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Supporting Statement
New Request for Data Collection by the Health Resources and Services Administration's
Bureau of Health Professions Division of Nursing
Nurse Anesthetist Traineeship (NAT) Program Application

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Terms of Clearance: None

A.   Justification

1. Circumstances Making the Collection of Information Necessary
This request is for approval from the Office of Management and Budget (OMB) for data collection activities with applicants for the Nurse Anesthetist Traineeship Program in the Health Resources and Services Administration's Bureau of Health Professions. The authorizing legislation for the NAT Program is Title VIII, Section 811(a)(2) of the Public Health Service (PHS) Act, (42 U.S.C. 296j(a)(2)), as amended by Section 5308 of the Patient Protection and Affordable Care Act, Public Law 111-148. The purpose of the NAT Program is to increase access to nurse anesthetist care for underserved populations. NAT grants provide funding for traineeships for licensed registered nurses enrolled as full-time students in an accredited master's or doctoral Nurse Anesthesia Program in the (1) first 12 months of study and/or (2) beyond twelve months of study. Traineeships will pay all or part of the costs of the tuition, books, and fees, and the reasonable living expenses of the individual during the period for which the traineeship is provided.

The NAT Program is a formula-based grant program where award determination is based on the data collection provided in the application. HRSA developed the data collection for applicants to the NAT Program. Award amounts are based on enrollment, graduate data and two funding factors (Statutory Funding Preference and Special Consideration) reported on the NAT Tables. Additionally, the data will be used to ensure programmatic compliance with legislative mandates, report to Congress and policymakers on the program accomplishments, provide programmatic analysis, justify budget requests and formulate future budgets for these activities submitted to OMB and Congress.

History of the NAT Program
The Nurse Training Act of 1964 (P.L.88-581) added Title VIII to the Public Health Service Act. The Nurse Training Act of 1971 (P.L.92-158) broadened Title VIII authority. The Nurse Training Amendments of 1979 (P.L. 96-76) authorized Nurse Anesthetist Traineeships. The Nurse Training Act of 1985 included legislative changes; funding for Nurse Anesthetist Programs was one amendment to the law.

Nurse Anesthetists have been providing anesthesia care to patients in the United States for 150 years and have been the main providers of anesthesia care to United States military personnel since World War I. The NAT Program addresses the need for Certified Registered Nurse Anesthetists (CRNAs). CRNAs are the sole providers of anesthesia in nearly 100 percent of rural hospitals and a major provider of anesthesia in inner cities. Without immediate access to nurse anesthetists, rural and underserved populations are at risk for delays or for a total absence of anesthesia services in local areas. CRNAs are anesthesia professionals who safely administer

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more than 34 million anesthetics to patients each year in the United States." Source: American Association of Nurse Anesthetists

2. **Purpose and Use of Information Collection**
This information is used by eligible applicants who are applying annually for the NAT Program. Eligible applicants are collegiate schools of nursing, nursing centers, academic health centers, State or local governments and other public or private nonprofit entities determined appropriate by the Secretary that submit an application and are accredited for the provision of a nurse anesthesia educational program by designated accrediting organizations. The school must be located in the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, the Northern Mariana Islands, American Samoa, Guam, the U.S. Virgin Islands, the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau. Eligible Applicants must be accredited by the Council on Accreditation (COA) of Nurse Anesthesia Educational Programs of the American Association of Nurse Anesthetists.

Information from the NAT Tables is used in making determinations regarding applicants meeting one or both Funding Factors (Statutory Funding Preference and/or Special Consideration) and to determine the award amount. In order to carry out its essential function, HRSA-BHPr has historically had a need to annually collect data from applicants.

3. **Use of Improved Information Technology and Burden Reduction**
The Federal Financial Assistance Management Improvement Act of 1999 (P. L. 106-107) and the President's Management Agenda aim to simplify the Federal financial assistance application process and create a single website to apply for Federal assistance. In the previous application cycle, there were six (6) NAT Tables which have now been reduced to three (3) NAT Tables to eliminate duplicity and reduce burden with the newly implemented BHPr Performance Measures for the NAT Program. The following data collection is now eliminated: Table 3 – NAT: Ethnicity Data; Table 4 – NAT: Race /Disadvantaged Data and Table 5 – NAT: Age and Gender Data; thereby reducing overall burden associated with data collection and reporting.

