### Supporting Statement for National Health Service Corps Loan Repayment Program Health Resources and Services Administration

## A. JUSTIFICATION

## 1. Circumstances of Information Collection

This is a request for Office of Management and Budget (OMB) approval of an extension to the approval for the burden for the application form for the Health Resources and Services Administration's (HRSAs) National Health Service Corps (NHSC) Loan Repayment Program (LRP). An NHSC/LRP application is required by 42 U.S.C. 2541-1(c). The current NHSC/LRP regulations are found at 42 CFR Part 62. The current OMB approval number for the application (including the Community Site Information Form, the Loan Information and Verification Form, the Authorization to Release Information Form, the Applicant Checklist, and the Payment Information Form) is 0915-0127, which expires on August 31, 2007.

Under the NHSC/LRP, the Department of Health and Human Services (HHS) enters into contracts with selected primary care health professionals who agree to provide full-time primary health services in designated health professional shortage areas (HPSAs). In return for these health services, HHS agrees to repay up to \$35,000 per year toward the health professionals' qualifying educational loans. Qualifying educational loans are loans from Government or commercial lending institutions for actual costs for tuition, reasonable educational expenses, and reasonable living expenses for graduate and undergraduate education.

This request is to continue the approval by OMB for the application package with no changes to the form.

## 2. Purpose and Use of Information

## Application

The purpose of the application form is to obtain information from applicants that is used to consider an applicant for a NHSC LRP contract award. The application form requires information from two types of respondents: the applicants and the lenders who are current holders of outstanding loans made to the applicants. Applicants are requested to submit to the Secretary an application to participate in the program. The application asks for personal, professional and financial information required to determine the applicant's eligibility to participate in the NHSC/LRP. In addition, for each of the loans for which repayment is being requested, the applicant is asked to complete a one-page form that identifies past and present lenders, purpose of the loan, original date and amount of the loan, current balance and interest rate, and default status.

The NHSC/LRP is required by statute to give priority to applicants whose training is in a health profession or specialty determined by the Secretary to be needed by the NHSC, to applicants who have characteristics that increase the probability that the individual will

continue to serve in a HPSA after the period of obligated service, and to applicants who are from a disadvantaged background.

As part of the application process, the applicant must request a copy of their National Practitioner Data Bank (NPDB) Report. This Report provides critical information concerning an applicant's clinical and professional activities, which is used in selecting applicants for awards.. The applicant can obtain the "Practitioner Request for Information Disclosure" form (OMB No. 0915-0126) on the NPDB web site at http://www.npdb-hipdb.com or by calling 1-800-767-6732.

The online application is the same as the one previously approved as a paper form in the last clearance request. The application package contains the following forms that will be used by Program applicants and participants: the Loan Application Form, the Community Site Information Form, the Loan Information and Verification Form, the Authorization to Release Information Form, the Application Checklist, and the Payment Information Form.

## 3. Use of Improved Information Technology

The NHSC LRP application has been converted to an online form, having been a paper based application since its inception. The application instructions and form are available on the NHSC web site at <a href="http://nhsc.bhpr.hrsa.gov/applications">http://nhsc.bhpr.hrsa.gov/applications</a> .

## 4. Efforts to Avoid Duplication

The information requested in the application and regulations is specific to the applicant and unique to this program.

## 5. Involvement of Small Entities

The forms will not have a significant impact on small entities.

## 6. <u>Consequences if Information is Collected Less Frequently</u>

The selection process for the NHSC/LRP applicants necessitates the collection of required data prior to the Secretary entering into a contract for repayment of qualifying education loans. In the absence of collection of these data, review, selection, and approval of qualified applicants cannot be carried out. The NHSC/LRP requests the information once each fiscal year until an applicant is awarded a NHSC/LRP contract.

# 7. <u>Consistency with the Guidelines in 5 CFR 1320.5 (d)(2)</u>

This information collection is consistent with 5 CFR 1320.5 (d)(2).

# 8. <u>Consultation Outside the Agency</u>

The notice required in 5 CFR 1320.8(d) was published in the *Federal Register* on April

24, 2007, Vol.72, No. 78, page 20346. No comments were received.

The program has surveyed the following applicants and lender to obtain constructive feedback to improve the application, improve efficiency, and minimize the collection burden. The comments on the clarity and ease of completion of the forms were positive. There were no suggestions for changes or revisions. Persons contacted include:

**Applicants:** 

Christie Bowling, LPC 2606 Quicksand Road Jackson, KY 41339 606-666-2124

Kay Christian, PA P.O. Box 2146 Redway, CA 95560 707-923-2783

Ruben Pina, LPC 1010 N Moorefield Road Mission, TX 78572 956-566-2678

#### 9. Remuneration of Respondents

Respondents will receive no remuneration.

