

**1National Institute of Food and Agriculture
U.S. Department of Agriculture
OMB No. 0524-0047**

**Application Forms and Reporting Requirements for the Veterinary Loan Repayment
Program (VMLRP)**

1SUBJECT: Supporting Statement for Paperwork Reduction Act Submission for the Application Forms and Reporting Requirements for the Veterinary Loan Repayment Program (VMLRP)

A. JUSTIFICATION

1. CIRCUMSTANCES MAKING COLLECTION OF INFORMATION NECESSARY

In January 2003, the National Veterinary Medical Service Act (NVMSA) was passed into law adding section 1415A to the National Agricultural Research, Extension, and Teaching Policy Act of 1997 (NARETPA). This law established a new Veterinary Medicine Loan Repayment Program (7 U.S.C. 3151a) authorizing the Secretary of Agriculture to carry out a program of entering into agreements with veterinarians under which they agree to provide veterinary services in veterinarian shortage situations.

The purpose of the program is to assure an adequate supply of trained food animal veterinarians in shortage situations and provide USDA with a pool of veterinary specialists to assist in the control and eradication of animal disease outbreaks.

The information for collection allows the National Institute of Food and Agriculture (NIFA) to request from VMLRP applicants information related to eligibility, qualifications, career interests, and recommendations necessary to evaluate their applications for repayment of educational indebtedness in return for agreeing to provide veterinary services in veterinarian shortage situations. The information for collection will also be used to determine an applicant's eligibility for participation in the program. It is particularly important that the information be provided to NIFA in a standardized fashion to ensure equitable treatment for all applicants.

2. HOW, BY WHOM, AND PURPOSE FOR WHICH INFORMATION IS TO BE USED

NIFA published a Request for Applications (RFA) in the Federal Register and on the NIFA website for VMLRP loan repayment applications from individual veterinarians on April 30, 2010. Interested individuals submit the necessary information to NIFA using the application forms.

NIFA convenes a peer review panel to review submitted and eligible applications and make recommendations to the NIFA Program Manager. The panelists may be composed of food supply veterinary medicine experts from Federal and state agencies, as well as individuals from institutions receiving Animal Health and Disease Research Program funds under section 1433 of NARETPA, private associations, private citizens, etc.

This information collection allows the peer review panel to evaluate qualifications, career interests, and recommendations for VMLRP applications for repayment of educational indebtedness in return for agreeing to provide veterinary services in veterinarian shortage situations. The information for collection is also used by NIFA staff to determine an applicant's eligibility for participation in the VMLRP.

3. USE OF IMPROVED INFORMATION TECHNOLOGIES

NIFA will provide this form on its website as a PDF-fillable form and/or a Microsoft Word document when the Request for Applications for VMLRP awards is published in the *Federal Register*. Submissions will be accepted via mail or fax.

4. EFFORTS TO IDENTIFY DUPLICATION

This is the first loan repayment program for NIFA. There is no similar information available which can be used or modified to meet the information needs of this program. The information requested is specific to the program and need only be submitted when applying for a VMLRP award.

5. METHODS TO MINIMIZE BUDGET OF SMALL BUSINESSES OR ENTITIES

Small Businesses are not impacted by this information collection.

6. CONSEQUENCE IF INFORMATION COLLECTION WERE LESS FREQUENT

Individual veterinarians interested in applying for a loan repayment agreement with the VMLRP will submit VMLRP application forms only during the 90-day application cycle. NIFA will normally publish a RFA on an annual basis. The submission of information must be timely in order to receive applications in NIFA, properly examine loan documents for compliance, and to accomplish steps to establish and carry out the review process.

7. SPECIAL CIRCUMSTANCES FOR INFORMATION COLLECTION

- Requiring respondents to report information to the agency more often than quarterly:

Program participants (successful applicants) will be required to verify that the terms of the VMLRP contract are being met on a quarterly basis. Subsequent quarterly loan repayments will not be disbursed until this verification is provided. This report will be due ten business days after the end of each three month interval during the VMLRP contract for the previous three month period. Program participants are responsible for notifying NIFA of any changes in the service being provided in the specified shortage situation during the three-year contract period. Failure to provide the updated information may result in the termination of the VMLRP contract and the program participant may be subject to penalties as outlined in Section C, Paragraph 3 of the contract.

- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

USDA does not require a written response to a collection of information in fewer than 30 days after receipt of it.

- Requiring respondents to submit more than an original and two copies of any document;

USDA does not require respondents to submit more than an original and two copies of any document.

- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

The agency usually does not require respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years following completion of a service agreement.

