

Health Resources and Services Administration

Bureau of Health Workforce (BHW)

The National Health Service Corps Scholarship Program, the National Health Service Corps Students to Service Loan Repayment Program, and the Native Hawaiian Health Scholarship Program

OMB Control No. 0915-0146, Revision

Supporting Statement A

A. Justification

1. Circumstances Making the Collection of Information Necessary

This is an information collection request for the revision of the National Health Service Corps (NHSC) Scholarship Program (SP), NHSC Students to Service Loan Repayment Program (S2S LRP), and the Native Hawaiian Health Scholarship Program (NHHSP) applications and forms (OMB #: 0915-0146, Expiration Date: 7/31/2020). The program applications, forms, and supporting documentation are used by potential applicants to the Health Resources and Services Administration's (HRSA) Bureau of Health Workforce's (BHW) NHSC SP, NHSC S2S LRP, and NHHSP. The legislative authorities for each program are as follows:

- NHSC SP: Section 338A of the Public Health Service (PHS) Act and Section 338C-H of the Public Health Service (PHS) Act (Attachment B).
- NHSC S2S LRP: Section 338B of the Public Health Service (PHS) Act (Attachment B) and Section 331(i) of the Public Health Service (PHS) Act (Attachment A).
- NHHSP: The Native Hawaiian Health Care Improvement Act of 1992, as amended [42 U.S.C. 11709]; regulations applicable to the National Health Service Corps Scholarship Program (42 CFR Part 62, Subpart A) are also applicable to this Scholarship Program, except to the extent those regulations are inconsistent with 42 U.S.C. 11709, as amended (Attachment C).

The purpose of the NHSC SP, NHSC S2S LRP, and the NHHSP is to provide scholarships or loan repayment to qualified students who are pursuing primary care health professions education and training. In return, students agree to provide primary health care services at approved facilities located in designated Health Professional Shortage Areas (HPSAs) once they are fully trained and licensed health professionals. Awards are made to applicants who demonstrate the greatest potential for successful completion of their education and training as well as commitment to provide primary health care services to communities of greatest need.

The proposed revisions for this information collection request is to remove one form. BHW determined that the "Post Graduate Training Form" was mistakenly included in the "NHSC Students to Service Loan Repayment Program Application" section. This form is already included in the "NHSC

awardees/schools/post graduate training programs/sites” section and therefore was removed as a duplicate entry. Additionally, this information collection request seeks to add (3) new forms. BHW determined that the Native Hawaiian Health Scholarship Program intends to collect information through the “Scholar Enrollment Verification Form”, the “Change in Program Curriculum Form”, as well as the “NHHSP Graduation Documentation Form.”

2. Purpose and Use of Information Collection

The information collected in the online applications is necessary to determine which applicants are qualified and suitable to receive scholarship or loan repayment awards. Applicants are competitively selected for awards according to criteria required by Federal statute and regulation, and the priority needs of the NHSC SP, NHSC S2S LRP and the NHHSP.

The NHSC SP, NHSC S2S LRP, and NHHSP applications, forms, and supporting documentation are used to collect necessary information from applicants that will enable BHW to make determinations about the competitive awards. The respondents to these applications are qualified students who are pursuing primary care health professions education and training, and are interested in working with underserved populations.

The NHSC SP, NHSC S2S LRP, and NHHSP applications and forms seek to collect information that can be used to identify scholars who, when they complete their health professions education, will specialize in the delivery of primary health services, complete their period of obligated service in an acceptable manner, and subsequently be retained in practice in an area that has a shortage of health care personnel. The application and forms capture information that is relevant to identify applicants with the greatest potential to fulfill the objectives and who meet the criteria of each of the programs. It is particularly important to have applications that provide information by which the programs can assess which individuals are most willing and able to serve the underserved.

In terms of the information collection, some program forms vary (see program-specific burden charts below), general forms include:

- program application,
- academic and non-academic letters of recommendation,
- authorization to release information, and
- acceptance/verification of good standing report.

Additional forms for the NHSC SP and NHSC S2S LRP include:

- data collection worksheet, which is completed by the educational institutions of program participants,
- post graduate training verification form, which is completed by NHSC S2S LRP program participants and their residency director, and
- enrollment verification form, which is completed by program participants and the educational institution for each academic term of the program.

