

**SUPPORTING STATEMENT FOR 2900-0205, TITLE 38 POSITIONS -
APPLICATIONS AND APPRAISALS FOR EMPLOYMENT
VA FORMS 10-2850, 10-2850a, 10-2850c and FL 10-341(a)**

A. JUSTIFICATION

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

The collection of this information is authorized by Title 38, United States Code (U.S.C.) 7403, (Veterans' Benefits), which provides that appointments of Title 38 employees will be made only after qualifications have been satisfactorily verified in accordance with regulations prescribed by the Secretary. Occupations listed in 38 U.S.C. 7401(1) and 7401(3) (Appointments in Veterans Health Administration), are appointed at a grade and step rate or an assignment based on careful evaluation of their education and experience.

VA Forms 10-2850, 10-2850a and 10-2850c are applications designed specifically to elicit appropriate information about each candidate's qualifications for employment with Department of Veterans Affairs (VA) as well as educational and experience. To assure that a full evaluation of each candidate's credentials can be made prior to employment, the forms require disclosure of details about all licenses ever held, Drug Enforcement Administration certification, board certification, clinical privileges, revoked certification or registration, liability insurance history, and involvement in malpractice proceedings.

VA Form Letter (FL) 10-341a is the pre-employment reference form used to elicit information concerning the prior education and/or performance of the Title 38 applicant. Information provided is used to determine eligibility for employment and the appropriate grade and step rate or assignment.

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.

Individuals applying for Title 38 positions must complete one of the following: VA Forms 10-2850, 10-2850a, or 10-2850c. VA sends FL 10-341a to the educational institutions, organizations and individuals indicated by the applicant on the employment application form. The application forms are reviewed by field station officials, including Medical Center Directors, Chiefs of Staff, Human Resources Management Officers or designees and members of Professional Standards Boards (Board of Peers). These individuals ensure that the applicants meet administrative and regulatory requirements for VA employment, and recommend appointment grade and step rate or assignment based on the individual's qualifications. If the information were not collected on these applications forms and the Form Letter, qualifications could not be assessed.

In addition, all licensed health professional who have or had a previously held license, certification, registration, or Drug Enforcement Agency (DEA) registration must be screened against the National Practitioner Data Bank (NPDB), and/or the (State License Board) SLB databases and/or national certification agencies as appropriate.

- a. VA Form 10-2850, Application for Physicians, Dentists, Podiatrists, Optometrists, and Chiropractors, will collect information used to determine eligibility for appointment to VHA.

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- b. VA Form 10-2850a, Application for Nurses and Nurse Anesthetists, will collect information used to determine eligibility for appointment to VHA.
- c. VA Form 10-2850c, Application for Associated Health Occupations, will collect information used to determine eligibility for appointment to VHA.
- d. VA Form Letter 10-341(a), Appraisal of Applicant, will collect information used to determine if applicant meets the requirements for employment.

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 described any consideration of using information technology to reduce burden.

VA uses the Web site <http://www.vacareers.com> as a portal for applicants to seek information regarding Physician, Nurse and Other Allied Health Occupation employment at 1,255 health care facilities, including 170 Veterans Affairs (VA) Medical Centers and 1,074 outpatient sites of care across the country. Interested applicants can log onto the applications system Web site, look through the job listings provided by the medical centers, and either complete the application on-line or download a *.pdf version of the form fill it out, and mail it. Improved information technology will not decrease the burden on the public.

The *.pdf version of these forms are available on <http://vaww.va.gov/forms/medical/searchlist.asp>. These forms are in a fillable or print and fill mode. To meet the requirements of the Government Paperwork Elimination Act (GPEA) VA is currently conducting cost benefits and risk analysis studies on these forms to determine if more action is warranted.

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.

For the VA Form 10-2850 series, there is no other source of applicant data that is accessible to management and human resources officials charged with making employment determinations. The Credentialing data collection verifies from the primary source such information required by the Joint Commission on Accreditation of Healthcare Organizations as the credentialing organization, educational institution, hospital, Federal, state and local governments, licensing board and the National Practitioner Database.

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

Small businesses are involved only in responding to Form Letter 10-341a. Every effort has been made to minimize the burden. Most questions have been phrased so that the respondent simply checks the appropriate answer. Every effort has been made to minimize the burden to small businesses by keeping questions simple and to an absolute minimum.

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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.

Title 38 U.S.C. 7403 provides that appointments of Title 38 individuals will be made only after qualifications have been satisfactorily established in accordance with regulations prescribed by the Secretary. If the information were not collected, qualifications of applicants could not be assessed and appointments could not be made to VA Medical Centers. The information must be collected in order to meet screening requirements.

The collection is handled on a one-time basis at each medical center to which a Title 38 candidate applies through a single submission for a position. FL 10-341a is used only once for a former supervisor or employer and every education institution listed by the applicant for a position to verify completion of degree requirements. No further reduction is feasible if the agency is to continue employing quality health care professionals and providing clinical training for VA and the Nation as required by statute.

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.

The 60-day notice of Proposed Information Collection Activity was published in the Federal Register on April 15, 2020 (Volume 85, Number 73, Page 21071). VA received no comments in response to this notice.

The 30-day notice of Proposed Information Collection Activity was published in the Federal Register on November 19, 2020 (Volume 85, Number 224, Pages 73851 and 73852). VA has not received comments in response to this notice, to date.

