

Health Professions Student Loan (HPSL) Program and Nursing Student Loan (NSL) Program  
Administrative Requirements - Regulations and Policy

OMB Control No. 0915-0047

SUPPORTING STATEMENT

**A. Justification**

1. Circumstances Making the Collection of Information

This is a request for approval for a **revision** of the information collections approved under OMB No. 0915-0047 for the administrative regulatory requirements under the Health Professions Student Loan (HPSL) Program and the Nursing Student Loan (NSL) Program. In an effort to consolidate information collection requests and achieve greater programmatic efficiency, HRSA is incorporating the Deferment-HRSA Form 519 and AOR-HRSA Form 501 (OMB No. 0915-0044) into this information collection request. As a result, the OMB No. 0915-0044 package will be discontinued.

*For this package, no changes have been made to the regulatory requirements and the revision consists of the addition of the two forms mentioned above.*

The HPSL Program, authorized by Sections 721-735 of the Public Health Service (PHS) Act (42 USC 292q-292y), provides long-term, low-interest loans to students attending schools of allopathic medicine, osteopathic medicine, dentistry, veterinary medicine, optometry, podiatric medicine, and pharmacy. The NSL Program, authorized by Sections 835-842 of the PHS Act (42 USC 297a-i), provides long-term, low-interest loans to students who attend eligible schools of nursing in programs leading to a diploma in nursing, an associate degree, a baccalaureate degree, or a graduate degree in nursing. Participating HPSL and NSL schools are responsible for determining eligibility of applicants, making loans, and collecting monies owed by borrowers on their outstanding loans. Schools are required to: (1) establish and maintain a revolving fund, (2) invest their HPSL and NSL revolving funds and return earnings from the investments to the HPSL and NSL funds; (3) identify and return to the Department excess cash from the HPSL and NSL funds; and (4) determine the ability to collect defaulted loans and, for loans determined to be uncollectible, either obtain approval to write off the loans or reimburse the fund for the amount that remains uncollected on the defaulted loans. The governing regulations for the HPSL Program are §§ 57.201-57.218 and for the NSL Program are §§ 57.301-57.318.

Approval is requested for the following information collections and regulatory requirements.

RECORDKEEPING REQUIREMENTS

§ 57.206(b)(2) and 57.306(b)(2)(ii), Documentation of Cost of Attendance - In the selection of qualified applicants, the school must document criteria used for determining reasonable costs necessary for the student's attendance at the school.

§ 57.208(a) and 57.308(a), Promissory Note - Each HPSL or NSL loan must be evidenced by a properly executed promissory note in a form approved by the Secretary, and the school must safeguard the note against fire, theft, and tampering.

§ 57.210(b)(1)(i) and 57.310(b)(1)(i), Documentation of Entrance Interview - The school must conduct and document the entrance interview with the borrower prior to disbursing HPSL/NSL funds, to inform him/her of the rights and responsibilities associated with receiving the funds.

§ 57.210(b)(1)(ii) and 57.310(b)(1)(ii), Documentation of Exit Interview - The school must conduct and document the exit interview with the borrower, or if borrower terminates studies without advance notice, the school must document attempts to inform the borrower of the substance of the exit interview and to secure required information from the borrower by mail.

§ 57.215(a) & (d) and 57.315(a)(1) & (a)(4), Program Records - The school must maintain records relating to the operation of its HPSL or NSL funds.

§ 57.215(b) and 57.315(a)(2), Student Records - Approved student applications, documentation of financial need records, and copies of financial aid transcripts must be retained by the school for 5 years after a student ceases to be a full-time student.

§ 57.215(c) and 57.315(a)(3), Repayment Records - Repayment records for each borrower must be retained for at least 5 years from the date of retirement of a loan.

## REPORTING REQUIREMENTS

§ 57.206(a)(2) and 57.306(a)(2), Student Financial Aid Transcript (Disclosure) - An applicant who has previously attended an institution of higher education must submit a financial aid transcript.

