

National Institute of Food and Agriculture
U.S. Department of Agriculture
OMB No. 0524-XXXX
Veterinary Medicine Loan Repayment Program

1SUBJECT: Supporting Statement A for Paperwork Reduction Act Submission for all records, forms and reporting requirements associated with the Veterinary Loan Repayment Program (VMLRP)

A. JUSTIFICATION

1. CIRCUMSTANCES MAKING COLLECTION OF INFORMATION NECESSARY

This information collection merges two previously approved information collections, OMB control number 0524-0046 and OMB control number 0524-0047, and adds new reporting and record keeping requirements, feedback surveys and a post-contract survey. When the Office of Management and Budget (OMB) approves this collection 0524-0046 and 0524-0047 will be discontinued.

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 National Institute of Food and Agriculture (NIFA) will designate geographic and practice areas that have a shortage of food supply veterinarians in order to carry out the VMLRP goals of strengthening the nation's animal health infrastructure and supplementing the Federal response during animal health emergencies. NIFA will carry out NVMSA by entering into educational loan repayment agreements with veterinarians who agree to provide veterinary services in veterinarian shortage situations for a determined period of time.

Before NIFA educational loan repayment agreements can be issued, certain nomination information is required from State Animal Health Officials. This information is obtained via a VMLRP Veterinarian Shortage Situation Nomination Form. Because the nominations submitted are reviewed by a merit panel, it is particularly important that the information be provided in a standardized fashion to ensure equitable treatment for all nominations.

After shortage situations are designated the VMLRP must request information from applicants 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 for collection 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.

Once veterinarians are selected for participation in the VMLRP and enter into an educational loan repayment agreement with NIFA a service log must be maintained by the participant. The participant and/or their employer must report service and payment information to the VMLRP for oversight of the agreement. This information must be provided in a standardized fashion to ensure equitable oversight for all participants and for monitoring the program's short-term impacts.

After a participant's contract ends information related to the retention of a veterinarian's services in the shortage situation post-agreement must be collected to assess long-term impacts. This information must be provided in a standardized fashion in order to assess trends over time.

Additionally, information from participants and their employers on program performance and status of the veterinarian shortage situations is needed for program process assessment and improvement. This feedback will provide insights into participant or employer perceptions, experiences and expectations and contribute directly to improvements in program management. This information must be provided in a standardized fashion in order to assess all elements of the program and the relevant need of veterinary services in the shortage situations being served.

2. HOW, BY WHOM, AND PURPOSE FOR WHICH INFORMATION IS TO BE USED

- a. Shortage Situation Nomination (previously approved under 0524-0046) (NIFA 2009-0001). NIFA will publish a solicitation in the *Federal Register* and on the NIFA website for the veterinarian shortage situations on an annual basis. State Animal Health Officials will submit the necessary information to NIFA using the Veterinarian Shortage Situation Nomination form.

NIFA will convene a panel of food supply veterinary medicine experts from Federal and state agencies, as well as institutions receiving Animal Health and Disease Research Program funds under section 1433 of NARETPA, to review the nominations and make recommendations to the NIFA Program Manager. Nominations designated as veterinarian shortage situations are made available via the VMLRP website for applicants to review. The contents of the Veterinarian Shortage Situation Nomination form outlines the services, the location and the species/commodity group or veterinary discipline a VMLRP participant is contracted to provide.

- b. Application (previously approved under 0524-0047) (NIFA Forms 01-10, 02-10, 03-10, 04-10, , 06-10, 07-10, and 08-10), Applications (RFA) in the *Federal Register* and/or on the NIFA website for VMLRP loan repayment applications from individual veterinarians on an annual basis. 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 include food supply veterinary medicine experts from Federal and state agencies, private veterinarians, as well as individuals from institutions receiving Animal Health and Disease Research Program funds under section 1433 of NARETPA, private associations, and other relevant organizations.

