**National Institute of Food and Agriculture**

**U.S. Department of Agriculture**

**OMB No. 0524-0047**

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

SUBJECT: Supporting Statement for Paperwork Reduction Act Submission for the Application Package 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 collected 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 collected 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 an annual basis, typically in late April. 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 compose 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*. Submission of applications is only accepted by mail.

4. EFFORTS TO IDENTIFY DUPLICATION

This is the first and only 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 because the information collected by individually.

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 application period. 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 April 16, 2014 (74 FR 21435). NIFA did not receive any comments.

CONSULTATIONS WITH PERSONS OUTSIDE THE AGENCY

NIFA did not consult with any persons outside the agency.

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

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 $46,875 ($31.25 x 1,500). 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 $17,307 ($38.46 x 450).

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Type of Respondent  and Form | Number of Respondents | Estimated number of responses per respondent | Average burden hours per response | Annual  burden hours requested |
| *Applicants:*  Applicant Information  Personal Statement  List of Recommenders  Loan Information  Contract  Certification for Applications  Intent of Employment | 100  100  100  100  100  100  100 | 1  1  1  2  1  1  1 | 1  6  .5  .5  .25  .25  1 | 100  600  50  100  25  25  100 |
| Applicants subtotal | 100 | --- | --- | 1,000 |
| *Recommenders:*  Recommendation | 300 | 1 | 1 | 300 |
| Recommenders subtotal: | 300 | 1 | 1 | 300 |
| *Financial Institutions:*  Loan Information | 200 | 1 | .25 | 50 |
| Financial Institutions subtotal: | 200 | 1 | .25 | 50 |
| Grand Total: | 600 | --- | --- | 1,350 |

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

The 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 | $8,412 |
| Program Manager, GS-15 | Evaluates applications, coordinates panel members, announces awards | $67.21 | 6 hours | $403.26 | $60,489 |
| **TOTALS** | | | 8 hours | $459.34 | $68,901 |

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

15. REASONS FOR CHANGE IN BURDEN

There is an adjustment decrease in the number of respondents from 1,260 to 600, the responses decreased from 2,600 to 160 and the burden hours from 2,820 to 1350.  The reason for the decrease is a decrease in the number of applicants, recommenders and financial institutions.

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

1. **7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
2. **\* requiring respondents to report information to the agency more often than quarterly;**

These data would not be needed more than once per year.

Traditionally, there has been a due date of November 1 for more than 30 years. Any changes to the information to be collected are specified by June 1 of each year.

No paper documents are required. Each responding state or territory submits one completed Excel spread sheet.

1. **\* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

There is no federal requirement that 4-H enrollment reports be retained by the responding state or territory for any particular length of time. However, a number of states have published histories of 4-H in their state, so extensive records have been kept by the universities.

1. **\* 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 is not conducted in connection with a statistical survey.

1. **\* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

This information does not require the use of a statistical data classification.

1. **\* 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; or**

No pledge of confidentiality is made by USDA, because only aggregated enrollment data is reported by the states, and no identification of any individuals is made.

1. **\* requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No individual information is collected. No questions of a sensitive or personal nature are included in the 4-H enrollment reporting, other than the race and ethnicity of the enrollee. OMB Standards for the Classification of Federal Data on Race and Ethnicity are followed.