#### VA Health Professional Scholarship Program (HPSP) and Visual Impairment and Orientation and Mobility Professional Scholarship Program (VIOMPSP) OMB FORM 2900-0793 VA Forms: 10-0491, 10-0491A, C thru N

#### A. JUSTIFICATION

## **1.** Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

This is a currently approved collection, but due to recent legislation we are adding two forms and amending existing forms. A collection of information is necessary to implement the Department of Veterans Affairs (VA) Visual Impairment and Orientation and Mobility Professionals Scholarship Program (VIOMPSP) and the VA Health Professional Scholarship Program (HPSP) that were authorized under Public Law 111-163 on May 5, 2010 and extended through December 31, 2033, by Section 301 of P.L. 115-182, The VA Mission Act of 2018.

The passage of this legislation allows VA to provide services to the public by awarding scholarships to non-VA employees who will be required to become VA employees in the professions for which they were educated under these programs. Section 304 of the Mission Act of 2018, authorized the creation of the Veterans Healing Veterans Medical Access and Education Scholarship Program (VHVMAESP). These programs will help address VA health care workforce needs. Legal authority for this data collection is also found under 38 U.S.C., Part I, Chapter 5, §527 that authorizes the collection of data that will allow measurement and evaluation of the Department of Veterans Affairs Programs, the goal of which is improved health care for Veterans and 38 U.S.C. §7501 (VIOMPSP), §7611 (HPSP), and §7601 (VHVMAESP) in order for VA to determine the applicant's eligibility to receive a scholarship award.

## 2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

The information required determines the eligibility or suitability of an applicant desiring to receive an award under the provisions of 38 U.S.C. §7601 through §7619 and 38 U.S.C. §7501 through §7505. The information is needed to apply for the VA HPSP, VIOMPSP, or VHVMAESP. HPSP awards scholarships to students receiving education or training in a direct or indirect healthcare services discipline to assist in providing an adequate supply of such personnel for VA and for the United States. VIOMPSP awards scholarships to students pursuing a program of study leading to a degree in visual impairment or orientation and mobility in order to increase the supply of qualified blind rehabilitation specialists for VA and the Nation. VHVMAESP awards scholarships to Veterans pursuing education in medical school.

# 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

VA will allow applicants to submit and update application packages online and via facsimile. This method allows VA to receive, validate submission, and electronically transmit applications to technical

reviewers before forwarding to selecting officials for approval. VA is diligently working on a fully automated electronic cloud-based application management system to expedite processing and reduce burden.

## 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Through the prior submission, we established a new collection for the revised VA HPSP, which was amended in response to section 603 of the 2010 Act, Public Law 111–163, for VIOMPSP, which was established by section 302 of the 2010 Act. On August 20, 2013, 78 FR 51067, AO34 was published as final in the <u>Federal Register</u>. This final rule implements Public Law 111-163. There are no duplicative collections.

## 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

As these are applications for individual benefits, no small businesses or other small entities are impacted by the information collection.

## 6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

VA would not be responsive to the needs of the student and to the legal requirement to release of information if information were collected less frequently.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; 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 and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no such special circumstances.

# 8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

For PRA clearance renewal of this collection, the notice of Proposed Information Collection Activity was published in the Federal Register with a 60-day notice on June 10, 2010 (84 FR 26936) and a 30-day notice on August 19, 2019 (84 FR 42991). To date, VA has not received any comments in response to these notices.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or

reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices.

## 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift is provided to respondents.

## 10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Information on these forms will become part of a system of records which complies with the Privacy Act of 1974 as set forth in the Compilation of Privacy Act Issuances via online GPO access at http://www.gpoaccess.gov/privacyact/index.html. The original System of Records (73VA14) for the HPSP was issued on 10/6/1982. It was updated on four other occasions, the last one being on 11/27/2009. VA is actively engaged in updating and amending the HPSP System of Records. The amended version (73VA10A2A) will include the VIOMPSP and VHVMAESP.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

### 12. Estimate of the hour burden of the collection of information:

a. The number of respondents, frequency of responses, annual hour burden, and explanation for each form is reported as follows:

Category of Respondent	No. of Respondents	Participation Time	Burden Hours
VIOMPSP			
Individuals (Applicants)	100	180 minutes	288.3
Individuals (of Applicants selected to receive scholarship award)	10	95 minutes	16.2
Total			304.5
HPSP			
Individuals (Applicants)	1,700	180 minutes	6,318.3
Individuals (of Applicants selected to receive scholarship award)	160	120 minutes	373.1
Total			6,691.4

GRAND TOTAL for VIOMPSP and HPSP			6,995.9
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**Note:** Since last OMB approval of information collection, we have adjusted or estimates downward by 3300 HPSP respondents and 400 VIOMPSP respondents. We base our estimate on 3-years of historical data collection and recent budget and regulatory guidance restrictions.