The information collected allows the peer review panel to evaluate each applicant's qualifications, career interests, and letters of recommendation and identify the most meritorious applications for repayment of educational indebtedness in return for agreeing to provide veterinary services in veterinarian shortage situations. The information collected is also used by NIFA staff to determine an applicant's eligibility for participation in the VMLRP and to establish their award amount.

- c. Records and Reports (NIFA)5-10, 09-10 previously approved under 0524-0047, other items described are new. When an applicant is offered an award they are provided a contract to sign (NIFA 05-10). The contract outlines the obligations of the participant and NIFA as it relates to service, payments and reporting as well as outlines circumstances of non-compliance or inability to fulfill the contract. An updated contract reflecting new reporting requirements described in this packet as well as language more consistent with current legislation was provided with the packet.

By entering into a loan repayment agreement with NIFA, participants must agree to maintain a service log. At a minimum, the service log for type I and II shortage situations should contain: date of service, duration of service/appointment, windshield/drive time (if being counted for service hours), animal commodity or species served, county and zip code of client/farm receiving services, and services provided. The service log for type III shortage situations should contain, at a minimum: date of service/activity, duration of service/activity, and description of service/activity conducted to include role. This log is subject to a random service audit to verify that services provided are consistent with requirements of the shortage situation being served. If selected for audit a participant will be notified via email to provide a copy of their service log for the current quarter in a data format e.g. .csv, excel, etc. In the event discrepancies are found the full log may be requested.

The Close-Out report is new and a form was provided with the packet.

Each quarter VMLRP staff send each participant's employer (participant if self-employed) a Service Verification form by email (NIFA -09-10). This is an affidavit signed by the participant's employer (participant if self-employed) certifying that the participant is still employed by them and provided the services as required by the terms and conditions of their contract. Payment is issued upon receipt of this form and participants send a copy of their loan statement or screen shot from the lending institution that includes their name, date statement generated, posting date of payment, payment amount, current balance or payoff amount, and loan type as payment verification.

During the last quarter of the contract period VMLRP staff provide participants with a close-out report form (VMLRP_CloseOut Report) to return by the end of their contract period in order to receive their final loan payment. Responses submitted in this report is subject to reporting as aggregate data as a new section in the program's annual report or as requested by stakeholders and Congress. Additionally, any specific information relevant to the status of the shortage situation will be provided to State Animal Health Officials to aide them during the nomination process.

The information collected enables VMLRP staff to provide program oversight ensuring that participants are providing services as outlined in the Veterinarian Shortage Situation form for the shortage situation contracted to serve and that federal funds are being distributed properly. Additionally, the close-out report enables the VMLRP to evaluate program impacts and projected outcomes.

- d. Surveys. Survey participation is voluntary and is not tied to a participant's service contract. All surveys will be provided as a link to a web-based survey system or provided as a PDF-fillable form attached to an email. Participants will receive a Feedback Survey after the first year of their contract. Employers will receive an Employer Feedback Survey at the end of the participant's contract period as the survey requests information on the participant's impact on the shortage situation during the contract period. Past participants will receive a Post-Award Termination Survey one, three and five years after contract period end date. (VMLRP_Employer Survey, VMLRP_Feedback Survey, VMLRP_Post award Survey)

The information collected will allow the VMLRP to assess program processes and impact, make program improvements based on process feedback, and provide feedback to State Animal Health Officials on veterinarian shortage situations which can aide them during the nomination process.

All information submitted to the VMLRP is subject to reporting as aggregate data in the program's annual report (except responses to the feedback survey) or as requested by stakeholders and Congress.

