Supporting Statement A

Nurse Faculty Loan Program (NFLP) – Program Specific Data Form

OMB Control No. 0915-0378

Highlighted text is the information changed from the last request.

Terms of Clearance: None

A. Justification

1. <u>Circumstances Making the Collection of Information Necessary</u>

The Health Resources and Services Administration's (HRSA) Bureau of Health Workforce (BHW) requests the Office of Management and Budget (OMB) approval of the Nurse Faculty Loan Program (NFLP) Program Specific Data Form with revisions. The current approval (OMB #0915-0378) expires on April 30, 2017. HRSA is streamlining the data collection forms by making the following revisions:
- Line Item D will be renamed "D1. NFLP Loan Fund Balance/Unused Accumulation."
- Addition of Line Item D2 entitled "NFLP Loan Fund Default Rate," requesting information regarding the status of an institution's default rate.
- Addition of Line Item D3 entitled "Last NFLP Student Loan Award" requesting information regarding the disbursement of NFLP loan funds within the last two academic years.
- Line Item E2 Column Header will be renamed "E.2 NFLP Enrollees Information by Degree - New Students Expected to Request NFLP Support."
- Under Section B of instructions, "other attachments" will be updated to reflect the current list of NFLP Funding Opportunity Announcement attachments.

The NFLP-Program Specific Data Form is used to collect the data required to make award determinations for eligible applicants. The data provided in the form is essential for the formula-based criteria used to determine the award amount to the applicant schools. Continued approval of the revised NFLP – Program Specific Data Form will allow HRSA to more efficiently capture data to generate the formula-based award. Specifically, addition of Line Item D2, NFLP Loan Fund Default Rate, will allow HRSA to easily assess and consider an existing performance standard for those applicants with existing NFLP loan accounts. Used in combination with an existing NFLP institution's self-reported NFLP loan balance, addition of Line Item D3, Last NFLP Student Loan Award, will allow HRSA to assess the loan fund activity (*i.e.,* incidence of loans to students) of an existing NFLP institution applying for additional funding. This data collection enables an efficient award determination process, and facilitates reporting on the use of funds and analysis of program outcomes.

Legislative Purpose
The NFLP is authorized under Title VIII of the Public Health Service Act, Section 846A (42 U.S.C. 297n-1) to increase the number of qualified nurse faculty. The Secretary of HHS, acting

through HRSA, may enter into an agreement with schools of nursing and make an award to establish and operate a distinct NFLP loan fund. The NFLP loan fund is used by the applicant school of nursing to make loans to eligible students pursuing an advanced nursing degree. This program will prepare students to become qualified as nursing faculty. In fiscal year 2016, the NFLP appropriation was approximately $26.5 million.

Under the NFLP, HHS makes an award to the institution in the form of a Federal Capital Contribution (FCC). The institution uses the FCC to establish a distinct account called the NFLP fund. The School must contribute an Institutional Capital Contribution (ICC) to the NFLP fund equal to at least one-ninth (minimum) of the FCC award. The School has the option of contributing a larger share to the NFLP fund. The NFLP fund may only be used: (1) for the deposit of the FCC and ICC; (2) to make loans to continuing and new NFLP student borrowers enrolled full-time or part-time in a master's or doctoral nursing degree program; (3) for the deposit of collections of principal and interest on loans made from the NFLP fund and any other earnings of the fund; and (4) for the cost of collection of NFLP loans.

2.   Purpose and Use of Information Collection

The automated NFLP-Program Specific Data Form facilitates the capability to streamline the application submission process, enable an efficient award determination process, and serve as a data repository to facilitate reporting on the use of funds and analysis of program outcomes. Additionally, the data is used to ensure programmatic compliance with the legislative authority and program guidance and to formulate and justify the appropriation to OMB and Congress.