- In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

This information collection does not include statistical surveys.

- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

This information collection does not require the use of statistical data classification that has not been reviewed and approved by OMB.

- That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use;

This information collection does not require a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

- Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it instituted procedures to protect the information's confidentiality to the extent permitted by law.

This information collection does not require respondents to submit proprietary trade secret, or other confidential information.

8. FEDERAL REGISTER NOTICE

The notice for this information collection appeared in the *Federal Register* on January 20, 2010 (74 FR 32788). NIFA received 16 comments, however none of these addressed the collection instrument or estimated burden..

CONSULTATIONS WITH PERSONS OUTSIDE THE AGENCY

NIFA solicited stakeholder input at a public meeting on Monday, September 15, 2008, and through written comments. In addition, NIFA is working with the NIH DLR to provide certain administrative services and support.

SUMMARY OF COMMENTS

The Interim Rule was published on July 9, 2009 [74 FR 32788-32798] with a 60-day comment period to establish processes and procedures for (a) designating veterinarian shortage situations and (b) administration for the VMLRP. Comments were required to be received by September 8, 2009. We received thirty-eight sets of comments from individuals, including practicing veterinarians, farmers, and students, and several veterinary professional associations and organizations.

We considered all comments received in the development of the final rule and updated the timeline for implementing the program in the final rule. Additionally, the AVMA and AAVMC offered many suggestions on how to administer the program and many of their recommendations were adopted in this regulation. The comments from the students and veterinarians were useful in that they provided valuable information on how the loan repayment program should be structured in order to appeal enough for a student to practice or specialize in food supply veterinarian medicine.

Three commentors expressed concern about the exclusion of education loans other than those obtained for the Doctorate of Veterinary Medicine (or equivalent) from the VMLRP. A commenter contends that a veterinary student's undergraduate education is an integral component of their academic veterinary career. Because the NVMSA legislation specifically states that loan repayments provided under this section may consist of payments on behalf of participating individuals of the principal, interest, and related expenses on government and commercial loans received by the individual for attendance of the individual at an accredited college of veterinary medicine resulting in a degree of Doctor of Veterinary Medicine or the equivalent, we are making no changes in response to these comments.

Seven commentors observed that disqualifying individuals who consolidated their undergraduate student loans with veterinary school loans would unfairly cause a large group of highly qualified veterinarians ineligible for the VMLRP. We agree and will allow individuals who consolidated their veterinary school loans with other educational loans (e.g. undergraduate) to apply for the VMLRP; however, only the eligible portion of the consolidation will be repaid by the VMLRP, thus Parts 3431.9(b)(3) and 3431.15(b)(4) have been removed from the final regulations.

Three commentors requested clarification on the definition for "accredited college of veterinary medicine" as there are multiple accreditation bodies that could be included in the definition. Two of the three commentors recommended that the definition be modified to specify accreditation by the AVMA Council on Education, a specialized accrediting agency recognized and authorized by the U.S. Department of Education. We agree and have modified the definition to specify that a veterinarian must have attended a college of veterinary medicine accredited by the AVMA Council on Education to be eligible to apply to the VMLRP.

One commentor asked NIFA to give serious consideration to including U.S. citizens who are studying to become veterinarians in veterinary schools in the Caribbean basin. We welcome veterinarians that studied abroad to obtain their Doctorate in Veterinary Medicine degree (or equivalent) to apply for the VMLRP as long as the professional veterinary medicine degree was obtained from a college of veterinary medicine accredited by the AVMA Council on Education, a list that includes fourteen schools outside the United States as of October 21, 2009.

Two commentors recommended adding "animal health" to the definition of "practice of food supply veterinary medicine" and the areas that have food supply veterinarian shortages. We agree and have added "Animal health" to both definitions.

One commentor recommended that "caprine" be added to the definition of "Food animal". We agree and have added "Caprine" to the definition.

Three commentors suggested that the State Animal Health Official be required to consult with the State Veterinary Association and other interested parties within the state when identifying underserved areas within a state. We strongly recommend this course of action, but will not include this requirement in the regulations.

One commentor expressed concern that low density agricultural areas will be regarded as less important than areas of heavily concentrated agriculture. Another commentor recommended that representatives

of federal agencies be included on an official review panel. We took these comments into consideration during the development of the solicitation for nominations for veterinarian shortage situations.

