



## Program Information Notice

DATE: August 13, 2010 DOCUMENT NUMBER: ONC-UBT-PIN-001

SUBJECT: Citizenship Categories Established Under the Notice of Award for the "Information Technology Professionals in Health Care: Program of Assistance for University-Based Training" Grantees: Inclusion of Trainees with Asylum Status, and Guidance Regarding the Date Upon Which the Citizenship Determinations are to be Made

TO: Grantees of the Program of Assistance for University-Based Training (UBT)

The purpose of the Program Information Notice (PIN) is to address the trainee citizenship section of the UBT grantees' Notice of Awards (NoA), section 4f, which provides that trainees must be a citizen, a non-citizen national of the United States or they must have been lawfully admitted for permanent residence at the time of award. We will also permit grantees to include an additional category of individuals for training under this grant – namely those who have been granted asylum status. An individual's asylum status will be demonstrated by possession of a letter from the U.S. Department of Homeland Security and a completed Form I-94, Arrival Departure Record, indicating that the individual has been granted asylum in the United States. We are also providing guidance regarding the date upon which the citizenship determination should be made. Citizenship should be determined as of the date upon which the UBT-funded financial support is drawn down by the grantee on behalf of the named trainee.

If you have any questions or require further guidance, please email [university-based-training@hhs.gov](mailto:university-based-training@hhs.gov)

Sincerely,

/David Blumenthal/

David Blumenthal, M.D., M.P.P.  
National Coordinator for Health Information Technology  
U.S. Department of Health & Human Services

## I. PURPOSE

This Program Information Notice (PIN) pertains to the "Information Technology Professionals in Health Care: Program of Assistance for University-Based Training" (UBT) grantees. It addresses the "Trainee Citizenship" requirements specified in Section 4f of the grantee's Notice of Award (NoA) and provides guidance as to the date upon which the citizenship determination should be made. This notice and the NoA augment the UBT Funding Opportunity Announcement (FOA), which does not address trainee citizenship.

## II. APPLICABILITY

This policy will be applicable to all University-Based Training grantees, and their sub-awardees. It should be used to guide grantee's recruitment of potential students, and the selection and appointment of trainees in UBT-supported training positions.

## III. BACKGROUND

The FOA for the UBT program did not specifically address citizenship requirements of UBT grant-supported trainees. The issue of citizenship was raised during the pre-award phase of the UBT program, and it was addressed in the form a Frequently Asked Question (FAQ) which was made available to all interested parties via the ONC UBT website. The specific FAQ was:

**"B26. Does this program support foreign students with F-1/J-1 Visas?"**

No. Support under these grants is limited to trainees who are U.S. citizens, non-citizen nationals of the U.S., or permanent residents of the U.S. (Individuals who have applied for, but not have officially received, permanent residency would not be eligible.) Applicants should develop their budgets in line with their expected ability to recruit trainees who meet these criteria."

Each UBT grantee's NoA included these restrictions in section "4 f. Trainee Citizenship." That provision provided (emphasis added):

"The individual to be trained must be a citizen or a non-citizen national of the United States or have been lawfully admitted for permanent residence **at the time of award**. A non-citizen national is a person who, although not a citizen of the United States, owes permanent allegiance to the United States. They generally are individuals born in U.S. outlying possessions (American Samoa and Swains Island)

- on or after the date of formal acquisition of the possession, or
- to parents who are non-citizen nationals and have had a residence in the United States or one of its outlying possessions before the birth of that individual.

Trainees must have been lawfully admitted for permanent residence **at the time of appointment**. This must be documented by the individual's possession of an alien registration receipt card I-151 or I-551. Individuals on temporary or student visas are not eligible to receive training grant (or fellowship) support. Please contact the INS about specific issues regarding visa requirements."

UBT grantees have requested additional clarification as to what was meant by the "time of award" in light of the subsequent reference to trainees being "lawfully admitted for permanent residence at the time of appointment" to their training position.. Additionally, a request has been made to allow for the appointment of individuals that have been granted asylum in the United States as UBT-supported trainees.

**IV. TRAINEE CITIZENSHIP REQUIREMENTS**

Grantees should assess a trainee's citizenship, non-citizen national status, or permanent resident status as of the date of their appointment, that is the date upon which the UBT-funded financial support is drawn down by the grantee on behalf of the named trainee. If amended to more clearly reflect what was intended, section (4)(f) of the NoA would read:

Any individual who is trained using UBT funds shall be a citizen or a non-citizen national of the United States or have been lawfully admitted for permanent residence as of the "date of appointment," i.e., the date upon which the UBT-funded financial support is drawn down by the grantee on behalf of the named trainee. A non-citizen national is a person who, although not a citizen of the United States, owes permanent allegiance to the United States. They generally are individuals born in U.S. outlying possessions (American Samoa and Swains Island)

- on or after the date of formal acquisition of the possession, or
- to parents who are non-citizen nationals and have had a residence in the United States or one of its outlying possessions before the birth of that individual.

Non-citizen national permanent resident status is documented by an individual's possession of an alien registration receipt card I-151 or I-551. Individuals on temporary or student visas are not eligible to receive training grant (or fellowship) support. Inquiries about visa requirements should be directed to the Immigration and Naturalization Service (INS).

Furthermore, by virtue of this document, an individual that has been granted asylum in the United States will also be eligible to be considered and selected for a UBT trainee appointment. An individual's asylum status shall be documented by the individual's possession of a letter from the U.S. Department of Homeland Security and a completed Form I-94, Arrival Departure Record, indicating that the individual has been granted asylum in the United States as of the date upon which the UBT-funded financial support is drawn down by the grantee on behalf of the named trainee.

While trainee citizenship was addressed in the NoA, it was not addressed in the FOA. This PIN therefore merely addresses the content of the NoA. As the Notice of Award (NoA) remains in full effect as issued, each UBT grant recipient should read and adhere to the requirements of the FOA, its NoA, and this PIN. The terms and conditions continue to include, but are not limited to, adherence to: (1) HHS Grants Policy Statement (GPS); (2) Federal Regulations (45 CFR 74, Uniform Administrative Requirements for Awards and Subawards to Institutions of Higher Education, Hospitals, Other Non-Profit Organizations and Commercial Organizations; and 2 CFR 230, Cost Principles for Non-Profit Organizations (OMB Circular A-122)); and (3) all applicable requirements of the American Recovery and Reinvestment Act of 2009 (Pub. L. 111-5), including the reporting requirements in Section 1512.