Supporting Statement A

Nurse Corps Scholarship Program (NCSP) OMB Control No. 0915-0301

Revision

Terms of Clearance: None

A. Justification

1. Circumstances Making the Collection of Information Necessary

This is a request for revision of the Nurse Corps Scholarship Program (NCSP) application and participant monitoring forms. The NCSP is authorized by 42 USC 297n(d) (section 846(d) of the Public Health Service Act, as amended by Public Law 101-205. The application and forms are approved under OMB No. 0915-0301, which expires 5/31/2021.

NCSP provides scholarships to eligible nursing students in exchange for a full or parttime service commitment at an eligible healthcare facility with a critical shortage of nurses. To be eligible, an applicant must be enrolled or accepted for enrollment at an accredited school of nursing in a graduate, baccalaureate, associate degree or diploma program. A student must be a U.S. citizen, U.S. national, or lawful permanent resident free of any federal judgment liens, free from existing service commitments, and not in default of any federal debt. Eligible applicants are awarded scholarships based on funding preferences.

Under the NCSP, students seeking to become registered nurses are offered the opportunity to enter into a contractual agreement under which the U.S. Department of Health and Human Services agrees to pay their school tuition, required fees, other reasonable costs, and a stipend for living expenses. In exchange, the scholarship recipient agrees to provide full-time, or part-time if approved by the Secretary, clinical services at a health facility designated by the NCSP as having a critical nursing shortage. The minimum service commitment is 2 years, and the maximum is 4 years, depending on the number of years of scholarship support awarded.

2. Purpose and Use of Information Collection

The NCSP collects data to determine an applicant's eligibility for the program, monitor a participant's continued enrollment in a school of nursing, monitor the participant's compliance with the NCSP service obligation, and prepare annual reports to Congress. Generally, the following information will be collected (1) from the schools of nursing, on a quarterly basis—general applicant and nursing school data such as full name, location, tuition/fees, and enrollment status; (2) from the schools of nursing, on an annual basis—data concerning tuition/ fees and overall student enrollment status; and (3) from the participant's and their employing CSF, on a biannual basis—data concerning the participant's employment status, work schedule and leave usage.

The Employment Verification Form has been updated to include two questions about participants who work at multiple sites. The In-Service Verification form has been updated to include questions on telehealth and mental health services provided by NCSP participants. Additionally, the application will include a question about participation in other federal pipeline programs.

3. Use of Improved Information Technology and Burden Reduction

The NCSP utilizes the BMISS, an IT system used to collect, process and monitor information regarding participants' application to and compliance with the program. The link to the online NCSP application is available here: https://programportal.hrsa.gov/. Banking information which was previously uploaded is now electronically completed through BMISS. Participants are able to log-in to BMISS to fill out the necessary information online.

4. Efforts to Identify Duplication and Use of Similar Information

The information collected is specific to the applicant and unique to this program. No other source of this information is known to exist for completion of the application and monitoring forms.

5. Impact on Small Businesses or Other Small Entities

The information collection will not have a significant impact on small entities.

6. Consequences of Collecting the Information Less Frequently

This program has an annual application cycle, thereby making it necessary to collect information from each year's cohort of applicants. If not selected, an applicant may reapply in the next annual cycle. In addition, the monitoring process for compliance with contractual requirements necessitates semi-annual employment verification. The consequence of less frequent monitoring is reduced oversight and compliance with the service requirements and a resultant reduction in nurses providing care in facilities with critical shortage of nurses.

7. <u>Special Circumstances Relating to the Guidelines of 5 CFR 1320.5</u>

This information collection fully complies with 5 CFR 1320.5(d)(2).

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

The notice required in 5 CFR 1320.8(d) was published in the Federal Register on October, 4, 2019, Vol. 84, No. 193, pp. 53158-160. The comment period closed on December 3, 2019 and no comments were received. Additionally, this program has consulted with three individual applicants to the NCSP to obtain constructive feedback to improve the application, improve efficiency, and minimize the collection burden. The comments on clarity of the application and forms were positive. The applicants found the application instructions and materials to be clear and straight forward. There were no suggestions for improvement.

9. Explanation of any Payment/Gift to Respondents

Respondents will not receive any payments or gifts.

10. Assurance of Confidentiality Provided to Respondents

Data collected on the individual NCSP application and monitoring forms is housed in a system of record under the Privacy Act of 1974 – the "Public Health Service and National Health Service Corps Health Care Provider Records System" (09-15-0037). Information provided on each selected application will be maintained for at least 2 years and up to 10 years. This is necessary to permit the monitoring of NCSP participants through the completion of the Program's service commitments.