4. **Efforts to Identify Duplication and Use of Similar Information**
Historically, there was no duplication of reporting with this activity. The information that is requested in the NAT Tables was unique to the nursing traineeship programs. With the implementation of the BHPr Performance Measures the NAT Tables are being streamlined to three data collection tables to eliminate duplication and reduce burden. The data collection is revised to capture information that is most salient to program management and award determination in a manner that is appropriate to the legislative intent and also the administration of the program. The application data collection is pre-award information while the BHPr Performance Measures data is post-award information.

5. **Impact on Small Businesses or Other Small Entities**
The application process will use the SF-424 R&R Short Form which will minimize burden on applicants as this is a formula-based grant program. This project should not have a significant impact on small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

Data collected in the NAT application is a key element of program administration and maintaining compliance with the legislation. This annual information is essential in serving as an instrument for determining (1) grantee award amounts and (2) eligibility for meeting one or both of the Funding Factors (Statutory Funding Preference; Special Consideration). Collecting data less frequently would inhibit HRSA BHPr's ability to institute the NAT Program, provide program specific information, generate pre-award reports and provide award amounts for the July 1 annual start date. It is imperative that respondents submit the data collection annually.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The proposed data collection is consistent with guidelines set forth in 5 CFR 1320.5(d)(2).

8. Comments in Response to the Federal Register Notice/Outside Consultation

Section 8A: Federal Register Notice

The 60-day Federal Register Notice was published in the Federal Register on July 30, 2013, vol.78, No. 146; pp. 45931 and 45932. There were no public comments.

Section 8B: Outside Consultation

In developing and finalizing the proposed data collection, the following grantees / applicants were contacted in August 2013 to obtain their views on the data collection – clarity of information and instructions and the burden. The grantees / applicants provided critical feedback to assist BHPr in the streamlining measures and the revised data collection to reduce redundancy and burden.

Shari Burns, CRNA, Ed.D.
Director, Nurse Anesthesia Program
Midwestern University
9555 N. 59th Ave. Glendale AZ 85308
(623) 572-3455 (voice)
Email Address: sburns@midwestern.edu

Terri M. Cahoon, DNP, CRNA
Nurse Anesthesia Program Chair
Samford University – Ida V. Moffett School of Nursing
800 Lakeshore Drive
Birmingham, Alabama 35229
(205) 726-2401(voice); (205) 726-4179 (fax)
Email Address: tmcahoon@samford.edu

Marc Code, MSN, CRNA
Assistant Professor, Director, Program of Nurse Anesthesia
Samuel Merritt University
450 30th Street, Oakland, CA 94609
(510) 869-6821 (voice); (510) 869- 6282 (fax)
Email Address: mcode@samuelmerritt.edu

Patricia Dillon, PhD, RN
Director of Graduate, RN to BSN and RN to MSN Nursing Programs
Associate Professor
LaSalle University
19000 W Olney Avenue
Room 4413
Philadelphia, PA 19141-1108
(215) 951-1322 (voice)
Email Address: dillonp@lasalle.edu

Michele E. Gold, CRNA, PhD
Program Director – Associate Professor of Clinical Anesthesiology
University of Southern California
1540 Alcazar Street CHP 205
Los Angeles, CA 90089-9012
(323) 442-2012 (voice); (323)442-1701 (fax)
Email Address: mgold@usc.edu

Sharon J. Hawks, DNP, CRNA
Program Director – Assistant Professor
Duke University School of Nursing
DUMC 3322, Durham, NC 27710
(919) 684-9347 (office); (919) 684-8352 (fax)
E-mail Address**:** sharon.hawks@duke.edu