#### 10. Assurance of Confidentiality

Data collected on the individual NHSC/LRP application forms is stored in a system of records as defined under the Privacy Act of 1974. The application is included in the System of Records Notice, "The Public Health Service and National Health Service Corps Health Care Provider Records System" (09-15-0037). Information provided on each selected application will be maintained for at least 2 years and up to 10 years. This is necessary to permit the monitoring of NHSC/ LRP participants through the completion of their NHSC/LRP service commitments.

The Right to Financial Privacy Act (RFPA), P.L. 95-630, regulates the Federal Government's access to the financial records of individuals maintained by a financial institution. Section 1102(a) prohibits Government access to financial records unless one of five procedures are used and the records are "reasonably described." The procedure being used by the NHSC/LRP is described in Section 1104(a), which provides that a customer may authorize disclosure of his financial records if he signs a statement identifying the records and specifying the recipient and purpose of the disclosure. The Loan Information and Verification Form complies with this requirement.

### 11. <u>Questions of a Sensitive Nature</u>

The Social Security number is required because the amount of loan repayment made must be reported to the Internal Revenue Service as income to the program participant. It is also required by the Debt Collection Act of 1982, to permit collection of claims resulting from participants defaulting on the loan repayment agreement.

## 12. Estimates of Annualized Hour Burden

Form	Number of Respondents	Responses per Respondent	Total Responses	Hours per Respondent	Total Hour Burden	Hour Cost	Total Hour Cost
Application Form	1920	1*	1920	.5	960	\$20	\$60,00 0
Community Site Information Form	1920	1	1920	.25	480		
Loan Information and Verification Form	1920	3	5760	.25	1440		
Authorization to Release Information	1920	1	1920	.1	192		
Applicant Checklist	1920	1	1920	.2	384		
Lenders	80	1	80	.25	20		
Total	2000		13,520		3476		

The estimates of reporting burden are as follows:

\*An applicant response includes completion of one of each of the above-listed forms, and may include the completion of additional Loan Verification Forms (one for each educational loan for which he or she is seeking repayment).

## Basis for estimates:

Applicants: the program estimates that the number of applicants will average 1920 per year for the next 3 years with approximately 80 lenders. Each applicant must complete an application once per fiscal year until they are awarded a NHSC/LRP contract. The application consists of general information (name, address, school attended, degree obtained, where to be employed, etc.) and information for each loan to be repaid (average of 4 per applicant). Information from different applicants may vary, but it appears that the burden estimates for the forms remain reasonable based on consultation with previous respondents.

## 13. Estimates of Annualized Cost Burden to Respondents

There are no capital or start-up costs to respondents. There are no operation or maintenance costs to lenders; all information is maintained for usual business purposes.

## 14. <u>Estimates of Annualized Cost to the Government</u>

The processing of the NHSC/LRP application forms is handled by a contractor. This contract is monitored by one FTE at the GS-13 level, who spends 25% of her time providing technical assistance and training for a cost of \$21,750 (25% of \$87,000 = \$21,750). The annual contract costs to the Government are \$1,230,751.00.

## 15. <u>Changes in Burden</u>

The current OMB inventory contains 2,163 hours for this program. The new request is for 3,476 burden hours, an increase of 1,313 hours. The previous approval contained an annual estimate of 1,500 for the number of respondents for this program. Due to the availability of an online application, the program is expecting an increase in the number of applications. The new estimate is for approximately 2,000 annual respondents, an increase of 500 respondents for this activity. The resulting increase in burden hours is a program adjustment of 1,313 hours.

The overall number of *responses* to this project has increased due to a revision in the way the table provides the respondent information. In all previous submissions to OMB, the table contained a single row for the entire application package for applicants, and a single row for lender information. Because of the revised Information Collection Request, Review and Approval System (ICRAS) electronic submission system used by the Department of Health and Human Services, each form is now required to have a single row in the table representing the burden for that individual form. As a result, the number of overall responses appears to have increase significantly, from 1,500 to 13,520, an increase of 12,020. This is a program adjustment due to a revision in the way the estimate of total responses is determined as required by the ICRAS system.

## 16. <u>Time Schedule, Publication and Analysis Plans</u>

There are no plans for tabulation, statistical analysis, or publication of data requested.

## 17. <u>Exemption for Display of Expiration Date</u>

No exemption is requested.

18. <u>Certifications</u>

This project fully complies with the requirements in 5 CFR 1320.5(d)(2). The certifications are included in this package.