a one-year postgraduate Residency Program. Residencies are only approved for Ocular Disease/Pathology and Primary Care Optometry residency programs. Scholars should consult with Dr. Mike Candreva, IHS Chief Clinical Consultant for Optometry (email: mike.candreva@ihs.gov) prior to applying to a residency program. Information about optometry residencies is available at the Optometric Residency Matching Services, Inc. (<http://www.optometryresident.org>) or Association of Schools and Colleges of Optometry (<http://www.opted.org>). The scholar must submit the deferment request prior to starting the optometry residency. Graduating Health Professions (Section 104) scholarship optometry students approved for a residency deferment are expected to secure a residency position (inside or outside the Indian health system) within 90 days of graduation.

Service Obligation

Starting Service Obligation Within 90 Days of Graduation or Completion of Training

Within 90 days of graduation or completion of training Health Professions (Section 104) scholarship recipients must start work in a full-time clinical position in their discipline at an approved site or be approved for deferment for additional training. It is the scholar's responsibility to become licensed (for disciplines requiring licensure) and to find an approved position. It is recommended that scholars start looking for a position at least 3-6 months before graduation or completion of training. Scholars who have not reported to the Scholarship Program that they have secured an assignment within 90 days after graduation or completion of training will be subject to involuntary placement by the IHS. Scholars unable or unwilling to secure a position will be placed in default.

Determining an Eligible Service Site and Position

Health Professions (Section 104) scholarship recipients incur a service obligation of one year for each year of scholarship support received with a minimum service period of two years. The law requires that, after graduation or completion of training, the scholar fulfills this service obligation in any of four ways: (1) through service with the IHS; (2) in a program conducted under a contract or compact entered into under the Indian Self-Determination Act (P.L. 93-638), as IHS

amended; (3) in an Urban Indian organization assisted under Title V of the Indian Health Care Improvement Act (P.L. 94-437), as amended; or (4) through private practice in a designated health professions shortage area addressing the health care needs of a substantial number of Indians [25 U.S.C. § 1613a(b)(3)(A)].

The scholar is responsible for ensuring that their service (job and work location) is creditable toward their scholarship obligation. The placement process begins with the scholar contacting sites advertising full-time positions in the scholar's clinical discipline. If the site is interested in hiring the scholar, the scholar will contact the IHS Scholarship Program to request certification that service in that site, in a specifically designated position, will meet the scholar's Scholarship Program service obligation. The IHS Scholarship Program will need the following information, in writing, from the proposed placement site:

1. Explain how placement at this site will meet one of the four service options listed above.
2. Identify the clinical position that the facility is trying to fill (e.g., physician).
3. Assurance that the position is a full-time clinical position in the health professional's discipline (IHS considers full-time employment as working 80 hours every two weeks).
4. Assurance that if the services to be provided by the scholar are included in an IHS contract or compact, that the patients are those authorized to be served under the contract or compact.

If the position is approved by the IHS Scholarship Program and the scholar accepts the position, the scholar must send, to the IHS Scholarship Program, a "verification of employment" letter from the site which includes the scholar's anticipated or actual start date. The scholar is required to provide annual certification from the approved site that he or she has worked in a full-time capacity in the approved clinical position (Form IHS-856-18 Annual Status Report). The scholar must also notify the IHS Scholarship Program if there are any interruptions in the performance of their service payback obligation, such as: maternity leave; extended sick/disability leave; extended Family Friendly Leave; outside training exceeding 10 days per 12 month period; breaks in service related to a change of work site; or any other extended time away from work, so that their service end-date may be recalculated.

Private Practice Option

The law offers an option for scholars to fulfill the service obligation "...through private practice in a designated health professions shortage area addressing the health care needs of a substantial number of Indians [25 U.S.C. § 1613a(b)(3)(A)]." Scholars interested in the private practice option should contact the IHS Scholarship Program for additional details and documentation requirements. The private practice option is only available to those disciplines with a designated Health Professional Shortage Area (HPSA). For more information about HPSAs, visit the Health Resources and Services Administration Shortage Designation website at <http://bhpr.hrsa.gov/shortage/>. The Private Practice Option cannot be used as a means to provide contract or locum tenens services to IHS, tribes, tribal organizations or urban Indian programs.