§ 57.208(c), Loan Disclosure Requirements (Disclosure) - The school must disclose loan information to students who receive HPSL loans at the onset of their studies and prior to the completion or termination of their studies.

§ 57.210(b)(1)(i) and 57.310(b)(1)(i), Entrance Interview (Disclosure) - The school must conduct the entrance interview with the borrower prior to disbursing HPSL/NSL funds, to inform him/her of the rights and responsibilities associated with receiving the funds.

§ 57.210(b)(1)(ii) and 57.310(b)(1)(ii), Exit Interview (Disclosure) - The school must conduct the exit interview with the borrower, or if borrower terminates studies without advance notice, the school must attempt to inform the borrower of the substance of the exit interview and to secure required information from the borrower by mail.

§ 57.210(b)(1)(iii) and 57.310(b)(1)(iii), Notification of Repayment (Notification) - The school must notify the borrower in writing of the impending repayment obligation at least twice during the grace period.

§ 57.210(b)(1)(iv) and 57.310(b)(1)(iv) - Notification during Deferment (Notification) - The school must notify the borrower in deferment status in writing of the impending repayment obligation 1 to 3 months prior to the expiration of the approved period of deferment.

§ 57.210(b)(1)(vi) and 57.310(b)(1)(vi) - Notification of Delinquent Accounts (Notification) - The school must make at least four attempts to contact the borrower regarding past due payments, prior to the loan becoming 120 days past due.

§ 57.210(b)(1)(x) and 57.310(b)(1)(x) - Credit Bureau Notification (Notification) - The school must become a member of a credit bureau and notify the credit bureau of accounts past due by more than 120 days.

§ 57.210(b)(4)(i) and 57.310(b)(4)(i), Write-off of Uncollectible Loans (Reporting) - If a school wishes to request the Department's approval to write off an uncollectible loan, it must do so within 30 days of determining that the loan is uncollectible.

§ 57.211(a) and 57.311(a), Disability Cancellation (Reporting) - The Secretary will cancel a student borrower's indebtedness if found to be permanently and totally disabled, on recommendation of the school and as supported by whatever medical certification the Secretary may require.

§ 57.312(a)(3), Evidence of Educational Loans (Disclosure) - Borrowers must provide evidence of loans for which they are requesting partial payment for service in a health professional shortage area. Under this regulatory section, there have been no repayment activities reportable for NSL since 1982 when the provision was phased out due to lack of Federal funding.

§ 57.215(a)(2) and § 57.315(a)(1)(ii), Administrative Hearings (Reporting) - A school which fails to comply with reporting requirements relating to the operation of its program, and is therefore subject to termination, may submit a request for formal hearing which contains a statement of material, factual issues in dispute.

§ 57.216a(d) and 57.316a(d), Administrative Hearings (Reporting) - A school which fails to comply with requirements to reduce its default rates may submit a request for formal hearing which contains a statement of material, factual issues in dispute.

## 2. Purpose and Use of Information Collection

These information collections and record keeping requirements are essential for assuring that borrowers are fully informed of the terms and conditions of their loans and are aware of their rights and responsibilities, and that schools know the history and status of each loan account, that they pursue aggressive collection efforts, and maintain adequate records for audit and assessment purposes. The reporting and recordkeeping requirements are to ensure compliance with the authorizing legislation. Schools must maintain adequate records of loan accounts for audit and assessment purposes, and pursue aggressive collection efforts to reduce default rates.

3. Use of Improved Information Technology and Burden Reduction

Schools use automated systems and may select whatever information technology they have available to maintain all records associated with the regulations.

4. Efforts to Identify Duplication and Use of Similar Information

The information requested is unique to the HPSL and NSL program requirements. These requirements will not result in duplication of reporting since schools would not be reporting this kind of information elsewhere.

5. Impact on Small Businesses or Other Small Entities

The information being requested has been held to the absolute minimum required for the intended use of the data.