3. Use of Improved Information Technology and Burden Reduction

This information collection activity is web-based. Application instructions and forms are available at <http://nhsc.hrsa.gov/scholarships/index.html> for the NHSC SP, <http://nhsc.hrsa.gov/loanrepayment/studentstoserviceprogram/index.html> for the NHSC S2S LRP, and <http://www.nhhsp.org/> for the NHHSP.

4. Efforts to Identify Duplication and Use of Similar Information

The information collected is specific to the applicant and unique to these programs. No other source of this information is known to exist for completion of the applications and 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

The selection process for making awards must be completed annually. In the absence of collecting this data, review, selection, and approval of qualified applicants cannot be carried out.

There are no legal obstacles to reduce the burden.

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

The request fully complies with the regulation.

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 March 9, 2020, vol. 85, No. 46; pp. 13662-13663 (<https://www.govinfo.gov/content/pkg/FR-2020-03-09/pdf/2020-04762.pdf>).

There were no public comments.

Section 8B

To obtain an estimate of the burden collection for the approximate time (in hours) that it will take an individual to complete the NHSC SP, NHSC S2S LRP, and NHHSP applications, HRSA staff consulted the following individuals:

NHSC SP and NHSC S2S LRP:

The program has surveyed a total of nine (9) individual applicants to the NHSC SP and NHSC S2S LRP to obtain constructive feedback to improve the application, improve efficiency, and minimize the collection burden. There were no suggestions for changes or revisions.

NHHSP:

The program has surveyed a total of six (6) individual NHHSP staff members to obtain constructive feedback to improve the application, improve efficiency, and minimize the collection burden. There were no suggestions for changes or revisions.

9. Explanation of any Payment/Gift to Respondents

Respondents will not receive any payment or gifts.

10. Assurance of Confidentiality Provided to Respondents

Data collected on the individual NHSC SP, NHSC S2S LRP, and NHHSP applications and forms are stored in a system of records as defined under the Privacy Act of 1974. The application is included in the System of Records Notice, "The Public Health Service and National Health Service Corps Health Care Provider Records System" (0915-0037). Information provided on each selected application will be maintained for at least 2 years and up to 10 years to permit the monitoring of NHSC SP, NHSC S2S LRP, and NHHSP participants through the completion of their service commitments.

The Right to Financial Privacy Act (RFPA), P.L. 95-630, regulates the Federal Government's access to the financial records of individuals maintained by a financial institution. Section 1102(a) prohibits Government access to financial records unless one of five procedures is used and the records are "reasonably described." The procedure being used by the NHSC SP, NHSC S2S LRP, and NHHSP is described in Section 1104(a), which provides that an individual may authorize disclosure of his financial records if he signs a statement identifying the records and specifying the recipient and purpose of the disclosure. The relevant financial information collected through this application package complies with this requirement.

11. Justification for Sensitive Questions

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 must be reported to the Internal Revenue Service as income to the scholarship recipient. The Social Security number is also required by section 4 of the Debt Collection Act of 1982 (26 U.S.C. 6103) to permit collection of claims resulting from participants defaulting on the service obligation required under the scholarship award. The amount of scholarship support then becomes a debt owed the Federal Government.

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

The NHSC SP, NHSC S2S LRP and NHHSP obtain a Credit Bureau Report (CBR) as part of its application review process. The CBR is used to verify whether the applicant has a Federal judgment lien. The

Privacy Act Notification Statement in the Application and Program Guidance advises applicants that a CBR will be obtained.

12. Estimates of Annualized Hour and Cost Burden

In reviewing the application and forms for this request, BHW noticed that the “Post Graduate Training Form” was mistakenly included in the “NHSC Students to Service Loan Repayment Program Application” section in the 60 day FRN. The “Post Graduate Training Form” is already included in the “NHSC awardees/schools/post graduate training programs/sites” section and therefore was removed as a duplicate entry. In addition, the “Receipt of Exceptional Financial Need Form” is no longer used in the NHSC SP applications, so it was also deleted from the “NHSC Scholarship Program Application” section. Removing the “Post Graduate Training Form” decreases the overall burden of this information collection from 11,361.40 to 11,286.40.