Research

The purpose of the Scholarship Program is to train health care professionals to provide clinical health care services to Indian people. While research, especially research related to American Indians and Alaska Natives, is beneficial to Indian people, it does not meet the requirements of the Indian Health Care Improvement Act. Requests for service in research positions or clinical positions containing a substantial research component cannot be approved to fulfill a scholar's payback obligation.

Epidemiology

As stated above, the purpose of the Scholarship Program is to train health care professionals to provide clinical health care services to Indian people. Epidemiology is not considered a clinical health service for most health care professions. Only those individuals receiving an IHS scholarship for a Master of Public Health degree with emphasis in epidemiology will be approved to have service in an epidemiology position or clinical position containing a substantial epidemiology component approved to fulfill a scholar's payback obligation.

Full-Time Clinical Practice

Every scholarship recipient fulfilling their service obligation is required to engage in full-time clinical practice in the profession for which he or she was awarded an IHS Scholarship Program contract. The IHS has defined full-time practice as working a minimum of 80 hours every two week period (for an average of at least 40 hours per week). The 80 hours may be compressed into no less than 7 days, with no more than 12 hours of work to be performed in any 24-hour period. Time spent in "on-call" status will not count toward the 80 hours. Hours worked over the required 80 hours per two week period will not be applied to any other workweek.

A full-time clinical practice is defined as follows:

For all health professionals, at least 64 hours of the minimum 80 hours per two week period must be spent providing direct inpatient or outpatient care. These services must be conducted during normally scheduled hospital or clinic hours. The remaining 16 hours per two week period may be spent providing additional patient care and/or performing practice-related administrative activities, with administrative activities not to exceed 16 hours per two week period.

Practice-related administrative activities include teaching, attending staff meetings, supervision of other health care professionals, court appearances, and other non-treatment related activities pertaining to the health care professional's approved position. Supervision of other health professionals is defined as an administrative activity if the health professional being supervised is treating or providing health care services to a patient and billing or documenting such treatment in his or her name. If the supervising health professional is treating the patient and billing or documenting such treatment under his or her name, this activity would be counted as direct clinical services for the supervising health professional.

No more than 7 weeks (35 workdays) per service year can be spent away from the practice for vacation, holidays, continuing professional education, illness, or any other reason. For absences of greater than 7 weeks in a service year or any period of Absence With Out Leave (AWOL), will not count toward the service obligation. The scholar is required to immediately notify the IHS Scholarship Program if there are absences greater than 7 weeks so that the scholar's service end-date may be recalculated.

Default

On occasion, scholars that have been placed in default desire to return to the Indian health system to serve the remainder of their service obligation in place of monetary repayment of their scholarship debt. Scholars who are in “default” status who desire to repay their debt through service must get prior approval from the IHS Scholarship Program. To be eligible, the scholar must meet federal employability standards (even if seeking employment with a Tribe or Tribal organization), have a degree and appropriate licensure in the field they received funding for while in the Scholarship Program and must be in a full-time clinical position in that discipline in an approved IHS, Tribal or urban Indian program.

Example A:

A former scholar received Health Professions (Section 104) scholarship funding for pharmacy school but left pharmacy school and went on to get a Bachelors degree in nursing. The former scholar would not be allowed to meet the service obligation by working at an Indian health system facility as a nurse. Only service as a licensed pharmacist in a full-time pharmacist position would meet the eligibility requirement.

Example B:

A former scholar received Health Professions (Section 104) scholarship funding for medical school. The scholar completed medical school and was approved for deferment for 5 years to complete a General Surgery residency. After completion of the General Surgery residency, the former scholar went into an Orthopedic Surgery fellowship, without IHS approval, and was placed into default. After completion of the Orthopedic Surgery fellowship, the former scholar accepts a position at an IHS hospital as an orthopedic surgeon. This former scholar then requested that the new position be eligible for scholarship service credit. The IHS Scholarship Program would deny this request since the former scholar is not serving in a full-time clinical position in the approved clinical specialty, in this case general surgery. If the former scholar accepted a position as a general surgeon, the IHS Scholarship Program could potentially approve this as a scholarship service payback position, if all other program requirements were met.

Please keep this document with your IHS Scholarship Program Student Handbook. If you have any questions about these policy and procedure clarifications or any other IHS Scholarship Program issue, please contact the IHS Scholarship Program staff at (301) 443-6197.

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Approved:

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