6. Consequences of Collecting the Information Less Frequently

The information is collected at specified critical intervals of the program and, consequently, could not be collected less frequently without detriment to the success of the program and the financial interest of the Federal Government.

7. Special Circumstances Relating to the Guidelines of- 5 CFR 1320.5(d)(2)

Under P.L. 103-43 the HPSL statute allows for a 10-25 year repayment period at the discretion of the institution (see Sec 134 General Provisions (a)(3)(B)), excluding periods of student status and eligible deferment activities. As a result, student records and repayment records that are part of the loan collections process must be retained for the appropriate repayment period. In addition, the regulations require that student repayment records be retained for 5 years after repayment of the loan.

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

Section 8A: A 60-day Federal Register Notice was published in the Federal Register on November 29, 2017 vol. 82, No. 228; pp. 56619-21. There were/were no public comments.

Section 8B: Program staff contacted the following HPSL and NSL schools. They report no problems and there are no unresolved issues.

### Health Professions Student Loan Contacts

1. Erika Thurman  
Assistant Bursar  
University of Oklahoma Health Sciences Center  
405.271.2433  
[erika-thurman@ouhsc.edu](mailto:erika-thurman@ouhsc.edu)
  
2. Sherry Glover  
Bursar & Director of Student Financial Services  
University of Oklahoma Health Sciences Center  
P.O. Box 26901, SCB 112  
Oklahoma City, Oklahoma 73126  
(405) 271-2433 x46363  
[herry-Glover@ouhsc.edu](mailto:herry-Glover@ouhsc.edu)
  
3. Ruth R. Hoch  
Associate Director  
Student Financial Assistance  
The George Washington University  
2121 I St. NW #301  
Washington DC 20052  
202-994-1577  
[rhoch@gwu.edu](mailto:rhoch@gwu.edu)

### Nursing Student Loan Contacts

1. Carol L. Moyer  
Loan Collection Coordinator  
Baylor University  
One Bear Place #97051  
Waco, TX 76798-7051  
(254) 710-2314  
[Carol\\_Moyer@baylor.edu](mailto:Carol_Moyer@baylor.edu)
  
2. Linda Frenza  
Co-Director of Financial Aid  
Western University of Health Sciences  
309 E. Second St.  
Pomona, CA 92617  
(909) 469-5350  
[lfrenza@westernu.edu](mailto:lfrenza@westernu.edu)
  
3. Erika Thurman  
Assistant Bursar  
University of Oklahoma Health Sciences Center

405.271.2433 x46364  
[erika-thurman@ouhsc.edu](mailto:erika-thurman@ouhsc.edu)

9. Explanation of any Payment/Gift to Respondents

Respondents will not be remunerated.

10. Assurance of Confidentiality Provided to Respondents

Several records systems were established for the HPSL and NSL Programs, which cover the kinds of records maintained by the schools under these regulations. The system numbers are 09-15-0038, and 09-15-0039.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimates of Annualized Hour and Cost Burden

Section 12A: The reporting and recordkeeping burden is as follows:

**RECORDKEEPING REQUIREMENTS**

<b>Regulatory/section requirements</b>	<b>Number of Record keepers</b>	<b>Hours per year</b>	<b>Total Burden Hours</b>
<b>HPSL Program:</b>			
57.206(b)(2), Documentation of Cost of Attendance	432	1.05	454
57.208(a), Promissory Note	432	1.25	540
57.210(b)(1)(i), Documentation of Entrance Interview	432	1.25	540
57.210(b)(1)(ii), Documentation of Exit Interview	475	0.37	176
57.215(a)&(d), Program Records	475	10	4,750
57.215(b), Student Records	475	10	4,750
57.215(c), Repayment Records	475	19.55	9,286
<b>HPSL Subtotal</b>			<b>20,496</b>

