

Supporting Statement for Obligated Service for Mental Health Traineeships: Regulations and Forms

A. JUSTIFICATION

The Substance Abuse Mental Health Services Administration (SAMHSA) requests a revision from OMB to approve the information collection requirements in the regulations for this program and for the remaining form associated with their implementation: Annual Clinical Training Payback Activities Certification and Award Termination Notice approved under OMB No. 0930-0074, which expires on April 30, 2007.

1. Circumstances That Make Information Collection Necessary

Under the authority of Section 303(a)(1) and 520(b)(8) of the Public Health Service (PHS) Act, the Center for Mental Health Services (CMHS) in the Substance Abuse and Mental Health Services Administration (SAMHSA) awards grants to institutions for training instruction and traineeships in mental health and related disciplines. Until October 1, 2000, when Section 303(a)(1) was repealed, the legislation required that recipients of graduate level clinical traineeships in psychology, psychiatry, nursing, or social work (which is not of limited duration or experimental nature) must perform service, as determined by the Secretary to be appropriate in terms of the individual's training and experience, for a length of time equal to the period of support.

Payback obligations were incurred by students who accepted graduate level clinical traineeships for any academic year which began on or after December 1, 1981 through September 30, 2000. The Secretary was required to provide students desiring traineeships a fair summary of the obligation they incur in an entrance interview documented on the payback agreement.

Beginning October 1, 2000, however, the new authorizing legislation did not require a payback obligation, and CMHS/SAMHSA does not require it in the Minority Fellowship Program, the only CMHS/SAMHSA program which required a payback obligation. Therefore, no clinical trainees incurred a payback obligation after September 30, 2000. By the same token, those approximately 300 trainees who had already incurred a payback obligation before October 1, 2000, were not excused from the payback that they had incurred by contract. Thus, the total number of trainees in the CMHS/SAMHSA payback system with an active payback obligation is diminishing. On January 1, 2004 there were 134 trainees with an active payback obligation, and currently there are 83 such trainees. By January 2010, the number is expected to diminish further to approximately 30.

The regulations specify the type of area or entity in which trainees may satisfy their payback obligation, and the activity in which they may engage. Trainees must seek their own employment and the Federal Government does not assume responsibility for actual placements of trainees or payment or subsidization of salaries during the payback period.

Information collection is required under 42 CFR Part 64a - Obligated Service for Mental Health Traineeships (Attachment A). The remaining information collection requirement for which OMB approval is requested is:

42 CFR 64a.105(b)(2) - Reporting: Requires an annual report from trainees on activities which are related to service that fulfills the payback obligation.

The following information collection requirements are no longer applicable as a result of the 2000 statutory change:

42 CFR 64a.104(a) and (b) - Disclosure: Requires the training institution to fully explain and emphasize the service obligation and to obtain the applicant's written agreement to abide by conditions of the training grant.

42 CFR 64a.104(c) (2) and (3) - Disclosure: Requires the training institution to conduct and document an exit interview to remind the trainee of the service obligation, explain consequences of failure to satisfy the obligation and that the Secretary has been notified of the date of termination of the traineeship.

42 CFR 64a.104(c)(1) - Reporting: Requires the training institution to notify the Secretary in writing of the date on which the individual's traineeship is terminated.

2. Purpose and Use of Information

Information received will be used to assure that trainees fulfill their payback obligation.

SAMHSA Annual Clinical Training Payback Activities Certification (APAC) (Form SMA 111-2). As part of the agreement signed prior to accepting the traineeship, and as specified in section 42 CFR Part 64a.105(b)(2) of the regulations, the individual agreed to complete and submit an annual post-award report (Attachment B) concerning pertinent employment and possible name and/or address changes until such time as the total obligation is met. Section 42 CFR Part 64a.105 details in subsection (b) the commencement and duration of service acceptable as payback.

This form essentially adopts the language of the regulations. The first part of the form is used to report to SAMHSA on the payback status of the former trainee and provides instructions to the individual as to which additional sections need to be completed. The Annual Clinical Training Payback Activities Certification is mailed to the former trainee by a SAMHSA contractor approximately one year after the CMHS trainee support is terminated (as documented on the Termination Notice) and annually thereafter until the obligation is fulfilled. The information provided is used to record and monitor annual progress until fulfillment of the payback obligation.

Failure to provide the information required by this form will result in the inability of the Federal Government to be knowledgeable as to who is receiving clinical training support, how much money is involved, and the period of support. Failure to provide the required information could also result in action by the Federal Government to liquidate the obligation by other means.