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.

These forms are routinely reviewed to assure that all elements essential for hospital accreditation and credential verification are included. This assures the safety requirements of VA patients are

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adequately addressed. Comments of candidates for VA employment about these application forms are considered on a continuing basis. 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.

The Privacy Act Notice on these forms indicates that information is requested under Title 38, (U.S.C.). Information provided may be released by the Agency under certain circumstances described in the Notice. Records are maintained in the system identified as "Applicants for Employment under Title

38, U.S.C.-VA" (02VA135), in the 2003 Compilation of Privacy Act Issuances via online GPO access at http://www.access.gpo.gov/su_docs/aces/2003_pa.html.

11. Provide additional justification for any questions of a sensitive nature, 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. Total annual burden hours are estimated at 76,482 hours.

Form	Respondents	Frequency	Annual Responses	Min.	Annual Burden Hours
10-2850	16,128	1	16,128	30	8,064
10-2850a	64,511	1	64,511	30	32,256
10-2850c	21,504	1	21,504	30	10,752
FL 10-341a	50,820	1	50,820	30	25,410
TOTAL	152,963				76,482

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.

See chart in subparagraph 12a above.

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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.

VA cannot make assumptions about the population of respondents because of the variability of factors, such as the educational background and wage potential of respondents. Therefore, VHA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. In accordance with the latest available BLS Occupational Wage Code Median Hourly (May 2019), the mean hourly wage is \$25.72 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: https://www.bls.gov/oes/current/oes_nat.htm.

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VHA estimates the total cost to all respondents to be \$1,967,117.04 (76,482 burden hours x \$25.72 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.

Cost to the Federal Government is estimated at \$15,172,527:

10-2850	\$1,992,764
10-2850a	\$3,442,887
10-2850c	\$1,433,600
FL 10-341a	\$8,303,276
TOTAL	\$15,172,527

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Key to Interpreting Cost Data		
COS	Chief of Staff	\$143/hour
SC	Service Chief	\$85/hour
P/D	Physician/Dentist	\$118/hour
SHS	Senior House Staff - Resident or Intern	\$26/hour
RN	Nurse, Intermediate Grade	\$42/hour
P/VT	Physical/Vocational Therapist, EFDA, Physicians Assistant	\$44/hour
LPN/LVN	Licensed Practical/Vocational Nurse	\$25/hour
HR Spec.	Human Resources Specialist (GS 11/4)	\$34/hour
MD PSB	MD Professional Standards Board - COS and 2 SC	\$303/hour
RN PSB	Nursing Standards Board – 3 Intermediate Grade Nurses	\$126/hour
RN PSB	House Staff Review Committee - COS, 2 SC & 2 SHS	\$365/hour
LPN/LVN SB	LPN/LVN Standards Board - 2 RN and LPN	\$109/hour
OSB	Other Standards Board – 2 P/D and P/VT	\$280/hour
	Clerical (GS 4/4)	\$17/hour

a. Cost for VA Form 10-2850 is estimated at \$1,992,764.

Processing:	16,128 apps. x 20 min x \$143/hour review by COS	\$768,768
	16,128 apps. x 15 min x \$303/hour review by MD PSB	\$1,221,696
Printing/Distribution		\$2,300

b. Cost for VA Form 10-2850a is estimated to be \$3,442,887.

Processing:	64,511 applications x 20 min x \$126/hour for RN PSB	\$2,709,462
	64,511 applications x 20 min x \$34/hour review by HR Specialist	\$731,125
Printing/Distribution		\$2,300

c. Cost for VA Form 10-2850c is estimated to be \$1,433,600.

Processing:	14,336 app's x 20 min x \$109/hour for LPN/LVN SB	\$520,875
	7,168 applications x 20 min x \$280/hour for OSB	\$669,013
	21,504 applications x 20 min x \$34/hour review by HR Specialist	\$243,712
Printing/Distribution		\$2,300

d. Cost for VA Form Letter 10-341a is estimated to be \$8,303,276.

Processing:	Clerical	=	50,820 x 15 min x \$ 17/hour	=	\$215,985
	HRS	=	50,820 x 30 min x \$ 34/hour	=	\$863,940
	MD PSB	=	15,609 x 15 min x \$303/hour	=	\$1,182,382
	RN PSB	=	62,436 x 15 min x \$126/hour	=	\$1,966,734
	HSRC	=	33,299 x 15 min x \$365/hour	=	\$3,038,534
	LPN/LVN SB	=	14,190 x 15 min x \$109/hour	=	\$386,678
	OSB	=	8,041 x 15 min x \$280/hour	=	\$562,870

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Printing/Distribution		\$2,300
Postage	50,820 x \$0.55 outgoing	\$27,951
	50,820 x \$1.10 return	\$55,902

15. Explain the reason for any program changes or adjustments reported in Items 13 or 14.

VA increased the number of anticipated respondents for each form due to projected increases in Title 38 program applications since the last PRA clearance.

Note that VA Form 10-2850D is part of the collection under 2900-0205, but OMB issued a separate NOA on October 10, 2019, due to necessary expedited review in conjunction with a new VA regulation. Therefore, the burden for VA Form 10-2850D is not included in this request for a new 3-year PRA clearance for the remaining forms in 2900-0205.

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.

There are no plans to publish the results of the information collected.

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 does not seek to omit the expiration date.

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 such exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used in this data collection.