<b>Regulatory/section requirements</b>	<b>Number of Record keepers</b>	<b>Hours per year</b>	<b>Total Burden Hours</b>
<b>NSL Program:</b>			
57.306(b)(2)(ii), Documentation of Cost of Attendance	304	0.25	76
57.308(a), Promissory Note	304	0.50	152

57.310(b)(1)(i), Documentation of Entrance Interview	304	0.50	152
57.310(b)(1)(ii), Documentation of Exit Interview	486	0.14	68
57.315(a)(1)&(a)(4), Program Records	486	5	2,430
57.315(a)(2), Student Records	486	1	486
57.315(a)(3), Repayment Records	486	2.51	1,220
<b>NSL Subtotal</b>			<b>4,584</b>

HPSL data includes active and closing Loans for Disadvantaged Students (LDS) program schools

### REPORTING REQUIREMENTS

Regulatory/section requirements	Number of Respondents	Responses per Respondent	Total annual responses	Hours per response	Total hour burden
<b>HPSL Program:</b>					
57.206(a)(2), Student Financial Aid Transcript	4,600	1	4,600	0.25	1,150
57.208(c), Loan Information Disclosure	325	299.5	97,338	0.63	61,323
57.210(b)(1)(i), Entrance Interview	325	139.5	45,338	0.50	22,669
57.210(b)(1)(ii), Exit Interview	334	113.5	37,909	1.00	37,909
57.210(b)(1)(iii), Notification of Repayment	334	862.5	288,075	0.38	109,469
57.210(b)(1)(iv), Notification During Deferment	333	17	5,661	0.63	3,566
57.210(b)(1)(vi), Notification of Delinquent Accounts	334	172.5	57,615	1.25	72,019
57.210(b)(1)(x), Credit Bureau Notification	334	6	2,004	0.50	1,002
57.210(b)(4)(i), Write-off of Uncollectible Loans	520	1	520	3	1,560
AOR HRSA-501	432	1	432	21	9,072
Deferment HRSA- 519	4,600	1	4,600	.5	2,300
57.211(a) Disability Cancellation	3	1	3	1	3
57.215(a)(2), Administrative Hearings	0	0	0	0	0
57.215(a)(d), Administrative Hearings	0	0	0	0	0

<b>HPSL Subtotal</b>	<b>*334</b>		<b>544,094</b>		<b>322,042</b>
----------------------	-------------	--	----------------	--	----------------

**REPORTING REQUIREMENTS Continued**

<b>Regulatory/section requirements</b>	<b>Number of Respondents</b>	<b>Responses per Respondent</b>	<b>Total annual responses</b>	<b>Hours per response</b>	<b>Total hour burden</b>
<b>NSL Program:</b>					
57.306(a)(2), Student Financial Aid Transcript	4,100	1	4,100	0.25	1,025
57.310(b)(1)(i), Entrance Interview	282	17.5	4,935	0.42	2,073
57.310(b)(1)(ii), Exit Interview	348	9	3,132	0.42	1,315
57.301(b)(1)(iii), Notification of Repayment	348	9	3,132	0.27	846
57.310(b)(1)(iv), Notification During Deferment	348	1.5	522	0.29	151
57.310(b)(1)(vi), Notification of Delinquent Accounts	348	42.5	14,790	0.04	592
57.310(b)(1)(x), Credit Bureau Notification	348	709	246,732	0.006	1,480
57.310(b)(4)(i), Write-off of Uncollectible Loans	23	1	23	3	69
57.311(a), Disability Cancellation	16	1	16	1	16
57.315(a)(1)(ii), Administrative Hearings	0	0	0	0	0
57.316(a)(d), Administrative Hearings	0	0	0	0	0
AOR HRSA-501	304	1	304	21	6,384
Deferment HRSA- 519	4,100	1	4,100	.5	2,050
<b>NSL Subtotal</b>	<b>*348</b>		<b>277,814</b>		<b>16,001</b>
<b>TOTAL</b>	<b>**348</b>		<b>816,877</b>		<b>338,043</b>

\*Includes active and closing schools.