3. Use of Information Technology

This form has been designed to impose minimum burden on respondents. It requires an original signature and therefore, information technology is not useful at this point in time because the technology for electronic signatures is not yet available in SAMHSA; when it does become available, as required by the Government Paperwork Elimination Act, SAMHSA will convert this form to a form using electronic signatures. The header part of the APAC is computer prepared, based on the file established at the time of receipt of the Statement of Appointment of Trainee and Payback Agreement forms, and verified by the receipt of the Termination Notice. These items include: name, address as in file, grant number, reporting period, and record of payback obligation.

4. Efforts to Identify Duplication

This is a program-specific requirement. There is no duplication.

5. Involvement of Small Entities

Information is not sought from small businesses.

6. Consequences of Information Collected Less Frequently

If the information collected was required less frequently, it would be impossible for CMHS to follow up on trainees, particularly those who change residence or employment frequently.

7. Consistency With the Guidelines in 5 CFR 1320.5(d)(2)

This information collection complies fully with 5CFR 1320.5 (d) (2).

8. Consultation Outside the Agency

A notice soliciting public comment on this data collection was published in the Federal Register on February 8, 2007 (72 FR 5988). SAMHSA received no comments in response to this notice.

The following three former trainees were consulted:

Constance Dallas
UIC College of Nursing
845 S. Damen Ave., Room # 952
Chicago, IL 60612
Tel. 312-413-7859
E-mail: dallascm@uic.edu

Dr. Pamela D. Lee
Project C.O.A.T.
Center for Outpatient Alcoholism Treatment
9730 South Western Ave., Ste. 203
Evergreen Park, IL 60805
Tel 708-425-3000
E-mail pdlee6225@sbcglobal.net

Dr. Dianne L. Davis-Wagner
Norfolk State University School of Social Work
700 Park Ave.
Norfolk, VA 23504
Tel 757-465-5441
E-mail: dwagner390@aol.com

Overall, the trainees found the instructions easy to follow and understand and they had no recommendations for change.

9. Payment to Respondents

No payments or gifts are provided to respondents to participate.

10. Assurance of Confidentiality

No assurances of confidentiality are made to respondents.

11. Questions of A Sensitive Nature

The information requested is not considered to be sensitive in nature.

12. Estimates of Annualized Hour Burden

The estimates of annual burden shown below are based on experience with these forms in the past three years. The estimated hourly cost is now \$20 per hour which is the average entrance level salary for mental health professionals.

| 42 CFR Section | No. of respondents | No. of responses/ respondent | Hours per response | Total Burden hours | Estimated hourly cost | Total Annualized hour cost |
|--|--------------------|------------------------------|--------------------|--------------------|-----------------------|----------------------------|
| 64a.105(b)(2)Annual Payback Activities Certification (Form SMA 111-2 | 57* | 1 | .18 | 10 | \$20 | \$200 |

*The actual number of trainees is now 83, less the estimated number in 3 years of 30 = 53; 53 divided by 2 = 27; 27 + 30 = 57.

13. Estimates of Annualized Cost Burden to Respondents

No capital or start-up costs are incurred above the usual and customary equipment required for doing business. No operating, maintenance or purchase of service costs were incurred over and above the usual and customary cost of doing business.

14. Estimates of Annual Costs to the Government

| | |
|--------------------------------------|-----------------|
| FY 2007 Contract Costs* | \$50,000 |
| CMHS Staff (Management and Clerical) | \$25,000 |
| Total | \$75,000 |

*For the performance of technical, business management, computer data entry reporting and monitoring of trainee appointments and payback related forms including the mailings, review and processing activities.

15. Changes in Burden

Currently there is a total burden of 14 hours. The Program is requesting a total of 10 hours. The program change decrease of 4 hours due to the deletion of the requirement for service payback.

16. Time Schedule, Publication and Analysis Plans

The information collected through this form is not subject to tabulation, analysis or publication.

17. Display of Expiration Date

An exemption for the requirement to display the expiration date is not requested.

18. Exceptions to Certification Statement

This collection of information involves no exceptions to the Certification for Paperwork Reduction Act Submissions.

B. Statistical Methods

Statistical methods are not employed in this information collection.

LIST OF ATTACHMENT

SAMHSA Annual Clinical Training Payback Activities Certification Form
(Form SMA 111-2)