Section 12A - Estimated Annualized Burden Hours

Burden Estimate:

NHSC Scholarship Program Application:

Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
Interested Applicant	NHSC Scholarship Program Application	1,889	1	1,889	2.00	3,778
Interested Applicant	Letters of Recommendation	1,889	2	3,600	1.00	3,778
Interested Applicant	Authorization to Release Information	1,889	1	1,889	0.10	188.90
Interested Applicant	Acceptance/Verification of Good Standing Report	1,889	1	1,889	0.25	472.25
Interested Applicant	Verification of Disadvantaged Background Status	547	1	547	0.25	136.75
Total		1,889*	--	9,992	--	8,353.9

**Certain documents are submitted by a subset of respondents consistent with program requirements.*

NHSC awardees/schools/post graduate training programs/sites:

Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
NHSC awardees and schools	Data Collection Worksheet	400	1	400	1.0	400
NHSC awardees and post graduate training programs	Post Graduate Training Verification Form	100	1	100	.50	50
NHSC awardees, schools, and sites	Enrollment Verification Form	600	2	1,200	.50	600
Total		600*	--	1,700	--	1,050

*Please note that the same group of respondents may complete each form as necessary.

NHSC Students to Service Loan Repayment Program Application:

Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
Interested Applicant	NHSC Students to Service Loan Repayment Program Application	200	1	200	2.0	400
Interested Applicant	Letters of Recommendation	200	2	400	1.0	400
Interested Applicant	Authorization to Release Information	200	1	200	.10	20
Interested Applicant	Acceptance/Verification of Good Standing Report	200	1	200	.25	50

Interested Applicant	Verification of Disadvantaged Background Status	70	1	70	.25	17.5
Total		150*	--	1070	--	887.5

*Certain documents are submitted by a subset of respondents consistent with program requirements.

Native Hawaiian Health Scholarship Program Application:

Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
Interested Applicant	Native Hawaiian Health Scholarship Program Application	310	1	310	2.0	620
Interested Applicant	Letters of Recommendation	310	2	620	.25	155
Interested Applicant	Authorization to Release Information	310	1	310	.25	77.5
Interested Applicant	Acceptance/ Verification of Good Standing Report	30	1	30	.25	7.5
Interest Applicant	Scholar Enrollment Verification Form	30	7.5	225	.50	112.5
Interested Applicant	Change in Program Curriculum Form	30	2	60	.25	15
Interested Applicant	NHHSP Graduation Documentation Form	30	1	30	.25	7.5
Total		310*	--	1585	--	995

*Certain documents are submitted by a subset of respondents consistent with program requirements.

For NHSC SP Applicants:

The number of NHSC SP applicants is estimated to average 1,889 per year for the next 3 years. Based on recent history, the NHSC SP will award approximately 200 multi-year scholarships each year for the next 3 years. Based on the information requested in the NHSC SP application and forms, it is estimated that it

will take an average of 3.6 hours to review the instructions and complete the application and forms for the Scholarship Program.

For NHSC Awardees/Schools/Post Graduate Training Programs/Sites:

These are all forms that will be used once the NHSC applicant is awarded and becomes a participant in the program. Participants must use the Enrollment Verification Form (also known as the Six Month Verification Form), which is submitted twice in a year. The Data Collection Worksheet is sent to participants' schools to be updated annually by the school and/or site. For the employment verification form, the schools and/or sites also provide this information. Based on the information requested in the forms, it is estimated that it will take an average of 2.00 hours to review the instructions and complete the forms for NHSC awardees, schools, post graduate training programs, and sites.

For NHSC S2S LRP Applicants:

The number of NHSC S2S LRP applicants is estimated to average 200 per year for the next 3 years. Based on recent history, the NHSC S2S LRP will award approximately 100 loan repayment awards each year for the next 3 years. Based on the information requested in the NHSC S2S LRP application and forms, it is estimated that it will take an average of 3.60 hours to review the instructions and complete the application and forms for the Scholarship Program.

For NHHSP Applicants:

The number of NHHSP applicants is estimated to average 310 per year for the next three years. Based on recent history, the NHHSP will award approximately 10 multi-year scholarships each year for the next 3 years. Based on the information requested in the scholarship application and forms, it is estimated that it will take an average of 3.75 hours to review the instructions and complete the application and forms for the NHHSP program.