**RECORDKEEPING REQUIREMENTS Basis for Burden:**

The estimates of burden for the schools are for the maintenance of required records on the history and status for each loan account.

The total burden for the HPSL and NSL schools is **25,080**.



**REPORTING REQUIREMENTS** Basis for Burden:

The total burden for the HPSL and NSL schools is **338, 043**.

12B. The total cost burden for the **recordkeeping** of the HPSL and NSL program is **\$296,338.38** (please see chart below for breakdown). Some of these record keeping burdens are shared with Title IV programs. For those that are shared, we calculated a 50% cost. All others were calculated at 100% cost.

Shared recordkeeping burdens included: Documentation of Cost of Attendance, Documentation of Entrance Interview, Documentation of Exit Interview, Student Records, and Repayment Records

**RECORDKEEPING REQUIREMENTS**

<b>Regulatory/section requirements</b>	<b>Total Burden Hours</b>	<b>Hourly Wage Rate</b>	<b>Percent of shared time and cost</b>	<b>Total Respondent Costs</b>
<b>HPSL Program:</b>				
57.206(b)(2), Documentation of Cost of Attendance	454	18.46	50%	\$4,190.42
57.208(a), Promissory Note	540	18.46	100%	\$9,968.40
57.210((b)(1)(i), Documentation of Entrance Interview	540	18.46	50%	\$4,984.20
57.210(b)(1)(ii), Documentation of Exit Interview	176	18.46	50%	\$1,624.48
57.215(a)&(d), Program Records	4,750	18.46	100%	\$87,685.00
57.215(b), Student Records	4,750	18.46	50%	\$43,842.50
57.215(c), Repayment Records	9,286	18.46	50%	\$85,709.78
<b>HPSL Subtotal</b>	<b>20,496</b>			<b>\$238,004.78</b>

<b>Regulatory/section requirements</b>	<b>Total Burden Hours</b>	<b>Hourly Wage Rate</b>	<b>Percent of shared time and cost</b>	<b>Total Respondent Costs</b>
<b>NSL Program:</b>				
57.306(b)(2)(ii), Documentation of Cost of Attendance	304	18.46	50%	\$2,805.92

57.308(a), Promissory Note	304	18.46	100%	\$5,611.84
57.310(b)(1)(i), Documentation of Entrance Interview	304	18.46	50%	\$2,805.92
57.310(b)(1)(ii), Documentation of Exit Interview	486	18.46	50%	\$4,485.78
57.315(a)(1)&(a)(4), Program Records	486	18.46	100%	\$8,971.56
57.315(a)(2), Student Records	486	18.46	50%	\$4,485.78
57.315(a)(3), Repayment Records	486	18.46	50%	\$4,485.78
<b>NSL Subtotal</b>	<b>2,856</b>			<b>\$58,333.60</b>
<b>TOTAL</b>				<b>\$296,333.38</b>

HPSL data includes active and closing Loans for Disadvantaged Students (LDS) program schools.

The total cost burden for the **reporting** of the HPSL and NSL program is **\$4.3 million** (please see chart below for breakdown). Some of these reporting burdens are shared with Title IV programs. For those that are shared, we calculated a 50% cost. All others were calculated at 100% cost.

