# Supporting Statement for The Application for Participation in The National Health Service Corps Scholarship Program

#### A. JUSTIFICATION

### 1. Circumstances of Information Collection

The Health Resources and Services Administration's (HRSA's) Bureau of Clinician Recruitment and Service (BCRS) is requesting a reinstatement with change of OMB approval of the application form for the National Health Service Corps (NHSC) Scholarship Program (OMB No. 0915-0146). This submission is a revision of a previously approved information collection activity. The newly revised application is required in order to make NHSC scholarship determinations for the next academic year. The NHSC scholarship application has not been revised since the early 1990's; the new application form will collect information with <u>clear practical utility</u> for making determinations for award.

The legislative authority for the NHSC Scholarship Program is the Public Health Service Act, Title III, Section 338A, C-H, [42 U.S.C. 254l, m-q], as amended by Public Law 101-257 on October 26, 2002, and implemented by Federal Regulations Title 42 Code of Federal Regulations, Parts 23 and 62 and administrative guidelines in effect as of December 2002.

The purpose of the NHSC Scholarship Program is to ensure an adequate supply of health professionals to provide primary health services through a culturally competent, interdisciplinary team of clinicians to populations located in health professional shortage areas (HPSAs) identified by the Secretary of the Department of Health and Human Services. HPSAs can be found in rural and urban communities across the Nation and the several United States territories and possessions.

Under the NHSC Scholarship Program, students seeking to become allopathic physicians, osteopathic physicians, dentists, behavioral and mental health professionals, family nurse practitioners, nurse midwives and physician assistants, and, if needed by the NHSC, students of other health professions (including mental health professionals) are offered the opportunity to enter into a contractual agreement with the Secretary under which the Department of Health and Human Services agrees to pay the total school tuition, required fees, and a stipend for living expenses. The duration of scholarship support is at the discretion of the student; minimum support is for 1 year, maximum support is for 4 years. In exchange, the scholarship recipient agrees to provide full-time primary care clinical services at a site in a federally designated HPSA as assigned by the NHSC. The minimum service commitment is 2 years; the maximum is 4 years.

For 33 of the 35 years of the program, the NHSC Scholarship Program has been used as a recruitment incentive to attract individuals committed to serving the underserved. Individuals interested in participating in the scholarship program must complete a NHSC application form. Individuals are selected for awards based on meeting the required eligibility criteria, which is determined from the information provided in the application form.

Approval is being requested for the revised application for purposes of the NHSC Scholarship Program selection and award process.

## 2. Purpose and Use of Information

The information collected in the application is needed to determine which applicants are qualified and suitable to receive scholarship awards. Applicants are competitively selected for awards according to the criteria required by Federal statute and regulation, and the priority staffing needs of the NHSC. As stated in the PHS Act, Section 338A, [254l](d)(2), in providing contracts under the Scholarship Program, the Secretary shall give priority to:

- "(A) first, to any application for such a contract submitted by an individual who has previously received a scholarship under this section or under section 758;
- (B) second, to any application for such a contract submitted by an individual who has characteristics that increase the probability that the individual will continue to serve in a health professional shortage area after the period of obligated service pursuant to subsection (f) of this section is completed; and
- (C) third, subject to paragraph (B), to any application for such a contract submitted by an individual who is from a disadvantaged background."

As specified in the regulations (42 CFR Part 62.6(b) and (c)), in deciding which applications will be approved, first priority will be given to individuals who have previously received a scholarship under the NHSC Scholarship program or under section 758, "authorizing scholarships for first-year students of exceptional financial need. (2) Second priority will be given to applicants who are entering their first year of study. (c) Selection. (1) In selecting participants, the Secretary will take into account consideration those factors which he or she determines necessary to assure effective participation in the Scholarship Program. These factors may include, but not be limited to (i) work experience, (ii) community background, (iii) career goals, (iv) faculty recommendation, (v) and academic performance."

The application form seeks to collect information that can be used to identify scholars who, when they complete their health professions education, will specialize in the delivery of primary health services, complete their period of obligated service in an acceptable manner, and subsequently be retained in practice in an area that has a shortage of health care personnel.

The scholarship application captures information that is relevant to the three priority areas specified above in order to identify applicants with the greatest potential to fulfill the objectives of the Scholarship Program. It is particularly important to have an application that provides information by which the program can assess which individuals are most willing and able to serve the underserved.

The NHSC Scholarship Program uses the information collected in the application to select applicants for scholarship awards. All information is used to determine that individual applicants meet the required criteria and interest in practicing in a HPSA.

### **Application Form**

The application has the following sections:

**Section A. Assurance**: This section presents the specific service responsibilities of a scholar, and possible penalties for failure to serve, as a series of statements the applicant must either accept or decline. This section serves as the <u>first</u> screen of the electronic application: the applicant must accept <u>all</u> five statements to continue the application process. Once the applicant successfully completes this screen, Section A must be printed, filled out by hand, signed and dated, and submitted to the program with the **Additional Application Materials** (as noted below).

**Section B. Eligibility**: This section presents the specific eligibility requirements for participation in the program as six questions to be answered Yes or No. This section serves as the <u>second</u> screen of the electronic application: the applicant must meet <u>all</u> the eligibility requirements to continue the application process.

**Section C. General:** This section collects general information needed for administrative purposes (e.g., name, address, and program history, credit status).