3. USE OF IMPROVED INFORMATION TECHNOLOGIES

- a. Shortage Situation Nomination. NIFA will provide this form on its website in PDF-fillable format when the solicitation for VMLRP Veterinarian Shortage Situations is published in the *Federal Register*. Submissions are accepted via a dedicated mailbox, vmlrp.applications@nifa.usda.gov.
- b. Application. NIFA will provide this form on its website in PDF-fillable format and/or as a Microsoft Word document when the Request for Applications for VMLRP awards is published in the *Federal Register*. Submissions are accepted by mail or private courier.
- c. Records and Reports. Service logs may be maintained in any data format e.g. .csv, xls, etc. Each service quarter VMLRP staff will send the Service Verification form in PDF-fillable format to each participant's employer (participant if self-employed) to certify and sign. At this time any participants selected for audit will be notified to send the service log for the quarter of service being verified to the VMLRP office. Service logs and Close-out Reports are accepted via a dedicated mailbox, vmlrp@nifa.usda.gov. Service Verification forms and payment verifications (copy/receipt of posted loan payment) are accepted via fax or a dedicated mailbox, vmlrp@nifa.usda.gov

During the final quarter of service a Close-out Report form (VMLRP_CloseOut Report) will be provided as a link to a web-based survey system (e.g., Survey Monkey) or provided as a PDF-fillable form attached to an email. Depending on the platform used submissions will be accepted via download from the online survey tool or via a dedicated mailbox vmlrp@nifa.usda.gov.

Surveys. Survey forms will be provided as a link to a web-based survey system or provided as a PDF-fillable form attached to an email. Depending on the platform used submissions are accepted via download from the online survey tool or via a dedicated mailbox vmlrp@nifa.usda.gov.

4. EFFORTS TO IDENTIFY DUPLICATION

This is the first and only loan repayment program administered by 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 VMLRP.

5. METHODS TO MINIMIZE BUDGET OF SMALL BUSINESSES OR ENTITIES

Small Businesses are not impacted by this information collection.

6. CONSEQUENCE IF INFORMATION COLLECTION WERE LESS FREQUENT

- a. Shortage Situation Nomination. State Animal Health Officials submit VMLRP Veterinarian Shortage Situation Nomination forms for designated veterinarian shortage situations only when requested by NIFA, usually on an annual basis. However, NIFA reserves the right to solicit veterinarian shortage situations every two or three years, as appropriate. The submission of information must be timely in order to receive nominations in NIFA, properly screen nominations, and carry out the evaluation process.
- b. Application. 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 carry out the review process.
- c. Records and Reporting. Participants must maintain a service log that can be presented to their employer if needed to certify service or to VMLRP when requested for a service audit. Periodically

individuals will be randomly chosen for audit and should anticipate one audit during their service contract. Without the service log VMLRP staff are unable to verify that services provided by a participant are consistent with the terms and conditions of the contract.

On a quarterly basis a participant's employer (participant if self-employed) will submit the Service Verification form affirming employment and service under the terms and conditions of the VMLRP contract. Upon receipt of loan payment, participants will provide verification that funds were received by their lending institution. Quarterly certification of services provided ensures that government funds are distributed for contracted services. Corresponding payment verification ensures that government funds are received by the correct lending institution for the correct participant. Obtaining this information any less frequently could result in delayed payments, increased financial burden on the participant due to compounded interest, and delayed identification of contract breaches after release of government funds.

The close-out report is provided at the end of the service contract. If the data is not collected the VMLRP program will not be able to highlight services provided by participants, describe the impact the program is having on shortage situations in the short-term, assess the potential retention of a participant's services for the shortage situation, or provide this information to Members of Congress, USDA, and stakeholders.

- d. Surveys. The feedback surveys (both employer and participant) will only be provided once during the service contract. These voluntary surveys are appropriate vehicles to examine participant and employer satisfaction with the program, respond in a timely manner to their needs, and provide information for determining future shortage situations to State Animal Health Officials.

The post-award termination survey is provided one, three and five years post-service contract. These time intervals were selected based on the Bureau of Labor's statistic that the average American job tenure is 4.7 years and reports that around half of food animal veterinarians leave food animal practice in the first five years. Obtaining responses at these intervals will enable the program to approximate if and when participants make employment or service changes. Longer intervals would increase recall bias associated with the reasons for retention and increase the chance that a participant would be lost for follow-up.