11. Justification for Sensitive Questions

HHS requires that race and ethnicity be collected on all HHS data collection instruments. Questions regarding race and ethnicity are asked in the online application; however, responses to these questions are optional. The Social Security number is required because the amount received for the stipend and tuition payments must be reported to the Internal Revenue Service as income to the scholarship recipient.

The applicant's income information is required to determine whether the applicant meets the statutory funding preference of funding applicants who demonstrate the greatest financial need. The Right to Financial Privacy Act (RFPA), Public Law 95-630, regulates the Federal Government's access to the financial records of individuals maintained by a financial institution. The financial information collected through the application complies with the RFPA requirements for customer authorization for disclosure of financial records.

The applicant's banking information is necessary to electronically transmit stipend payments to the individual's financial institution, as required by the Debt Collection Improvement Act of 1996 and 31 CFR Parts 208 and 210.

12. Estimates of Annualized Hour and Cost Burden

Form Name	No. of Respondents	No. Responses per Respondent	Total number of Responses	Average Burden per Response (in hours)	Total Burden Hours
Eligible Applications/ Application Program Guidance	2,600	1	2,600	2	5,200
School Enrollment Verification Form	500	4	2,000	.33	660
Confirmation of Interest Form	250	1	250	.2	50
Data Collection Worksheet Form	500	1	500	1	500
Graduation Close Out Form	200	1	200	.17	34
Initial Employment Verification Form	500	1	500	.42	210
In Service Verification Form	1,000	2	2,000	.12	240
Verification of Academic Standing	500	1	500	.33	165
CSF Verification Form	200	1	200	.2	40
Authorization to Release Information Form	200	1	200	.2	40
Total	6,450		8,950		7,139

The estimates of reporting burden for Applications are as follows;

Basis for estimates:

Each applicant may only complete one online application per fiscal year. The application consists of eligibility requirements (school enrollment, citizenship and lawful permanent resident status); general information (name, address, school attended, degree(s) program, (average of 3 documents per applicant), plus any necessary supporting documentation. Burden estimate was derived from the comments received by the individuals described in the outside consultation section.

Estimates Annualized Burden Costs

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Nursing Scholar Applicants	5,250	\$21.90	\$114,975
School/Academic Institutions	1,359	\$40.00	\$54,360
Nursing Scholars in Service	40	\$43.80	\$1,752
Employers	450	\$50.00	\$22,500
Total	7,099		\$193,587 x 2 = \$387,174

Basis for Estimates:

Scholarship applicants may be students and/or may be in the workforce and are accepted into a nursing degree program. Since applicant employment status is mixed, a value of \$21.90 per hour was estimated.

Based on data from the Bureau of Labor Statistics' (BLS) Occupational Outlook Handbook, the national average hourly wage for registered nurses and nurse practitioners is approximately \$34.70 and \$52.90 per hour. The nursing workforce would earn a mean, hourly wage of approximately \$43.80 per hour (\$34.70 + \$52.90 = \$87.60; \$87.60/2 = \$43.80). As such, the combined total burden hours and total hour cost for the Nurse Corps SP (including employer, academic institution, applicant, and participant burden hours) would be hours and cost respectively.

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

All equipment and software are internally maintained at the Nurse Corps SP as part of its normal business practice. Other than their time, there is no cost to respondents.

14. Annualized Cost to Federal Government

The average annual costs to the government for implementing the on-line application and processing are as follows:

Contract costs for on-line application:	\$2,150,000
Staff Review	<u>\$40,543</u>
Total annualized cost:	\$2,190,543

Contract costs for the on-line application system include upgrades, enhancements, and fixes to the online system. The initial review of the data collection worksheet, school verification and employment certification forms is estimated at 20 minutes at an hourly cost of \$46.78 (Reviewing applications: 2,600 x (2/6) hour x \$46.78/hour = \$40,543).

15. Explanation for Program Changes or Adjustments

The total burden hour request has been changed from 6934 to 7139 hours as a result of additional application questions about telehealth services, multiple CSF sites, salary, and occupational specializations.

The implementation of the BMISS as the vehicle to collect online applications has been enhanced with improved IT functionality allowing more forms to be submitted electronically to verify service by the participant and employer, allow recommendation letters to be submitted online, and to allow electronic submission of participants' banking information for stipend payments which previously had to be uploaded.

16. Plans for Tabulation, Publication, and Project Time Schedule

Section 846(h) of the Public Health Service Act requires annual reports to Congress regarding participant demographics, service sites, default information, etc. These reports provide information tables as well as analysis of trends and evaluation of the program.

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. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.