

Indian Health Service Scholarship Program  
**Policy and Procedure Clarifications**

Effective as of June 2011



IHS Scholarship  
Program



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The Indian Health Service (IHS) Scholarship Program issues periodic program policy and procedures clarifications in response to questions received from scholarship recipients and graduates who have deferred or are currently fulfilling their service obligation. The following clarifications of existing policies and procedures are in effect as of the date of this document.

## **FINANCIAL AID**

The IHS Scholarship Program has implemented the following new financial aid policies:

1. Preparatory and Pre-Graduate scholarship recipients will now receive financial aid for tuition and fees *only*.

If you are a Preparatory or Pre-Graduate scholarship recipient, you are encouraged to find other sources of financial aid to assist with the additional educational and living expenses not covered by your IHS scholarship.

2. Health Professions scholarship recipients will continue to receive benefits along with financial aid for tuition and fees.

Health Professions scholarship recipients are required to report their IHS Scholarship Program award to both their school's business office and financial aid office in order to avoid unlawful duplication of federal funding. Any scholarship, grants and fee waivers accepted from sources other than the IHS Scholarship Program must be detailed on your school's invoicing document. The IHS Scholarship Program will deduct this amount from your school invoice before approving final payment. Student loans are not included in this policy since those funds will be repaid following your graduation.

## **ENROLLMENT AND COURSE VERIFICATION**

All applicants *must* submit a **Course Curriculum Verification** form (**IHS-856-6**) signed by their advisor or counselor as part of his application packet. This form outlines the anticipated courses that the applicant will take during the next academic year and is used by the IHS Scholarship Program to determine whether he will receive a new or continuation scholarship award.

If an award is received and official transcripts do not match the Course Curriculum Verification form submitted with his application, the IHS Scholarship Program is authorized to discontinue the recipient's financial aid and rescind his scholarship.

## **HEALTH PROFESSION DEGREE PROGRAM CHANGES**

The IHS Scholarship Program has implemented the following policy changes regarding recipients changing their health profession degree program:

- 1) A Preparatory or Pre-Graduate scholarship recipient must apply as a new applicant if he elects to change his health profession degree track (for example, pre-pharmacy to pre-nursing or pre-medicine to pre-podiatry).
  - 2) A Preparatory or Pre-Graduate scholarship recipient must apply as a new applicant when advancing from his current scholarship to a Health Professions scholarship regardless of whether he is changing degree tracks.
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### **Example A:**

A Preparatory scholarship recipient currently enrolled in a pre-pharmacy degree track elects to enroll in nursing school instead of pharmacy school prior to submitting his continuation application for a Health Professions scholarship. Per IHS Scholarship Program policy, he must apply as a new applicant and compete against other new nursing applicants.

### **Example B:**

A Pre-Graduate scholarship recipient currently enrolled in a pre-dentistry degree track has been accepted into dental school and would like to submit a continuation application for a Health Professions scholarship in dentistry. Per IHS Scholarship Program policy, he must apply as a new applicant and compete against other new dentistry applicants.

- 3) A Health Professions scholarship recipient cannot request a change in his health profession degree track if he is considered in good standing and eligible for graduation.
- 4) A Health Professions scholarship recipient cannot defer his service obligation once he has completed his degree program in order to continue his education in another degree program.
- 5) A Health Professions scholarship recipient who faces academic suspension or dismissal from his degree program or fails to pass the required licensure/certification examinations must contact his IHS Scholarship Program analyst immediately to discuss a change in his degree program. In order to continue as an IHS scholarship recipient, the recipient must be eligible to begin his new degree program at the start of the next academic year.

Required documentation includes:

- a. Letter/proof of impending dismissal from the health professions program for academic reasons
- b. Academic problem/change form signed by the scholar's advisor
- c. Verification of application to one or more health professions degree programs consistent with the requested change of program

Final approval may rest with the Director, IHS.

## **LEAVE OF ABSENCE**

Health Professions scholarship recipients may request a leave of absence (LOA) from the IHS Scholarship Program for a period of time ranging from one semester to one academic year. Requests are considered on a case-by-case basis and must be submitted prior to the start of the semester. An LOA cannot be requested during a recipient's first year of scholarship support. IHS Scholarship Program policy limits an LOA to a maximum of two consecutive years.

Preparatory and Pre-Graduate scholarship recipients' requests for an LOA will not be approved. Preparatory or Pre-Graduate scholarship recipients who require an LOA from their studies must apply as new applicants when they are ready to resume their education.