Section 12B

Estimated Annualized Burden Costs

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Interested NHSC SP Applicant	8,353.9	\$14.65	\$122,384.64
Interested NHSC S2S LRP Applicant	887.5	\$14.65	\$13,001.88
Interested NHHSP Applicant	995	\$14.65	\$14,576.75

Health Professional School	400.00	\$45.87	\$18,348
Post Graduate Training Program	50.00	\$48.55	\$2427.50
Health Care Site	600.00	\$48.55	\$29,130
Total			\$199,868.77

The following assumptions were made in providing the estimates listed above. The approximate wage rates for interested applicants were determined by citing the mean hourly wage rates for “Healthcare Support Occupations” as provided through the Bureau of Labor Statistics (<https://www.bls.gov/oes/current/oes310000.htm>). An NHSC SP, NHSC S2S LRP, or NHHSP applicant may make about \$14.65 per hour as applicant employment status is mixed (i.e. applicants may be students and/or may be in the workforce). The school officials or administrators involved in the process may make an average of \$45.87 per hour as cited by the Bureau of Labor Statistics’ mean hourly wage rates for “Education Administrators, Postsecondary” (<https://www.bls.gov/ooh/management/postsecondary-education-administrators.htm>). Health profession instructors, program coordinators and/or directors who write recommendation letters, provide the Post-Graduate Training Verification letter, or sign off on employment verification forms could be making an average of \$48.55 per hour as cited by the Bureau of Labor Statistics’ mean hourly wage rates for “Medical and Health Service Managers” (<https://www.bls.gov/ooh/management/medical-and-health-services-managers.htm>).

As such, the combined total respondent cost for NHSC SP, NHSC S2S LRP, and NHHSP applications and forms (including both applicant and participant burden hours) would be \$199,868.77.

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

Other than their time, there is no cost to respondents.

14. Annualized Cost to Federal Government

The average annual costs to the government for collecting the NHSC SP, NHSC S2S LRP, and NHHSP applications and forms are as follows:

Instrument	GS-Level/Base Pay Rate	Project Time per FTE	Number of FTEs	Total Annual Cost
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NHSC Scholarship Program	\$94,970.00 (GS-12, Step 4)	.35	8	\$265, 916.00
NHSC Students to Service Loan Repayment Program	\$94,970.00 (GS-12, Step 4)	.20	10	\$189,940.00
Total				\$455,856.00

Instrument	GS-Level/Base Pay Rate	Project Time per FTE	Number of FTEs	Total Annual Cost
Native Hawaiian Health Scholarship Program (BHW)	\$86,335 (GS-12, Step 1)	.10	2	\$17,267.00
Native Hawaiian Health Scholarship Program (POL)	\$46,656.80	.33	5	\$76,983.72
Total				\$94,250.72

Processing of the NHSC SP and NHSC S2S LRP applications and supporting forms is handled internally through the BHW Business Management Information System Solution (BMISS) and by NHSC SP and S2S LRP staff. There are a total of 10 FTEs involved in the processing of the applications (8 FTEs for NHSC SP and NHSC S2S LRP and 2 additional FTEs only for NHSC S2S LRP). It is estimated that a base pay rate of \$94,970.00 (equivalent to a GS-12, Step 4) per individual will be received in exchange for a 35% time commitment on NHSC SP and a 20% time commitment on NHSC S2S LRP. The cost for staff to process the applications and facilitate the NHSC SP application process for 8 GS-12, Step 4 employees at .35 full-time equivalent (FTE) rate is \$265,916. In addition, the cost for staff to process the applications and facilitate the NHSC S2S LRP application process for 10 GS-12, Step 4 employees at .20 full-time equivalent (FTE) rate is \$89,940.00. The total estimated annual cost to the Government for the NHSC LRP application and supporting forms is \$455,856.00

The processing of the NHHSP application and forms are handled both internally by BHW staff, and externally (established through a Cooperative Agreement) with Papa Ola Lokahi (POL). The variables used to estimate the annualized cost to the government are contained in the table above. There are 7 FTEs (2 from BHW and 5 from POL) involved in the processing of the applications and forms. The BHW FTEs receive a base pay rate of \$86,335 (equivalent to a GS-12, Step 1) per individual, in exchange for working on the NHHSP for 10% of the project time. The POL FTEs receive a base pay rate of approximately \$46,656.80 per individual for 33% of the project time. The total annualized cost to the government to review the NHHSP application and forms is \$94,250.72.

The grand total of costs to the government for all the instruments will be \$550,106.72.

15. Explanation for Program Changes or Adjustments

The current hour inventory is for 8,074 hours and this request is for 11,286.40. The estimated burden is higher than the previously approved information clearance request. The annual estimated burden for this collection is up to 3.6 hours for application to the NHSC SP, the same for completion of forms from NHSC awardees, schools, post graduate training programs, and sites at 2 hours, up to 3.60 hours for application to the NHSC S2S LRP, and up to 3.75 hours for application to the NHHSP.

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

There are no plans for tabulation, statistical analysis, or publication of data requested.

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

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.