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 and Site Recertification Application, OMB Control Number 0915-0230. Approval for the current site application expires on 10/31/2014. 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 National Health Service Corps (NHSC) of the Bureau of Health Workforce (BHW), Health Resources and Services Administration, is committed to improving the health of the Nation's underserved by uniting communities in need with caring health professionals, and by supporting their efforts to build better systems of care. NHSC-approved sites are health care facilities that provide comprehensive outpatient, ambulatory, primary health care services to populations residing in Health Professional Shortage Areas (HPSAs). Related inpatient services may be provided by NHSC-approved Critical Access Hospitals (CAHs).

The NHSC was established by Congress to eliminate designated HPSAs, which 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 and Recertification Application serves as a mechanism by which sites can be approved and employ primary care clinicians.

In order to become an NHSC-approved site, new sites must submit a Site Application for review and approval. Existing NHSC-approved sites are required to complete a Site Recertification Application in order to maintain their status as an approved site. Both the NHSC Site Application and Site Recertification Application request information on the clinical service site, sponsoring agency, recruitment contact, staffing levels, service users, charges for services, employment policies, and fiscal management capabilities. Assistance in completing these applications may be obtained through the appropriate State Primary Care Offices and the NHSC. The information collected on the applications are used for determining the eligibility of sites for the assignment of NHSC health professionals and to verify the need for NHSC clinicians. Approval as an NHSC service site is valid for 3 years. Sites wishing to remain eligible for the assignment of NHSC providers, must submit a Site Recertification Application every 3 years.

2. <u>Purpose and Use of Information</u>

The need and purpose of this information collection is to obtain information for NHSC Site applicants. The information obtained from the NHSC Site Application and Site Recertification Application will be utilized to determine the eligibility of sites to participate in the NHSC as an approved service site. In addition, the data obtained from the applications will facilitate the process of identifying and communicating the availability of service site positions where clinicians may fulfill their service obligation.

Given that the NHSC Site Application and Recertification Application is a modified version of the previous NHSC Site Application, there are no significant programmatic changes that have occurred. The site application has undergone minor technical changes in an effort to provide clarity and to make the application process more efficient.

3. Use of Improved Information Technology

The NHSC Site Application and Recertification Application is an interactive, online-based application which is fully accessible through the NHSC web site at <u>http://nhsc.hrsa.gov/sites/</u>.

4. Efforts to Avoid Duplication

The NHSC Site Application and Site Recertification Application do not duplicate any other application. These applications are the only known mechanism for collecting site specific information that can be used for determining site eligibility, with exception to data collected through site visits conducted by the NHSC Division of Regional Operations (DRO).

5. Involvement of Small Entities

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 adequately evaluate sites and determine their eligibility to be approved NHSC sites.

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. Consultation Outside the Agency

The notice required by 5 CFR 1320.8(d) was published in the *Federal Register* on May 1, 2014 (Vol. 79, No. 84, pages 24737-24738). No comments were received. The following respondents reviewed the application for burden, comprehension, and format, in April or 2014:

Goodland Family Health Center 106 Willow Road Goodland, KS 67735 (785) 890-6075

Community Health Associates – Yuma 2851 South Ave. B, Bldg. 29A, Suite 2902 Yuma, AZ 85364 (928) 304-7729

Sackets Harbor Family Health Center 105 Barracks Drive Sackets Harbor, NY 13685 (315) 646-7119

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.

Hour and Cost Estimates

Form Name	Number of Respondents	Number of Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours	Wage Rate	Total Hour Cost
NHSC New Site Application	2,000	1	2,000	0.5	1,000	\$20	\$20,000
NHSC Site Recertification Application	1,000	1	1,000	0.5	500	\$20	\$10,000
Total	3,000		3,000		1,500		\$30, 000

The estimates contained in the table above reflect a total annual number of 3,000 applicants (2,000 for new applications per year and 1,000 for recertification applications per year). The information requested takes approximately 30 minutes to complete by a site administrator or designated site official. Given that the wage rate may vary among site officials based on their career level and experience, it is estimated that a site official would be making \$20 per hour (12.49 + 13.21 + 16.78 + 38 = 80.48/4 = 20.12). The approximate wage rates were determined by data from the Bureau of Labor Statistics' (BLS) Occupational Outlook Handbook (<u>http://www.bls.gov/ooh/</u>) for entry level, mid-level and senior level health care administrative support personnel and/or managers. As such, the total burden hours and total hour cost would be 1,500 and \$30,000 respectively.

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

Instrument	GS-Level/Base Pay Rate	Project Time per FTE	Number of FTEs	Total Annual Cost
NHSC Site Application and Site Recertification Application	\$75,621 (GS-12, Step 1)	.025	41	\$77,512

Both the NHSC Site Application and Site Recertification Applications are reviewed and processed internally by DRO staff with an average pay rate of \$75,621 (equivalent to a GS-12, Step 1 at 2014 pay rate level). A reorganization of the former NHSC Sites Branch, which merged with DRO, took place within the Bureau, causing a re-distribution of application

processing responsibilities, and resulted in a significant increase in FTEs, growing from 5 to 41 individuals. Therefore, both the project time spent on the processing activity increased and resulted in an increase of the total annual cost to the government from \$37, 436 to \$77,512. It is estimated that the annualized total cost to the government will be \$77,512.

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

There are no changes to the estimate of burden. The current burden for this activity in the OMB inventory of approved collections is for 3,000 respondents with 1,500 total burden hours, and it remains the same. However, there is an adjustment in the actual distribution of responses and hours, to account for both the new Site Applications and the Recertification Applications (which are both generated through the Bureau's Management Information System Solution (BMISS) system.

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

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

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.