### **The IHS Scholarship Program will only approve an LOA request for the following reasons:**

- Poor performance on required courses — the student must repeat and pass these courses in order to continue toward his degree
- Medical or family issues requiring a student to leave school for a period of time

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## The IHS Scholarship Program will not approve an LOA request for the following reasons:

- Withdrawal from a health professions degree program, including voluntary withdrawal prior to IHS Scholarship Program approval of an LOA or involuntary withdrawal such as suspension or removal from school
- Requests for time away from a normal degree track or a delayed graduation date to complete:
  - > A joint degree program (for example, an MD/MPH and PharmD/MBA)
  - > Additional majors or minors

### Example:

A Health Professions scholarship recipient decides that in addition to his medical degree, he wants to participate in a joint degree program to obtain a Master of Public Health (MPH) degree. The recipient submits an LOA requesting one year off from medical school to pursue the MPH. The request will be denied since IHS Scholarship Program policy does not permit LOAs to pursue a joint degree program.

## DEFERMENT

Health Professions scholarship recipients in certain degree programs (physicians, clinical psychologists, social workers and dietitians) may be required to complete additional post-graduate clinical training before they can begin their service obligation.

Health Professions scholarship recipients in other degree programs (pharmacists and optometrists) may elect to participate in one year of post-graduate clinical training immediately following graduation from their degree program. Recipients cannot request deferment after they have begun their service obligation.

All Health Professions scholarship recipients must secure a post-graduate clinical training position and begin earning their required clinical hours within 90 days of graduation.

Additional information on the deferment and fulfillment of your service obligation can be found on page 29 of the IHS Scholarship Program Student Handbook.

## Physicians

The IHS will no longer approve residencies or fellowships for subspecialties. **Residency training may not exceed five years or 60 months.** For medical school graduates who started residencies on or after March 1, 2009, the only accredited residencies or training that will be approved for deferment are:

### Three Years:

- Emergency Medicine
- Family Practice
- General Internal Medicine
- General Pediatrics

### Four Years:

- Family Practice/Psychiatry
- General Psychiatry
- Internal Medicine/Family Practice
- Internal Medicine/Pediatrics
- Internal Medicine/Psychiatry
- Obstetrics/Gynecology

### Five Years:

- Anesthesiology
  - General Surgery
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A Health Professions scholarship recipient can request to change his approved residency after completing one to two years of training. A recipient can request up to one year, or 12 months, of deferment to work as a general practitioner at an IHS, Tribal or Urban Indian health center while completing the application process to an alternate IHS-approved residency program. Service as a general practitioner will count toward fulfilling the recipient's service obligation.

If the recipient is unsuccessful in being matched to an alternate residency program, he must inform his IHS Scholarship Program analyst immediately to determine whether he intends to complete his service obligation as a general practitioner at his current site or at an alternate IHS-approved site.

Recipients will be in breach of contract and placed in default if they:

- leave their residency program before completing PGY1
- leave their residency program, with IHS Scholarship Program approval, after completing PGY1 or PGY2 but cannot find work as a general practitioner within 90 days of leaving the program

### **Clinical Psychologists**

State licensing boards require that graduate clinical psychologists practice under the supervision of a licensed clinical psychologist for a specified number of hours (usually 2,000) before they are eligible to take the state exam.

Health Professions scholarship clinical psychology students must submit a deferment request that includes the work location and supervisor contact information where they will complete their clinical hours. The maximum deferment period is two years. The IHS requires that all Health Professions scholarship clinical psychology students complete a PhD or PsyD program and become independent, licensed clinical psychologists before any service will count toward their scholarship service obligation.

### **Social Workers**

State licensing boards require graduate social workers to practice under the supervision of a licensed clinical social worker for a specified number of hours (usually 2,000) before they are eligible to take the state exam.

Health Professions scholarship social work students must submit a deferment request that includes the work location and supervisor contact information where they will complete their clinical hours. The maximum deferment period is two years. The IHS requires that all Health Professions scholarship social work students complete a master's degree program and become independent, licensed clinical social workers before any service will count toward their scholarship service obligation.

### **Dietitians**

The American Dietetic Association (ADA) requires dietitians to complete a 900-hour ADA-approved internship under the supervision of a registered dietitian (RD) before they are able to take the ADA registration exam.