7. SPECIAL CIRCUMSTANCES FOR INFORMATION COLLECTION

- **Requiring respondents to report information to the agency more often than quarterly:**

Program participants 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. 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 remedies as outlined in Section C, Paragraph 2 of the contract.

All other information requests may be conducted on a situational basis.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt:**

VMLRP does not require a written response to a collection of information in fewer than 30 days.

- **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:**

The information collected in association with the surveys will be voluntary. Feedback surveys will not be used for statistical purposes. Statement B is provided.

- **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 December 29, 2015. NIFA received one comment.

CONSULTATIONS WITH PERSONS OUTSIDE THE AGENCY

NIFA solicited stakeholder input at a public meeting on Monday, September 15, 2008, and through written comments. Results of an external review of the program, conducted December 1-2, 2015,

support the proposed requirements for records and reporting as well as the proposed use of feedback and post-award termination surveys. Additionally, seven current and past participants were asked to review and provide estimates of time needed to complete the record keeping requirement, close-out report and surveys.

NIFA sought consultation outside the agency with the following individuals:

Annie Bowes, DVM
Aspen Veterinary Service
3046 East Seltice Way
Post Falls, Idaho 83854
(208) 659-6825 (phone)

N. Jo Chapman, DVM MPH
Assistant Chief
Animal Health Program
Maryland Department of Agriculture
0 Harry S. Truman Parkway
Annapolis, MD 21401
(410) 841-5810 (phone)

Margaret A. Highland, DVM, PhD, Dipl. ACVP
Animal Disease Research Unit, ARS-USDA
Washington State University
ADBF 3033
Pullman WA 99164
509-335-6327 (phone)

Brian V. Lubbers, DVM, PhD, DACVCP
Director, Clinical Microbiology & Microbial Surveillance Laboratories
Kansas State Veterinary Diagnostic Laboratory
1800 Denison Ave.
Manhattan, KS 66506
85-532-4012 (phone)

Robert Reid, DVM
Reid Veterinary Service
P.O. Box 64
Crawford, NE 69339
308-430-0460 (phone)

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

The agency does not provide payment or gifts 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. A Veterinarian Medicine Loan Repayment (VMLRP) System of Records Notification (SORN) appeared in the *Federal Register* on December 13, 2010.

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) Evaluate applicants and select participants 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.

None of the information maintained in the service log or requested on the VMLRP Veterinarian Shortage Situation Nomination Form, Feedback Survey, Close-Out Report, Employer Survey, and Post-Award Termination Survey is of a sensitive nature.

12. ESTIMATE OF BURDEN

- a. Shortage Nomination. It is estimated that completion of this form, which includes checkboxes and text-limiting fields to minimize the overall burden, will take approximately two hours.
- b. Application. 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. All of these forms are PDF-fillable with checkboxes and text-limiting fields to minimize the overall burden.
- c. Records and Reports. For each participant a service log must be maintained, a Service Verification form must be completed on a quarterly basis, and a Close-Out Report must be provided at the completion of the service agreement. It is estimated that it will take approximately fifteen minutes to record each day’s services, approximately fifteen minutes to complete the Service Verification form, and approximately twenty minutes to complete the Close-Out Report.
- d. Surveys. It is estimated that it will take each participant approximately twenty minutes to complete the Feedback Survey, each employer approximately fifteen minutes to complete the Employer Survey and each past participant approximately fifteen minutes to complete the Post-Award Termination Survey.

ANNUALIZED COSTS TO RESPONDENTS

Type of Respondent	Total Hours	Hourly wage ¹	Total Cost Burden
<i>State Animal Health Officials</i>	480	\$40.04	\$19,219
<i>Applicants</i>	1,500	\$42.11	\$63,165
<i>Recommenders</i>	450	\$42.11	\$18,950
<i>Current Participants</i>	9,843	\$42.11	\$414,489
<i>Employers</i>	97.5	\$42.11	\$4,106
<i>Past Participants</i>	37.5	\$42.11	\$1,579
Grand Total:	11,978	---	\$521,508

