Health Resources and Services Administration

National Health Service Corps Loan Repayment Program

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Circumstances of Information Collection

This is a request for Office of Management and Budget (OMB) approval for a revision of the application for the 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 Authorization for Disclosure of Loan Information form, the Privacy Act Release Authorization form, the Verification of Disadvantaged Background form, and the Private Practice Option form) is 0915-0127, which expires on January 31, 2014.

The NHSC LRP is administered by the Bureau of Clinician Recruitment and Service (BCRS) in the Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services (HHS). Under the NHSC LRP, HHS enters into contracts with selected primary care health professionals who agree to provide culturally competent, interdisciplinary primary health care services to underserved populations located in selected Health Professional Shortage Areas (HPSAs) identified by the Secretary of HHS. In return, the NHSC LRP assists clinicians in their repayment of outstanding qualifying educational loans. The NHSC agrees to repay up to \$60,000 for an initial 2 years of full-time clinical service or for an initial 4 years of half-time clinical service.

2. Purpose and Use of Information

The purpose of the online application is to obtain information from an applicant that is used to consider an applicant for a NHSC LRP contract award. Applicants must submit an application to the NHSC 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, applicants must enter in information regarding the loans for which repayment is being requested. The information the applicant is requested to complete identifies past and present lenders, the purpose of the loan, original date and amount of the loan, current balance and interest rate, and default status. With exception to the Authorization for Disclosure of Loan Information form, the Privacy Act Release Authorization form, the Verification of Disadvantaged Background form, and the Private Practice Option form, all of the information requested from applicants is completed through the online application. The application package was revised to include many of the previous paper forms required with the application, in an effort to reduce the burden for applicants, and to create a more efficient application process.

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.

3. <u>Use of Improved Information Technology</u>

This information collection activity is fully web-based (with exception to some forms as previously mentioned). The application, application instructions and program information are available on the NHSC web site at: http://nhsc.hrsa.gov/loanrepayment/index.html.

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 NHSC entering into a contract for repayment of a clinician's 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 last notice required in 5 CFR 1320.8(d) was published in the *Federal Register* on September 5, 2013, Vol.78, No. 172, page 54661. One comment was received inquiring about the application cycle and release date.

The program has surveyed the following applicants to obtain constructive feedback to improve the application, improve efficiency, and minimize the collection burden. There were no suggestions for changes or revisions.

The individuals contacted were former NHSC program participants. Their contact information is as follows:

Kara Lampasone Public Health Analyst 13 Lakenheath Ct. Potomac, MD 20854 (512) 921-9012

Adam Tahiru Public Health Analyst 12614 Stratford Garden Dr. Silver Spring, MD 20904 (760) 562-2520

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" (0915-0037). 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 an individual 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 relevant financial information collected through this application package complies with this requirement.

11. Questions of a Sensitive Nature

There are no questions of a sensitive nature.

12. Estimates of Annualized Hour Burden

The estimates of reporting burden are as follows:

Instrument	Number of Respondents	Responses per Respondent	Total Responses	Hours per Response	Total Burden Hours	Hour Cost	Total Hour Cost
NHSC LRP Application	8,200	1	8,200	1.0	8,200	\$20	\$164,000
Authorization for Disclosure of Loan Information Form	150	1	150	.10	15	\$20	\$300
Privacy Act Release Authorization Form	100	1	100	.10	10	\$20	\$200
Verification of Disadvantaged Background Form	600	1	600	.50	300	\$20	\$6,000
Private Practice Option Form	300	1	300	.10	30	\$20	\$600
Total			9,350		8,555		\$171,100

The program estimates that the number of applicants/respondents will average approximately 8,200 per year for the next 3 years. Each applicant must complete an online 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. Information from different applicants may vary, however it appears that the burden estimates for the forms remain reasonable based on consultation with previous respondents.

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

Instrument	Base Pay Rate	Project Time per FTE	Number of FTEs	Total Annual Cost
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NHSC Loan Repayment Program Application	\$74,872/GS-12	1.0	6	\$449,232
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The processing of the NHSC LRP application and forms are handled internally, through BCRS' Application and Processing Unit (APU). The variables used to estimate the annualized cost to the government are contained in the table above. There are 6 FTEs involved in the processing of the applications. It is estimated that a base pay rate of \$74,872 (equivalent to a GS-12) per individual will be received in exchange for a full-time commitment (approximately 100% of the individual's work time) on this project. The total estimated annual cost to the Government is \$449,232.

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

The estimated total burden hours for this activity are 8,555 hours. This substantial decrease in burden hours (a difference of 3,573 hours) accounts for the streamlined application. The current online application incorporates a majority of the supporting and supplemental documents, thereby significantly reducing the number of burden hours spent by respondents. The modified application also lowers the number of responses needed from respondents, from 41,225 to 9,350 responses. Additionally, it is important to note that some of the forms may not be applicable and/or required by all participants. For example, the Private Practice Option is one such form that is only completed by those participants interested in exercising this particular service option. As a result, these form adjustments serve as another factor impacting the number of responses and burden hours for this activity.

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).