Health Professions scholarship dietetics students must submit a deferment request that includes the work location and supervisor contact information where they will complete their internship hours. The maximum deferment period is one year. The IHS requires that all Health Professions scholarship recipients complete bachelor's degree programs and become registered dietitians before any service will count toward their scholarship service obligation.

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## **Pharmacists**

Health Professions scholarship pharmacy students can request a one-year deferment of their service obligation to complete a one-year American Society of Health-System Pharmacists (ASHP) or American Pharmacists Association (APhA) accredited Post-Graduate Year One (PGY 1) Pharmacy Residency Program (Hospital, Community or Managed Care only).

Deferment requests to complete Post-Graduate Year Two (PGY 2) residencies or fellowships will not be approved.

## **Optometrists**

Health Professions scholarship optometry students can request a one-year deferment to complete a one-year, post-graduate residency program. Only Ocular Disease/Pathology and Primary Care Optometry residency programs will be approved. Scholarship recipients should consult with the IHS Discipline Chief for Optometry (visit [www.scholarship.ihs.gov](http://www.scholarship.ihs.gov) for the most up-to-date contact information) prior to applying to a residency program.

A deferment request must be submitted prior to starting the optometry residency.

## **SERVICE OBLIGATION**

The Director, IHS, acting on behalf of the Secretary of the US Department of Health and Human Services (HHS), may exercise direct placement authority with regard to all Health Professions scholarship recipients whenever unmet health care provider needs are identified within IHS, Tribal and/or Urban Indian health care facilities across the United States.

### **Starting a Service Obligation Within 90 Days of Graduation or Completion of Training**

Health Professions scholarship recipients must begin their employment in a full-time clinical position in their funded health profession within 90 days of graduation or completion of their post-graduate clinical training. Recipients must fulfill their service obligation at an approved service site, unless the IHS Scholarship Program has approved their request for deferment to complete additional post-graduate clinical training. Recipients who do not report to the IHS Scholarship Program that they have secured an assignment within 90 days of graduation or completion of their post-graduate clinical training will be subject to involuntary placement by the IHS. Recipients unable or unwilling to secure a position will be in breach of contract and placed in default.

It is the recipient's responsibility to:

- Begin searching for a position at least three to six months before graduation or completion of training
  - Become licensed (for health professions requiring licensure) and to find an approved position within 90 days of graduation
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## Determining an Eligible Service Site and Position

Health Professions 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 **IHS Scholarship Program Contract (IHS-818)** requires that after graduation or completion of training, the recipient must fulfill his service obligation in one of four ways:

1. At an Indian Health Service program
2. Through a Tribal health program (contracted under the Indian Self-Determination Act [P.L. 93-638])
3. Through an Urban Indian health program (assisted under Title V, Health Services for Urban Indians, of the Indian Health Care Improvement Act [IHCA] [P.L. 94-437])
4. **For physicians, dentists and clinical psychologists only:** Private practice is an employment option in a designated Health Profession Shortage Area (HPSA) in which at least 75% of the patient base from that geographic area are documented members or descendents of federally or state recognized Tribes. This option is only available when there are no identified vacancies in the health professions career category in which you receive funding. Final approval of this option is at the discretion of the Director, IHS.

For more information, visit the Health Resources and Services Administration Shortage Designation website at [www.bhpr.hrsa.gov](http://www.bhpr.hrsa.gov). 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.

You can also fulfill your service obligation by practicing on the reservation of your own Tribe if there is a qualifying program that has a position available for you to fill.

You are responsible for ensuring that the site and position you have chosen are eligible for fulfillment of your service obligation. The placement process begins when you contact sites advertising full-time positions in your health profession. If the site is interested in hiring you, contact the IHS Scholarship Program to request certification that the site and specific position will meet the criteria of your IHS Scholarship Program service obligation.

The IHS Scholarship Program requires submission and approval of a written document from the placement site prior to employment. This document must:

1. Explain how placement at this site will meet one of the four service options (IHS program, Tribal health program, Urban Indian health program and private practice)
2. Identify the clinical position that the facility is trying to fill (for example, physician)
3. Include that the position is a full-time clinical position in the recipient's health profession (IHS considers full-time employment as working 80 hours every two weeks.)
4. State that if the services to be provided by the recipient are included in an IHS contract or compact, that the patients are those authorized to be served under the contract or compact

If the IHS Scholarship Program approves the position and the recipient accepts it, the recipient must send a **Verification of Employment** letter from the site, which includes his anticipated or actual start date.