## b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13.

#### ESTIMATE OF THE HOUR BURDEN FOR THE COLLECTION OF INFORMATION

## VISUAL IMPAIRMENT AND ORIENTATION AND MOBILITY PROFESSIONALS SCHOLARSHIP PROGRAM (VIOMPSP)

#### **APPLICANTS**

VA Forms:	# of respondents	x # of responses	Equals	x # of minutes	Equals (minutes)	÷ by 60 =	Number of Hours
10-0491g- Application	100	1	100	60	6,000		100
<b>10-0491-</b> Academic Verification	100	1	100	60	6,000		100
<b>10-0491e-</b> Evaluation & Recommendation	100	2	200	50	5,000		83.3
<b>10-0491a-</b> Addendum to Application	30 (30%)	1	30	10	300		5
TOTAL							288.3

#### APPLICANTS SELECTED TO RECEIVE A SCHOLARSHIP

VA Forms:	# of respondents	x # of responses	Equals	x # of minutes	Equals (minutes)	÷ by 60 =	Number of Hours
<b>10-0491L-</b> Agreement for the VIOMPSP	10	1	10	15	150		2.5
<b>10-0491m-</b> VA Scholarship Mobility Agreement	10	1	10	10	100		1.7
<b>10-0491k-</b> VA Scholarship Offer Response	10	1	10	10	100		1.7
<b>10-0491i-</b> Notice of Change and/or Annual Academic Status Report	10	1	10	20	200		3.3
<b>10-0491h-</b> Notice of Approaching Graduation	10	1	10	10	100		1.7
<b>10-0491d-</b> Education Program Completion Notice/ Service Obligation Placement	10	1	10	20	200		3.3
<b>10-0491j-</b> Request for Deferment for Advanced Education	2	1	2	10	20		.3
<b>10-0491c-</b> Annual VA Employment/ Deferment Verification	10	1	10	10	100		1.7
TOTAL							16.2
GRAND TOTAL for VIOMPS	P						304.5

#### HEALTH PROFESSIONAL SCHOLARSHIP PROGRAM (HPSP)

#### **APPLICANTS**

VA Forms	# of respondents	x # of responses	Equals	x # of minutes	Equals (minutes)	÷ by 60 =	Number of Hours
10-0491g- Application	1,700	1	1,700	60	102,000		1,700
<b>10-0491-</b> Academic Verification	1,700	1	1,700	60	102,000		1,700
<b>10-0491e-</b> Evaluation & Recommendation	1,700	2	3,400	50	170,000		2,833.3
<b>10-0491a-</b> Addendum to Application	510 (30%)	1	510	10	5,100		85
TOTAL							6,318.3

#### APPLICANTS SELECTED TO RECEIVE A SCHOLARSHIP

VA Forms:	# of respondents	x # of responses	Equals	x # of minutes	Equals (minutes)	÷ by 60 =	Number of Hours
<b>10-0491f-</b> Agreement for the HPSP	160	1	160	15	2,400		40
<b>10-0491n-</b> Agreement for the VHVMAESP	20	1	20	15	300		5
<b>10-0491m-</b> Mobility Agreement	160	1	160	10	1,600		26.7
<b>10-0491k-</b> VA Scholarship Offer Response	160	1	160	10	1,600		26.7
<b>10-0491i-</b> Notice of Change and/or Annual Academic Status Report	480	1	480	20	9,600		160
<b>10-0491h-</b> Notice of Approaching Graduation	160	1	160	10	1,600		26.7
<b>10-0491d-</b> Education Program Completion Notice/ Service Obligation Placement	160	1	160	20	3,200		53.3
<b>10-0491j-</b> Request for Deferment for Advanced Education	48 (30%)	1	48	10	480		8
<b>10-0491c-</b> Annual VA Employment/ Deferment Verification	160	1	160	10	1,600		26.7
TOTAL							373.1
GRAND TOTAL for HPSP	GRAND TOTAL for HPSP						6,691.4
<b>GRAND TOTAL for BOTH</b>	GRAND TOTAL for BOTH VIOMPSP and HPSP				1.5 = 6,995.9	)	~ 6,996

**Note:** The estimated 1,700 respondents for HPSP and 100 respondents for VIOMPSP include the 170 applicants who will be selected to receive awards.

c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

VHA uses general wage data to estimate the respondents' costs associated with completing the information collection. In accordance with the Bureau of Labor Statistics (BLS) May 2018 Occupational Wage Code Median Hourly, the mean hourly wage is \$24.98 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website: <a href="https://www.bls.gov/oes/2018/may/oes\_nat.htm">https://www.bls.gov/oes/2018/may/oes\_nat.htm</a>.