The NFLP-Program Specific Data Form captures program-related information provided by the applicant. NFLP applicants complete and submit the NFLP-Program Specific Data Form as an electronic attachment with the required application materials. The form provides the Federal Government with specific data from the applicant which include: (1) the amount of the Federal funds requested by the applicant, (2) the expected contribution from the applicant, (3) the student enrollment and graduation data based on current and prospective NFLP loan recipients, (4) the graduate nursing education programs supported under NFLP, (5) the program accreditation status, (6) the current tuition and fee information for graduate nursing education programs, and (7) the projected NFLP loan fund balance that may be considered as part of the award determination. The data provided in the NFLP-Program Specific Data Form are essential for the formula-based criteria used to determine the award amount to the applicant schools.

3.   Use of Improved Information Technology and Burden Reduction

The NFLP-Program Specific Data Form was implemented within the HRSA Electronic Handbooks (EHBs) in fiscal year 2009. The data form is accessible via the web. NFLP applicants may access an online copy of the data form through the EHBs that is included as part of the online NFLP application package. The online form considerably streamlines the application submission process and reduces the burden to the respondents.

4.   Efforts to Identify Duplication and Use of Similar Information

The information requested in the form is specific to the applicant and unique to this program. The information requested is not available from any other source.

5.   Impact on Small Businesses or Other Small Entities

The data collection does not involve small businesses or other small entities.

6.   Consequences of Collecting the Information Less Frequently

The process for making NFLP awards occurs annually, prior to the academic school year. In the absence of collecting these data, the review, selection and approval of funding for qualified applicants cannot be carried out.

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

This information collection is consistent with 5 CFR 1320.5(d)(2), except for 5 CFR 1320.5(d)(2)(v) through (viii); there are no special circumstances with respect to: 1) use of statistical data classifications, 2) pledge of confidentiality not supported by statute or regulation or required proprietary, and 3) trade secret, or other confidential information not protected by agency procedures.

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

A 60-day Federal Register Notice was published in the *Federal Register* on February 21, 2017, Vol. 82, No. 33, pg. 11229-30 (https://www.gpo.gov/fdsys/pkg/FR-2017-02-21/pdf/2017-03339.pdf).   One public comment was received.

In regards to the comments, please see our response below:

(1) the necessity and utility of the proposed information collection for the proper performance of the agency's functions:

It is imperative that the agency must maintain accurate collection of data to identify the proper performance of the agency's function. I agree that a form should be utilized to keep track on what is borrowed, disbursements, and borrower account data related to employment status, loan cancellation, loan repayment, and collections. Regardless of the established policy, school should be providing HRSA with current data on the amount of loans received, amount of loans requested, cancelled loans, amount of loans in repayment, defaults percentage, and the amount of nurses that are employed as a nurse faculty. Each school should be submitting the NFLP–APR financial data form to monitor the student/nurse performance to better allow HRSA to monitor and grant more funding to nursing schools.

Response: BHW currently requests much of this information from grantee schools through HRSA's Electronic Handbooks (EHBs), including loan management data, nurse employment data, and borrower information. Continual improvements and programmatic approaches are under consideration to ensure grantee compliance.

(2) the accuracy of the estimated burden:

In my opinion, the accuracy of the estimated burden appears reasonable based on the acquired data. The regulation states that there were 260 respondents, 1 response resulted in 6 hours which in total resulted 1,560 hours. Perhaps a better process or protocol could be put into place to reduce the number of hours of the review process.

Response: As an agency-wide goal, reduction of burden hours is a high priority across all of HRSA's programs. *Burden* means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency, including: (i) reviewing instructions; (ii) developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information; (iii) developing, acquiring, installing, and utilizing technology and systems for the purpose of processing and maintaining information; (iv) developing, acquiring, installing, and utilizing technology and systems for the purpose of disclosing and providing information; (v) adjusting the existing ways to comply with any previously applicable instructions and requirements; (vi) training personnel to be able to respond to a collection of information; (vii) searching data sources; (viii) completing and reviewing the collection of information; and (ix) transmitting, or otherwise disclosing the information. All of these components help BHW to determine overall burden and therefore were factored into the programmatic determination for the NFLP Annual Performance Report Financial as well as the Program Specific Data forms.