**Section D. Degree Program:** This section collects information about the degree or certificate program for which the applicant is requesting a scholarship and the current status in the program.

**Section E. Background:** This section collects background information about the applicant.

**Section F. Career Goals:** This section contains five questions to be answered by the applicant with short essays. These essays will be assessed on specialty choice, future plans, and practice community and health care preferences to determine the suitability of the applicant to participate in the program.

**Section G. Certification**: This section certifies completeness and accuracy of the information contained in the application, and acknowledges the possible consequences for making false statements. This section must be printed, signed and dated, and submitted to the program with the **Additional Application Materials** (as noted below).

**Additional Application Materials**: In addition to the application form, applicants must submit indicators of academic performance and a faculty recommendation. These new materials provide information relevant to the factors listed in 42 CFR 62.6 (c)(1) iv and v; faculty recommendation and academic performance.

**The NHSC Application Bulletin** contains instructions, authorization to release information on enrollment, and verification of enrollment. In addition, the bulletin contains general information about the scholarship program, its background, and purpose.

### 3. Use of Improved Information Technology

The scholarship application is available electronically.

# 4. Efforts to Identify Duplication

The information requested in the application is specific to the applicant and unique to the NHSC program. No similar information is collected from this group of individuals.

### 5. Involvement of Small Entities

This data collection does not involve small businesses or other small entities.

## 6. Consequences if Information is Collected Less Frequently

The selection process for making NHSC Scholarship Program scholarship awards must be completed annually prior to the beginning of the academic school year. In the absence of collecting this data, review, selection, and approval of qualified applicants cannot be carried out.

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

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

# 8. Consultation Outside The Agency

The notice required in 5 CFR 1320.8(d) was published in the *Federal Register* on August 3, 2007 (Vol. 72, No. 149, page 43283). No comments were received.

The changes to the Application Form and revision of the selection procedures were reviewed by the National Advisory Council on the National Health Service Corps during its June, 2007 meeting. The list of members participating in the review of the changes to the application is attached, as well as the charter for the council.

### 9. Remuneration of Respondents.

Respondents will not be remunerated.

### **10.** Assurance of Confidentiality

Data collected on the individual NHSC Scholarship Program application form constitutes a system of records as defined under the Privacy Act of 1974. The program is covered by an existing System of Records, Public Health Service (PHS) and National Health Service Corps (NHSC) Scholarship/Loan Repayment Participants Records System (09-15-0037).

All information collected through use of the NHSC Scholarship Program application process, as well as storage of this information, will be in compliance with the Privacy Act. A Privacy Act Notice, which describes the authority for collecting the information, the routine uses which may be made of the information collected and the necessity of reporting to receive scholarship award consideration, is contained in the scholarship Applicant Information and Instruction Bulletin.

### 11. Questions of a Sensitive Nature

There are no sensitive questions in the application. The Social Security number is required because the amount received for the stipend must be reported to the Internal Revenue Service as income to the scholarship recipient. The Social Security number is also required by section 4 of the Debt Collection Act of 1982 (26 U.S.C. 6103) to permit collection of claims resulting from participants defaulting on the service obligation required under the scholarship award. The amount of scholarship support then becomes a debt owed the Federal Government.

### 12. Estimates of Annualized Hour Burden

Estimates of respondent burden are as follows:

Form Name	Number of Respondents	Responses per Respondent	Hours per Response	Total Burden Hours	Wage Rate	Total Hour Cost
Application	1,800	1	3	5,400	<b>\$</b> 15	\$81,000
TOTAL	1,800			5,400		\$81,000

### **Basis for Estimates**

The number of NHSC Scholarship Program applicants is estimated to average 1,800 per year for the next 3 years. Based on recent history, the NHSC Scholarship Program will award approximately 230 multi-year scholarships each year for the next 3 years.

Based on the new information requested in the scholarship application, it is estimated that it will take an average of 3 hours to review the instructions and complete the form for the Scholarship Program.  $(1,800 \text{ applicants } \times 3 \text{ hour/response} = 5,400 \text{ hours}).$ 

Scholarship applicants may be students and/or may be in the workforce. Since applicant employment status is mixed, a value of \$15 per hour is estimated as the average wage rate per hour.

### 13. Estimates of Annualized Cost Burden to Respondents

There are no capital or start-up costs for this activity, and there are also no operation or maintenance costs with this application.

#### 14. Estimates of Annualized Cost Burden to the Government

The average annual costs to the government for the scholarship application processing, review, and determination are as follows: One project officer FTE at 10% time at a GS 13 level is required for a total of \$8,225 and annual contract costs are approximately \$45,000. The total annual cost to the government is \$53,225.

### 15. Changes in Burden

The OMB inventory of approved burden previously contained 3,100 hours for the NHSC application. This request is for 5,400 hours, for an increase of 2,300 hours. The increase in

burden is a result of a program change due to the revisions in the application form and the new supplemental information. The previous burden estimate of 1 hour per respondent has been increased to 3 hours per respondent to include time for obtaining transcripts and one academic reference. The total increase of 2,300 burden hours for the application is a program change.

### 16. Time Schedule, Publication and Analysis Plans

There are no plans for tabulation, analysis, or publication of the NHSC application information. The information is used solely for determination of scholarship awards.

# 17. Exemption for Display of Expiration Date

The expiration date will be displayed.

### 18. Certifications

This project fully complies with the guidelines set forth in 5 CFR 1320.9. The required certifications are included in this package.