Shared reporting burdens included: Entrance Interview, Exit Interview, Notification During Deferment, Notification of Delinquent Accounts, and Credit Bureau Notification

### REPORTING REQUIREMENTS

<b>Regulatory/section requirements</b>	<b>Total hour burden</b>	<b>Hourly Wage Rate</b>	<b>Percent of shared time and cost</b>	<b>Total Respondent Costs</b>
<b>HPSL Program:</b>				
57.206(a)(2), Student Financial Aid Transcript	4,600	18.46	100%	\$84,916.00
57.208(c), Loan Information Disclosure	325	18.46	100%	\$5,999.50
57.210(b)(1)(i), Entrance Interview	325	18.46	50%	\$2,999.75
57.210(b)(1)(ii), Exit Interview	334	18.46	50%	\$3,082.82
57.210(b)(1)(iii), Notification of Repayment	334	18.46	100%	\$6,165.64
57.210(b)(1)(iv), Notification During Deferment	333	18.46	50%	\$3,073.59

57.210(b)(1)(vi), Notification of Delinquent Accounts	334	18.46	50%	\$3,092.05
57.210(b)(1)(x), Credit Bureau Notification	334	18.46	50%	\$3,092.05
57.210(b)(4)(i), Write-off of Uncollectible Loans	520	18.46	100%	\$9,599.20
57.211(a) Disability Cancellation	3	18.46	100%	\$55.38
57.215(a)(2), Administrative Hearings	0	18.46	100%	\$0
57.215(a)(d), Administrative Hearings	0	18.46	100%	\$0
AOR HRSA-501	9,072	18.46	100%	\$167,469.12
Deferment HRSA- 519	2,300	18.46	50%	\$21,229
<b>HPSL Subtotal</b>	16,514			<b>\$310,774.10</b>

#### REPORTING REQUIREMENTS Continued

Regulatory/section requirements	Total hour burden	Hourly Wage Rate	Percent of shared time and cost	Total Respondent Costs
<b>NSL Program:</b>				
57.306(a)(2), Student Financial Aid Transcript	4,100	18.46	100%	\$75,686.00
57.310(b)(1)(i), Entrance Interview	282	18.46	50%	\$5,205.72
57.310(b)(1)(ii), Exit Interview	348	18.46	50%	\$3,212.04
57.301(b)(1)(iii), Notification of Repayment	348	18.46	100%	\$6,424.08
57.310(b)(1)(iv), Notification During Deferment	348	18.46	50%	\$3,212.04
57.310(b)(1)(vi), Notification of Delinquent Accounts	348	18.46	50%	\$3,212.04
57.310(b)(1)(x), Credit Bureau Notification	348	18.46	50%	\$3,212.04
57.310(b)(4)(i), Write-off of Uncollectible Loans	23	18.46	100%	\$424.58
57.311(a), Disability Cancellation	16	18.46	100%	\$295.36

57.315(a)(1)(ii), Administrative Hearings	0	18.46	100%	0
57.316(a)(d), Administrative Hearings	0	18.46	100%	0
AOR HRSA-501	6,384	18.46	100%	\$117,848.64
Deferment HRSA- 519	2,050	18.46	50%	\$18,924.32
<b>NSL Subtotal</b>				\$237,656.86
<b>TOTAL</b>				<b>\$548,430.96</b>

The wage rate used was 43-3031 Bookkeeping, Accounting, and Auditing Clerks.  
<https://www.bls.gov/ooh/office-and-administrative-support/bookkeeping-accounting-and-auditing-clerks.htm>

13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

There are no maintenance or operating costs. Respondents maintain the required information for their own purposes and the reports are generated automatically. The computers used to generate the reports have been acquired for usual and customary school operations.

14. Annualized Cost to the Federal Government

The total cost to the Federal Government to perform the review of requests for cancellation is \$8,570.

Disability Cancellations (a GS 14 step 7 at 10% of the time is \$13,442.60)

15. Explanation for Program Changes or Adjustments

There are currently 311,121 hours in the inventory with this submission requesting 338,043. This increased because we incorporated the forms OMB package 0915-0044 into this request. It had burden of 18,596. Additionally, there are more schools so the number of record-keepers and reporters have increased.

16. Plans for Tabulation, Publication and Project Time Schedule

There are no plans for tabulation, statistical analysis or publication of the information maintained by the schools.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

No exemption is being requested.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

This information fully complies with the guidelines in 5 CFR 1320.9. The certifications are included in this package.