Bernadette Henrichs, PhD, CRNA, CCRN
Professor and Director
Nurse Anesthesia Program
Goldfarb School of Nursing at Barnes-Jewish College
MS: 90-36-697
4483 Duncan Ave
St. Louis, Missouri 63110
(314) 454-8910 (voice – BJC); (314) 362-4870 (Fax)
(314) 253-0210 (Pager)
314-362-2334 (Office -Anes Dept): / 362-1185 (Fax – Anes Dept)
Email Address: BHenrichs@bjc.org

Donna M. Jasinski, PhD, CRNA
Nurse Anesthesia Program Director
Georgetown University School of Nursing and Health Studies
3700 Reservoir Road, NW, Box 571107
Washington, DC 20057-1107
(202) 687-4612 (office) / 202-687-2323 (fax)
Email Address: jasinskd@georgetown.edu

Iván J. Molina, CRNA, MS

Project Director
Interamerican University of Puerto Rico, Arecibo Campus
PO Box 36255
San Juan, Puerto Rico 00963-3255
(787) 878-5475, ext. 3502 (office)
Email Address: imolina@arecibo.inter.edu

9.   Explanation of any Payment/Gift to Respondents
There are no decisions to provide payments or gifts to the respondents.

10. Assurance of Confidentiality Provided to Respondents
The Privacy Act of 1974 (5 U.S.C. 522a) is not applicable to this request, as this information collection will not obtain confidential information on individuals.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature, such as sexual behavior and attitudes, alcohol or drug use, religious beliefs, and other matters that are commonly considered private.   The data collection does not request Social Security Numbers or Personal Identifiable Information on the enrollees / trainees or graduates.

12. Estimates of Annualized Hour and Cost Burden

The estimated annualized burden for the proposed data collection activities varies by applicant organization providing the required information. The table below summarizes the total burden hours for this information collection.

12A.   Estimated Annualized Burden Hours

	Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
12B	Applicant	Table 1 - NAT: Enrollment, Traineeship Support, Graduate, Graduates Supported and Projected Data	100	1	3.67	367
	Applicant	Table 2A – NAT: Graduate Data – Rural, Underserved, or Public Health (7/01/XX – 6/30/XX)	100	1	2.13	213
	Applicant	Table 2B – NAT: Graduates Supported by Traineeships Data – Rural, Underserved, or Public Health (7/01/XX-6/30/XX)	100	1	1.94	194
	Total		100	1	7.74	774

Based on the estimated total number of burden hours, it is estimated that the annualized cost to respondents is approximately $16,439.76. This result was obtained by multiplying the number of burden hours by the average hourly wage rate of an individual employed in an academic setting. (Note: wage rates were obtained from the United States Department of Labor http://www.bls.gov/bls/blswage.htm. Average Hourly Rate for this labor category is $21.24). Data collection and reporting activities are a grant requirement authorized under 45 CFR Part 74.

Estimated Annualized Cost to Respondents

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs

| Applicant | 774 | $21.24 | $16,439.76 |
| Total | 774 | $21.24 | $16,439.76 |

13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

There is no capital or cost of maintaining capital associated with this information collection. Applicant institutions already collect and maintain the required information such as number and characteristics of enrollees, graduates, students supported, and the types and characteristics of programs from which trainees are enrolling, receiving traineeship support and/or graduating.

14. Annualized Cost to Federal Government

The systems used to collect information for the applications is maintained at each applicant organization and maintained in the HRSA EHBs system when submitted to this Federal agency. It is estimated that approximately 2 to 6 personnel will complete the application.

This is estimated at 1.5 FTE at the GS-13, step 5 level of $81,230 (base salary). Collectively, the estimated annualized cost to the government in staff time is estimated to be $121,845.

15. Explanation for Program Changes or Adjustments

This is a new data collection.

16. Plans for Tabulation, Publication, and Project Time Schedule

This information collection will be published in the Funding Opportunity Announcement which will be on the Internet, Grants.gov and the HRSA EHBs. The OMB approval is needed for the electronic system and to collect the data. Clearance is requested for the maximum 3 years.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

The Office of Management and Budget Expiration Date for the NAT Tables will be displayed. No exemption is being requested.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.