Health Resources and Services Administration National Health Service Corps Site Application

SUPPORTING STATEMENT

A. Justification

1. <u>Circumstances of Information Collection</u>

This is a request for a renewal of approval from the Office of Management and Budget (OMB) to the Health Resources and Services Administration's (HRSA) National Health Service Corps (NHSC) Site Application, formerly the Site Recruitment and Retention Assistance Application, OMB Control Number 0915-0230. Approval for the current site application expires 09/31/2011. The legislative authority stating the need for the information collected in this application is found in Section 333 [254f] (a)(1) of the Public Health Service Act.

The site application is designed to collect data from health care facilities for use in determining their eligibility to become an NHSC-approved service site and to employ NHSC-supported health care professionals. Additionally, the data collected will verify the need and placement for NHSC-supported health professionals at any particular site. NHSC-approved service sites include Federally Qualified Health Centers (FQHCs), FQHC Look-Alikes, Rural Health Clinics, Indian Health Service Clinics, Public Health Departments, as well as a number of other health facilities which are listed in the site application.

The NHSC was established by Congress to eliminate designated Health Professional Shortage Areas (HPSAs). HPSAs are geographic areas, facilities or population groups determined by the Secretary of Health and Human Services to have a shortage of health professionals. The NHSC provides funding support to encourage selected primary health care professionals to practice in HPSAs, and the NHSC Site Application is the mechanism by which sites can be approved and employ NHSC scholars and clinicians participating in the NHSC Scholarship Program or NHSC Loan Repayment Program (LRP).

To attract health care professionals to serve in HPSAs, the NHSC was authorized to assist selected primary health care professionals with education related costs or student loan repayment. Currently, the NHSC Scholarship Program supports the training of primary care physicians, nurse-midwives, nurse practitioners, physician assistants and dentists. The NHSC LRP is available to the above identified health care professionals, as well as dental hygienists and mental and behavioral health professionals upon completion of their training. Both the Scholarship and Loan Repayment assistance programs incorporate a service obligation based on the level of support received.

Each year, HRSA provides new scholarship and loan repayment awards. In accordance with the authorizing legislation, HRSA is required to identify sites with site positions (previously known

as site vacancies) at which Scholarship recipients and LRP participants are authorized to fulfill their service obligation.

The NHSC Scholarship legislation requires the identification of a total number of site positions equal to not less than one but not more than two sites for each available Scholarship recipient in the placement year. The exact number of site positions will change throughout any one placement year in accordance with the number of available clinicians and positions.

In order to identify the required number of site positions, the NHSC must carefully review all site applications. Each year approximately 3,000 new or recertifying site applications are reviewed for eligibility to employ NHSC-supported health care professionals. NHSC-approved service sites are able to recruit clinicians through the NHSC National Recruitment Site List (formerly referred to as the NHSC Job Opportunities List), a comprehensive list of qualifying job openings across the nation and a resource for NHSC applicants and members.

2. Purpose and Use of Information

The data contained in the site application facilitates the process of identifying and communicating the availability of service site positions where Scholars and LRP participants may fulfill their service obligation.

The NHSC Site Application specifically identifies the current and long term needs of the sites, which facilitates the recruitment of necessary health care professionals; it also indicates the retention levels of NHSC clinicians who have fulfilled their service obligation and remained at the site.

Collection of site application data allows HRSA to determine the eligibility of a facility for approval as a service site for NHSC clinicians, by providing information on program activities and accomplishments as requested or required.

The information that is collected by the NHSC is utilized for recruitment purposes and to appropriately match clinicians and service sites. This activity collects a limited set of information pertaining to the site itself and the different services that are available at the site. This information is posted online to provide clinicians with a more informative description of the sites that are available on the NHSC National Recruitment Site List.

Given that the NHSC Site Application is a modified version of the previous Site Recruitment and Retention Assistance Application, there are no significant programmatic changes that have occurred. The site application has undergone minor technical changes, such as the adoption of an online format to provide concision and enhance data accuracy. In addition, questions regarding private practice and teaching health facilities have been added to provide clarity, as they serve as nuances of the site types supported by the Affordable Care Act.

3. Use of Improved Information Technology

The NHSC Site Application is an interactive, online-based application which is fully accessible through the NHSC web site at http://nhsc.hrsa.gov/. The NHSC National Recruitment Site List is a comprehensive list of qualifying job openings across the nation and a resource for NHSC applicants and members. The NHSC National Recruitment Site List is maintained by the site point of contact and/or the NHSC when appropriate.

4. Efforts to Avoid Duplication

The NHSC Site Application does not duplicate any other application. This application is the only known mechanism which collects the site specific information that can be used for determining eligibility. Data involving main/administrative and satellite sites, site types or classifications, and NHSC clinicians needed, are not available from any other source. Such data is routinely collected through the site application or site visits conducted by the NHSC Division of Regional Operations (DRO) for internal management purposes.