(3) ways to enhance the quality, utility, and clarity of the information to be collected:

There are numerous ways to enhance the quality, utility, and clarity of the collected information. First off, financial statements or approved forms from the nursing schools should be sent to HRSA to keep track of each loan granted to student. This should be done every so often to continuously maintain accurate data. Possibly, provide HRSA a list of students who have been granted loans and the amount provided. Also, an electronic program should be implemented for better tracking of loans.

Response: BHW appreciates your feedback on the NFLP Program Specific Data form and will take your comments under advisement. We currently request borrower information, including the amount disbursed to each student, from grantee schools through specified performance reporting periods via HRSA's EHBs annually.

(4) the use of automated collection techniques or other forms of information technology to minimize the information collection burden.

As previously stated, automated collection techniques such as an electronic program would better allow for tracking of each student and each nursing schools loan data. implementing an electronic data system would reduce the information collection burden tremendously because it would be electronically auto-populated. It should be an electronic system that can be both used my HRSA and the Nursing school.

Response: BHW currently utilizes HRSA's EHBs, an electronic data system, to gather information from grantees.

9. Explanation of any Payment/Gift to Respondents

Respondents will not receive any payments or gifts.

10. Assurance of Confidentiality Provided to Respondents

The Privacy Act of 1974 (5 U.S.C. 522a) requires any agency to provide notification to individuals who supply information. The Privacy Act Notification Statement is provided to all NFLP applicants. This statement provides the statutory authority for collecting the information, and describes the purpose of the information collection and the potential disclosure.

11. Justification for Sensitive Questions

The data collection does not request sensitive information from respondents.

12. Estimates of Annualized Hour and Cost Burden

12A. Estimated Annualized Burden Hours

The burden for the revised collection decreased from 1,200 hours to 720 hours, reducing the burden by 480 hours. The decrease in burden is because of a decrease in the total number of respondents, from 150 to 90.

Type of Respondent	Form Name	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
Record-keeper, Accountant	NFLP – Program Specific Data Form	90	1	90	8	720
Total Burden		**90**		**90**		**720**

12B. Estimated Annualized Burden Costs

The application and required information is generally completed by accountant staff at the grantee school. The average hourly salary for an Accountant is $30.51 per hour. This salary amount is based on the 2016 occupational employment for institutions under the Business and Financial Operations category from the Bureau of Labor Statistics site at http://www.bls.gov/oes/current/naics4_611300.htm.

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

Accountant	90	$30.51	$2745.90
Total Costs	**90**	**$30.51**	**$2745.90**

13.   **Estimates of other Total Annual Cost Burden to Respondents or Record-keepers/Capital Costs**

Other than their time, there are no annualized costs to respondents or record-keepers.

14.   **Annualized Cost to Federal Government**

The approximate annualized cost to the government for this data collection effort is $3,168.45. The application data is reviewed and approved by the designated Nurse Consultant (or Project Officer) that monitors the program. The average hourly salary for the position of Nurse Consultant at the GS-13-Step 2 grade level is $46.94 per hour. The Federal hourly salary information is available on the OPM web site at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB_h.pdf.

Form Name	Total Responses	Estimated Review Time	Estimated Hourly Federal Salary	Total Cost Burden
NFLP – Program Specific Data Form	90	0.75	$46.94	$3,168.45
Total Burden	**90**	**0.75**	**$46.94**	**$3,168.45**

15.   **Explanation of Program Changes or Adjustments**

This is not a new activity. HRSA is streamlining the data collection forms by making the following revisions:
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16.   **Plans for Tabulation, Publication and Project Time Schedule**

Clearance is being requested for the maximum allowable time of three (3) years. The deadline for submission of the program specific data is expected to be November of each year. The awards are finalized by July 1st each year. The program specific data will be used for determination of awards to applicants and for analysis of program activity. Statistical methods are not applicable and there are no plans for publication of the data requested.

17.   <u>**Reason(s) Display of OMB Expiration Date is Inappropriate**</u>

The OMB Number and Expiration Date will be displayed on every page of every form/instrument.

18.   <u>**Exception to Certification for Paperwork Reduction Act Submissions**</u>

There are no exceptions to the certification.