

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 for the burden of the application forms for the Health Resources and Services Administration's (HRSA) 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 Employment Verification and Community Site Information Form, the Loan Information and Verification Form, and the Authorization to Release Information Form) is 0915-0127, which expires on October 31, 2010.

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 \$50,000 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, which has had no substantive changes since its last Notice of Action on 6/9/2009. A nonsubstantive change, to collect and maintain basic contact information from NHSC applicants who complete the program, is included in this collection of information and described in this Supporting Statement. Additionally, two forms (NHSC Checklist and Lender Form) have been deleted due to redundancy.

2. Purpose and Use of Information

Application

The purpose of the application form is to obtain information from an applicant that is used to consider an applicant for a NHSC LRP contract award. 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.

The application process is completely online. The application package contains the following forms that will be used by Program applicants and participants: the LRP Application Form, the Employment Verification and Community Site Information Form, the Loan Information and Verification Form, the Authorization to Release Information Form, and the Self-Certification Form. This submission no longer includes the NHSC checklist and the NHSC Lender Form because of redundancy and duplication of burden.

Once health professionals complete NHSC service, basic contact information such as name, phone number, email address, state (of residence and/or employment), discipline and specialty, uniformed services rank and status (active duty or retired), and NHSC service category (Scholar, Loan Repayor or Volunteer) will be collected and maintained in a database to enable HRSA to communicate with NHSC alumni. Establishing an active network of current and alumni NHSC health professionals will allow them to serve as a potential resource for the recruitment or mentoring of future and current primary health care providers to practice in underserved communities.

3. Use of Improved Information Technology

This information collection activity is fully web-based. Application instructions and forms are available on the NHSC web site at <http://nhsc.hrsa.gov/loanrepayment/apply.htm>.

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 information collection will not have a significant impact on small entities.

6. Consequences if Information is Collected Less Frequently

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. 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 April 8, 2010, Vol.75, No. 67, page 17923. The 30 day notice was published in the *Federal Register* on August 23, 2010, Vol.75, No. 162, page 51821. No comments were received.

The program has surveyed the following applicants 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:

Aniika Jackson, DDS
600 E. 8th Street #3T
Kansas City, MO 64106
504-913-4835

Felina Ortiz, NM
9704 Triana Place NW
Albuquerque, NM 87114
505-553-5084

Adam Tahiru, PA
3883 West 25th Lane
Yuma, AZ 85364
760-530-4528

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 is 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 comply with this requirement.

The basic contact information that is maintained for the NHSC alumni database, including name, phone number, email address, state (of residence and/or employment), discipline and specialty, will be kept private. The data would be collected and accessed through a secure web portal to allow for the safe collection and storage of information.

11. Questions of a Sensitive Nature

The Social Security number is 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

The estimates of reporting burden are as follows:

Form	Number of Respondents	Responses per Respondent	Total Responses	Hours per Respondent	Total Hour Burden	Hour Cost	Total Hour Cost
LRP Application Form	5,175	1*	5,175	.3	1,553	\$20	\$31,060
Employment and Verification and Community Site Information Form	5175	1	5,175	.75	3,881	\$20	\$77,620
Loan Information and Verification Form	5,175	3	15,525	.3	4,658	\$20	\$93,160
Authorization to Release Information	5,175	1	5,175	.1	518	\$20	\$10,360
NHSC Alumni Database	5,000	1	5,000	.20	1,000	\$20	\$20,000
Self-Certification Form	5,175	1	5,175	.1	518	\$20	\$10,360
Total			41,225		12,128		\$242,560

*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 5,175 per year for the next 3 years. 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. The program estimates that 5000 applicants may complete their NHSC service. These alumni will take an estimated 0.2 hours annually to update or provide basic contact information for the alumni database.

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. Estimates of Annualized Cost to the Government

The processing of the NHSC/LRP application forms is handled by a contractor for an annual cost of \$2,025,759.00. This contract is monitored by a division director, who spends 25% of her time providing technical assistance, training and monitoring the contractor's performance for a cost of \$38,750. The secure database to maintain basic contact information of NHSC applicants who complete their service is being developed by a contractor for a cost of \$45,000. The annual contract costs to the Government are \$2,109,509.00.

15. Changes in Burden

The current OMB inventory contains 8,030 hours for this program. The new request is for 12,128 burden hours, an increase of 4,098 hours. The previous approval contained an annual estimate of 4,433 for the number of respondents for this program, which included the increase in funding from the American Recovery and Reinvestment Act of 2009. Due to an additional increase in funding from the Affordable Care Act of 2010, the program is expecting the number of applications to increase to approximately 5,175 annual respondents. This is an increase of 742 respondents for this activity. To collect and maintain basic contact information from applicants who complete their NHSC service, an additional 1,000 hours of annual burden is requested. The net program change increase in total annual burden hours is 12,128, 11,128 of which is due to new statute and 1,000 of which is due to agency discretion. Two forms have been deleted due to redundancy and duplication.

16. Time Schedule, Publication and Analysis Plans

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

17. Exemption for Display of Expiration Date

No exemption is requested.

18. Certifications

This project fully complies with the requirements in 5 CFR 1320.5(d)(2).