5. Involvement of Small Entities

The information required is the minimum amount necessary to determine eligibility and verify the need for NHSC-supported health care professionals. The information requested does not have a significant or substantial impact on small entities or small businesses.

6. <u>Consequences If Information Collected Less Frequently</u>

If the information were collected less frequently, the NHSC could not provide an accurate and comprehensive listing of service site positions. In addition, there would be no method for the program to accurately report on the full scope of supported activities.

The following are three examples that support the need for the data collected through the NHSC Site Application:

- A. Health care providers who are in the current year's placement cycle are within one year of completing their education and training and do not have the time or means to identify current site positions on their own. If the NHSC did not facilitate the identification of sites in need, a significant segment of the underserved populations would not receive health care services.
- B. Data from the application will be used by the NHSC for internal monitoring and evaluation of program operations and effectiveness. Such data will greatly assist the NHSC in placing health care professionals at sites with the greatest needs based on analysis of the data. The NHSC could identify trends in communities and/or parts of the country as to shifts in population profiles. This would allow the NHSC to respond by directing that more, less, and/or different types of services be provided as appropriate.

C. Based on experience with other data systems, the application information would be utilized by a number of organizations in establishing national, State and local policy. Such organizations include the Department of Health and Human Services, HRSA, National Association of Community Health Centers (NACHC), National Rural Health Association, Migrant Health Association, American Public Health Association, and State and local governments.

7. Consistency with the Guidelines in 5 CFR 1320.6 (d) (2)

The data will be collected in a manner consistent with guidelines contained in 5 CFR 1320.6.

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

The notice required by 5 CFR 1320.8(d) was published in the *Federal Register* on June 9, 2011 (Vol. 73, No. 84, pages 23471-23472). No comments were received. Respondents who reviewed the application for burden, comprehension, and format, are:

Community Clinic at MCC 4601 N. 19th Street Waco, TX 76708-1261 (254) 755-0195

Community Health Alliance of Pasadena-Del Mar 3161 East Del Mar Boulevard Pasadena, CA 91107 (626) 389-8715

Highbridge Outpatient Clinic, Astor Child Guidance Center 1490 Shakespeare Ave. Bronx, NY 10452 (718) 732-7080

9. <u>Remuneration of Respondents</u>

Respondents will not be remunerated.

10. <u>Assurance of Confidentiality</u>

No information identifying individuals is being collected.

11. **Questions of a Sensitive Nature**

There are no questions of a sensitive nature.

12. Estimates of Annualized Hour Burden

The following table summarizes the annual estimate of burden for completing the Application:

Instrument	Number of	Responses per	Total	Hours per	Total hour	Wage	Total Hour
	Respondents	Respondent	Responses	Response	Burden	Rate	Cost
NHSC Site Application	3000	1	3000	.5	1500	\$18.00	\$27,000

Hour and Cost Estimates

The estimates contained in the table reflect an annual number of 3,000 applicants. The information requested takes approximately 30 minutes to complete by a mid-level administrative staff person at a wage rate of \$18.00 per hour.

13. Estimates of Annualized Cost Burden to Respondents

There are no capital or start-up costs nor are there any operation and maintenance costs.

14. Estimates of Annualized Cost to the Government

Based on experience with the application, it is estimated that the annual cost to the Federal government for data verification and processing will be in the amount of \$37,436.

Instrument	GS-Level/Base Pay Rate	Project Time per FTE	Number of FTEs	Total Annual Cost
NHSC Site Application	GS-12/\$74,872	.10	5	\$37,436

The variables used to estimate the annualized cost to the government is contained in the table above. The application will be reviewed and analyzed by five federal employees with an average pay rate of \$74, 872 annually. It is estimated that the employees will spend approximately 10% of their work time on this project.

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

There are changes to the estimate of burden. Specifically, the total hour burden has increased from 1450 to 1500 due to the increase in the number of respondents. Furthermore, there are minor additions to the survey which do not affect the hours per response. The current burden for this activity in the OMB inventory of approved collections is for 3,000 respondents with 1,500 total burden hours.

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

Time Schedule: Applications are accepted throughout the calendar year, and are renewed every three years. Clinicians serve for fiscal years, from October 1 to September 30. Determination of site eligibility is made within approximately 6 to 8 weeks of the application submission. The official site list is published in September and is updated and maintained by the site point of contact provided in the application and/or the NHSC when appropriate.

Analysis Plans: Application information is reviewed for determination of eligibility as an NHSC Service Site; internal review of the information includes summarizing numbers of clinicians by discipline and specialty; number of rural and number of urban sites.

17. Exemption for Display of Expiration Date

The expiration date will be displayed.

18. <u>Certifications</u>

This information collection fully complies with the guidelines in 5 CFR 1320.9. The required certifications are included in the package.