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Health Professions scholarship recipients must submit an **Annual Status Report** form (**IHS-856-16**) and leave report summary, provided by their local Human Resources Department, to their IHS Scholarship Program analyst until their service obligation is complete. This is required to monitor their service obligation activity and document that they have worked in an approved full-time clinical position in the health profession for which they received funding (while not exceeding the maximum seven weeks or 35 days of leave). This will ensure that credit is given toward their service obligation.

Recipients must notify the IHS Scholarship Program if there are any interruptions in the performance of their service obligation, such as:

- maternity leave
- extended sick leave
- disability or family-friendly leave
- outside training exceeding 10 days per 12-month period
- breaks in service related to a change of work site
- any other extended time away from work

Your service end-date will be recalculated if these interruptions exceed the maximum leave of seven weeks or 35 days.

### **Research**

The purpose of the IHS Scholarship Program is to train health 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 IHClA requirements. Requests for service in research positions or clinical positions containing a substantial research component will not be approved to fulfill a recipient's service obligation.

### **Full-Time Clinical Practice**

To fulfill their service obligation, Health Profession scholarship recipients must adhere to IHS Scholarship Program policies and procedures and engage in full-time clinical practice in the health profession for which they were awarded a Health Professions scholarship, regardless of the policies of their service site.

The IHS Scholarship Program defines a full-time clinical practice for all health professionals as follows:

Full-time practice means working a minimum of 80 hours every two-week period (for an average of at least 40 hours per week). The 80 hours cannot be worked in less than seven days and no more than 12 hours of work can be performed in any 24-hour period. Time spent in on-call status will not count toward the 80 hours. Any hours worked over the required 80 hours per two-week period will not be applied to any other workweek.

Health professionals must spend at least 64 hours of the minimum 80 hours per two-week period 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.

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Teaching, attending staff meetings, supervising other health care professionals, making court appearances and other non-treatment related activities pertaining to the health professional's approved position are considered practice-related administrative activities. 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 name. If the supervising health professional is treating the patient and billing or documenting such treatment under his name, this activity would be counted as direct clinical services for the supervising health professional.

No more than seven weeks, or 35 workdays, per service year can be spent away from the practice for vacation, holidays, continuing professional education, illness or any other reason. Absences greater than seven weeks in a service year or any absent without leave period will not count toward the service obligation. The scholarship recipient is required to immediately notify the IHS Scholarship Program if there are absences greater than seven weeks so that the scholarship recipient's service end-date may be recalculated.

## **DEFAULT**

On occasion, scholarship recipients placed in default may request to return to the Indian health system to serve the remainder of their service obligation in place of monetary repayment of their debt. Recipients placed in default who would like to repay their debt through service must get prior approval from the IHS Scholarship Program. To be eligible, the recipient must have a degree and appropriate licensure in the health profession in which they received funding for an IHS scholarship and must serve in an IHS-approved, full-time clinical position.

### **Example A:**

A former Health Professions scholarship pharmacy student changed his health profession degree track and completed a bachelor's degree in nursing. Since the recipient did not receive IHS Scholarship Program approval for the change, he was declared in breach of contract and placed in default. In an effort to avoid the financial penalties associated with default, the recipient requests to complete his service obligation as a nurse at an Indian health facility. The IHS Scholarship Program would deny this request since he was awarded an IHS scholarship in pharmacy, not nursing. He is only eligible to complete his service obligation as a licensed pharmacist in a full-time pharmacist position.

### **Example B:**

A former Health Professions scholarship medical student completed medical school and was approved for deferment for five years to complete a general surgery residency. After completion of the general surgery residency, the recipient went into an orthopedic surgery fellowship without IHS approval. This resulted in the recipient being in breach of contract and placed in default. After completion of the orthopedic surgery fellowship, the recipient accepts a position at an IHS hospital as an orthopedic surgeon. The recipient requests that the new position be eligible to fulfill his service obligation. This request could be approved with the submission of the appropriate documentation, such as a Notification of Personnel Action form (SF-50, civil service), Call-To-Active Duty (CAD) notice (USPHS Commissioned Corps) or a Tribal hire letter (Tribal employment) as well as a position description and vacancy announcement from the recipient's IHS, Tribal or Urban Indian program employer. The Director, IHS can exercise final approval authority for this matter.

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This document is intended to clarify questions you may have about IHS Scholarship Program policies and procedures. If you require further clarification, please contact the IHS Scholarship Program staff at (301) 443-6197.

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