¹All salaries were obtained from Bureau of Labor Statistics), median wage used unless a mean specifically posted for the position (<http://www.bls.gov/oes/current/oes291131.htm>)

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Type of Respondent and Form	No. of Respondents	Annual Frequency per Response	Total Annual Responses	Hours per Response	Total Hours
<i>State Animal Health Officials:</i>					
VMLRP Veterinarian Shortage Situation Nomination	60	4	240	2	480
Animal Health Officials subtotal	60	---	240	---	480
<i>Applicants:</i>					
Applicant Information	150	1	150	1	150
Personal Statement	150	1	150	6	900
List of Recommenders	150	1	150	.5	75
Loan Information	150	2	300	.25	150
Contract	150	1	150	.25	37.5
Certification for Applications	150	1	150	.25	37.5
Intent of Employment	150	1	150	1	150
Applicants subtotal	150	---	750	---	1,500
<i>Recommenders:</i>					
Recommendation	450	1	450	1	450
Recommenders subtotal:	450	---	450	---	450
<i>Financial Institutions:</i>					
Loan Information	200	1	200	.25	50
Financial Institutions subtotal:	200	---	200	---	50
<i>Current Participants:</i>					
Service Log	150	260	39,000	.25	9750
Service Verification ¹	60	4	240	.25	60
Feedback Survey	50	1	50	.33	16.5
Close-out Report	50	1	50	.33	16.5
Current Participant subtotal:	150	---	39,340	---	9843
<i>Employers:</i>					
Service Verification ¹	90	4	360	.25	90
Employer Survey	30	1	30	.25	7.5
Employer subtotal:	90	---	390	---	97.5
<i>Past Participants:</i>					
Post-Award Termination Survey	150 ²	1	150	.25	37.5
Past Participant subtotal	150	---	150	---	37.5
Grand Total:	1190	---	41,280	---	11,979

Service verification can be provided by an employer or the participant if self-employed. Typically 1/3 of VMLRP participants are self-employed.

² Assumes a 100% response rate.

13. CAPITAL/STARTUP COSTS

There are no capital or startup costs for this activity.

14. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

1The staff members responsible for administering the VMLRP are full-time employees ranging in grade levels GS-9 to GS-13. Processing of VMLRP forms and data associated with these forms is included in their regularly assigned duties.

Staff	Action	Annual Salary*	%FTE for Program	Total Annualized Cost
Program Assistant, GS-9	Processes applications for preliminary review, assists with data entry	\$52,668	10	\$5,267
Program Analyst, GS-11	Assess loan eligibility, processes payments and reviews payment verifications	\$63,722	60	\$38,233
Program Specialist, GS-12	Reviews applications for administrative compliance, coordinates panel meetings, distributes and collects surveys, assists with data analysis and reports	\$76,378	35	\$26,732
Policy Analyst, GS-13	Assesses loan eligibility, sends service verification forms, tracks receipt of verification	\$90,823	35	\$31,788
Program Coordinator, GS-13	Evaluates applications, coordinates panel members, announces awards, audits service, analyzes data and develops reports	\$90,823	60	\$54,494
TOTALS			2 FTEs	\$156,514

*GS step 1 was used in determining the hourly pay for each grade level.

15. REASONS FOR CHANGE IN BURDEN

This is a new submission merging two previously approved information collections (IC 0524-0046 and IC 0524-0047). As a result of merging the two collections and the additional information (Records and Reports, and Surveys) this resulted in a program change of 1,190 respondents, 41,280 responses, and 11,979 burden hours.

16. TABULATION, ANALYSIS AND PUBLICATION PLANS

All information submitted to VMLRP is subject to reporting as aggregate data in the program's annual report which is posted on the NIFA website, <http://nifa.usda.gov/vmlrp-reports-and-statistics>.

17. SEEKING APPROVAL TO NOT DISPLAY OMB APPROVAL DATE ON FORMS

All VMLRP forms will display the OMB approval date.

18. EXCEPTION(S) TO THE CERTIFICATION STATEMENT

USDA claims no exceptions to the certification statement