One commentor urged USDA to examine the feasibility of establishing an indexing system whereby each shortage situation that is designated is awarded a weighted score for severity of shortage. As with other review processes conducted by NIFA, the review panel will evaluate the composite qualitative and quantitative arguments presented in the submitted nomination packages against criteria described elsewhere in this notice. The panel will classify each shortage situation as either “Recommended for designation” or “Not recommended for designation”.

One commentor suggested that solicitation notices be published on an annual basis instead of a biennial basis. Another commentor requested clarification on the frequency of the need to apply for the designation of shortage areas and the need to reassess a designation once it is filled by a veterinarian enrolled in the VMLRP. We presume that, over time, the shortage situation priorities of a state will change due to veterinarians relocating to fill critical areas designated by the VMLRP. To address changing conditions, we will assess the relative demand for reprioritization of shortage situation distribution within the states on an annual basis. However, we reserve the right to conduct this solicitation on a biennial basis to save administrative costs and to adhere to the aggressive annual program schedule and/or to respond to funding fluctuations.

One commentor stated that the Interim Final Rule did not address how applicants would be chosen for specific shortage areas. We will establish the evaluation criteria and process and determine the makeup of the application review panel before the application period opens. Applicants will be ranked based on their qualifications relative to the attributes of the shortage situation applied for.

One commentor recommended that licensure not be a blanket requirement for eligibility to apply for the VMLRP, but that veterinarians should be in compliance with state and local regulations, including having the appropriate certifications and licenses, in the jurisdiction of the shortage situation. We agree and updated the regulations to reflect that licensure is required only if it is mandated by the state and local regulations in which the shortage situation is sited.

Three commentors stated that it was not clear to what degree the VMLRP would apply to veterinarians working for the federal government. We recognize that NVMSA is intended to address a national problem and have acknowledged that approximately 10 percent of the loan repayment awards will be made available to address public practice shortages and at least 90 percent of funds will be awarded to private practice food animal veterinarians to assure appropriate emphasis as requested by the legislation set forth by Congress. Hence, some designated veterinarian shortage situations may be Federal positions.

Fourteen commentors stated the importance of making VMLRP awards to include veterinarians with established practices in shortage areas as a form of retention in addition to the recruitment of veterinarians to shortage areas. We agree. The SAHO may identify and submit a shortage situation based on the assessment that there is a great risk of losing an established veterinarian in a given shortage situation and that the need to retain a veterinarian in this area is of utmost importance.

One commentor suggested that 90 percent of awards be devoted to veterinarians involved with food animal medicine and rural practice (mixed large animal and small animal) who have at least 30 percent or more involvement with food animal species. Another commentor recommended that the 10 percent of the awards offered to mixed animal practitioners be devoted to the food animal discipline for at least half of their practice. We agree that there is practical value in identifying service commitment requirements for practitioners of food supply veterinary medicine of less than 100 percent. Accordingly, all three shortage situation types identified in the nomination form allow for different percentages of

full-time equivalent commitment, commensurate with a variety of different public and private practice scenarios.

Two commentors urged NIFA to establish a mentoring program for participants in the program. We agree and will investigate options for including a mentoring component.

Two commentors questioned the need to have a debt threshold for individuals to be eligible to apply to the VMLRP. We disagree. If there are veterinarians with minimal amounts of educational debt that are willing to commit for a number of years of service to a shortage situation, they should be able to do so without the VMLRP benefit. The goal of the VMLRP is to fill shortage situations with veterinarians that would have otherwise gone elsewhere. NIFA also aims to maximize the number of agreements, and entering agreements with those with negligible debt would create an additional administrative burden (both cost and personnel time) as an individual's debt level has no effect on the administrative cost to process an application and execute a service agreement. Establishing a debt threshold eliminates the administrative burden of processing applications from those who will scarcely benefit from the VMLRP.

Two commentors expressed concern about the focus of the VMLRP. One commentor stated that "It seems that many of these types of programs end up helping those who have a background and obvious desire to already go into such a career." The other commentor cited a program where "most of the nurses, and other health care workers, only remain there as long as is necessary to receive the payback and leave as quickly as possible thereafter leaving the reservation's health care no better off than it was before." We plan to conduct an impact evaluation on the VMLRP to assess whether the desired outcomes are achieved.

Five commentors stated concerns about rising educational debt for aspiring veterinarians. One commentor questioned whether the maximum annual loan repayment of \$25,000 was sufficient. Another commentor stated that adjustments need to be included to allow for increases in annual loan limits. Yet another commentor agreed that the \$25,000 repayment level will help address the educational debt load. We will continue to monitor trends among participants, applicants, and graduating veterinarians to ensure the VMLRP remains successful in providing a financial incentive to fill shortage areas, while maximizing the number of agreements at the same time.

9. DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEEES

The agency does not provide payment or gift directly to respondents.

10. CONFIDENTIALITY PROVIDED TO RESPONDENTS

The information collection will be handled in accordance with the Freedom of Information Act and the Privacy Act.

11. QUESTIONS OF A SENSITIVE NATURE

Information will be requested involving the applicant's name, address, Social Security number (SSN), service payback obligations, employment data, professional performance and credentialing history of licensed veterinarians; personal, professional, and demographic background information; financial data including loan balances, deferment, forbearance, and repayment/delinquent/default status information. This information will be used to: (1) Identify and select applicants for the VMLRP; (2) monitor loan

repayment activities, such as payment tracking, deferment of service obligation, and default; and (3) assist NIFA officials in the collection of overdue debts owed under the VMLRP.

12. ESTIMATE OF BURDEN

It is estimated that it will take each applicant approximately ten hours to complete the forms. It is also estimated that it will take each recommender approximately one hour to complete the recommendation form and a representative from a financial institution approximately fifteen minutes to complete a section of the loan information form. Each application form is PDF-fillable with checkboxes and text-limiting fields to minimize the overall burden.

For each award recipient, a service verification form will be completed on a quarterly basis. It is estimated that it will take approximately fifteen minutes to complete the service verification form.

ANNUALIZED COSTS TO RESPONDENTS

Based on the median salary of an early career veterinarian (1-4 years experience) of \$65,000 or an hourly wage of \$31.25, NIFA estimates the annual cost burden to applicants for the value of their time to complete and submit an application to be \$62,500 ($\$31.25 \times 2,000$). A recommender will typically be a veterinarian with 10-20 years experience, which has a median salary of \$80,000 or an hourly wage of \$38.46, thus NIFA estimates the annual cost burden to recommenders for the value of their time to complete and submit a recommendation to be \$23,076 ($\38.46×600).

Type of Respondent and Form	No. of Respondents	Annual Frequency per Response	Total Annual Responses	Hours per Response	Total Hours
<i>Applicants:</i>					
Applicant Information	200	1	200	1	200
Personal Statement	200	1	200	6	1260
List of Recommenders	200	1	200	.5	100
Loan Information	200	2	400	.5	200
Contract	200	1	200	.25	50
Certification for Applications	200	1	200	.25	50
Intent of Employment	200	1	200	1	200
Applicants subtotal	200	---	---	---	2,000
<i>Recommenders:</i>					
Recommendation	600	1	600	1	600
Recommenders subtotal:	600	1	600	1	600
<i>Financial Institutions:</i>					
Loan Information	400	1	400	.25	100
Financial Institutions subtotal:	400	1	400	.25	100
<i>Award Recipients</i>					
Service Verification	60	4	240	.25	60
Award Recipients subtotal:	60	4	240	.25	60
Grand Total:	1260	---	---	---	2,820

The median salary was derived from PayScale (<http://www.payscale.com/research/US/Job=Veterinarian/Salary>).

13. CAPITAL/STARTUP COSTS

There are no capital or startup costs for this activity.

14. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

1The staffs responsible for processing applications are full-time employees ranging in grade levels GS-9 and GS-15.

Job Title	Action	Hourly Pay*	Time per Action	Total per Application	Total for Applications
Program Assistant, GS-9	Evaluates applications for preliminary review	\$28.04	2 hours	\$56.08	\$11,216
Program Manager, GS-15	Evaluates applications, coordinates panel members, announces awards	\$67.21	6 hours	\$403.26	\$80,652
TOTALS			8 hours	\$459.34	\$91,868

*A step 5 was used in determining the hourly pay for the grade level.

15. REASONS FOR CHANGE IN BURDEN

There is an adjustment increase in the number of respondents, responses and burden hours. The number of application increased from 100 to 200. The adjustment increase is due to the estimate for application was made prior to the inaugural application cycle when there was no base to project the number of application.

There is a program change increase in the number of respondents, responses, and burdens of 60 hours due to adding the Service Verification form for award recipients.

We also added the Service Verification form now that award recipients exist for this program.

16. TABULATION, ANALYSIS AND PUBLICATION PLANS

USDA has no plans to publish information collected.

17. SEEKING APPROVAL TO NOT DISPLAY OMB APPROVAL DATE ON FORMS

Each VMLRP Application Form (8 total) and the Service Verification form (1 total) will display the OMB control number and burden statement.

18. EXCEPTION(S) TO THE CERTIFICATION STATEMENT

USDA claims no exceptions to the certification statement