Legally, respondents may not pay a person or business for assistance in completing the information collection, and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs.

VHA estimates the total annualized cost to respondents to be \$174,760.08 (6,996 burden hours x \$24.98 per hour).

## 13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- a. There are no capital, start-up, operation or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
- c. There is no anticipated recordkeeping burden beyond that which is considered usual and customary.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

#### VIOMPSP

The estimated annual cost to the Federal government is \$827,000 including:

- \$265,000 for salaries and fringe benefit multiplier of 27% for 3 new full-time employees (one GS-13/5 Program Manager, one GS-11/5 Program Analyst, and one GS-7/5 Program Assistant),
- \$450,000 for 30 scholarship awards at up to \$15,000 each, and
- \$112,000 for operating costs for leased space, furniture, and computers. Information technology costs including an IT appropriation requirement are for expanding and support of the Education Systems Database to include the new scholarship program.

### <u>HPSP</u>

The estimated annual cost to the Federal government, is \$27,689,000 over 5-years including:

• Salary costs of \$833,000 over 5-years include funding for two additional FTE positions including (1) GS12 Financial Manager, FM and (1) GS6 Program Support Assistant, PSA. FM will assist allow for appropriate segregation of duties and manage increased workload to 160 new scholarships per year. PSA will assist in managing program. Currently, detailed individuals and

students are being relied upon. This causes issues with continuity and consistency. These individuals will report to the current Program Manager, HPSP, Scholarships & Clinical Education, Workforce Management & Consulting. The 2018 Washington DC Salary Table was used to determine average salary figures. Salary costs include a fringe benefit multiplier of 34% and an inflation rate of 3.4%.

- VHA scholarship award cost totaling 26,856,000 over 5-years are based on the average annual award of \$53,600, which includes tuition charges, miscellaneous expenses, and a monthly stipend, which are based on the averages of historical payments to schools and students. HPSP awards are made on a competitive basis to eligible students who meet certain selection criteria. During the selection process, students are ranked with their peers for each health care profession. The amount of funds available each year determines the number of students selected for awards and operating costs will not be exceeded. Of the scholarships awarded, not less than 50 scholarships are awarded each year to individuals who are accepted for enrollment or enrolled in a program of education or training leading to employment as a physician or dentist until such date as the Secretary determines that the staffing shortage of physicians and dentists in the Department is less than 500. Scholarship amounts increased annually based off a 3.3% average increase as published by The College Board.
- Operating costs are built into the total scholarship award cost and consists of costs from two areas: Information Technology (IT) costs and marketing costs. IT will consist of a \$100,000 budget used for expanding the Education Systems Software Application to include the purchase of new scholarship management software. Marketing cost of \$20,000 includes costs associated with attending conferences, advertising, etc. to attract quality candidates for the program. A 3.4% inflation rate was used in these calculations.

#### 15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14.

This is a revision to an approved collection to include all aspects of the VHVMAESP and to add a Mobility Agreement and a VHVMAESP Agreement. All burden hours are considered a program increase. The authorization under the Mission Act of 2018, Section 301, increases the availability of scholarship by a minimum of 50 Physician scholarships per year and Section 304, adding an additional 20 scholarships for the Veterans Healing Veterans Medical Access and Education Scholarship Program (VHVMAESP).

# 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

VA does not intend to publish this data.

## 17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

VA seeks to minimize the cost to itself of collecting, processing and using the information by not displaying the expiration date. VA seeks an exemption that waives the displaying of the expiration date on this VA Form. The VA Form may be reproduced by the respondents and VA field facilities from the Internet and then stocked. If VA is required to display an expiration date, it would result in unnecessary waste of existing stock of the forms. Inclusion of the expiration date would place an unnecessary burden

on the respondent (as they would find it necessary to obtain a newer version, while VA would have accepted the old one).

## 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

There are no exceptions.