

**(EACFMAF) Educational Assistance for Certain Former Members of the Armed Forces**

**OMB Control Number 2900-0793**

**VA Forms: 10-0491, 10-0491A, C--K, M**

**A. JUSTIFICATION**

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

A collection of information is necessary to implement the Department of Veterans Affairs (VA) Educational Assistance for Certain Former Members of the Armed Forces (EACFMAF) that was authorized under section 246 of Public Law 115-141, Consolidated Appropriations Act 2018. The passage of this legislation allows VA to establish a pilot program that will provide educational assistance through the Health Professional Scholarship Program (HPSP) to certain former members of the Armed Forces for education and training leading to employment as a VA physician assistant, the EACFMAF program. This program will help address the VA health care workforce needs by increasing the PA workforce. The 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. §7611 (HPSP), for VA, to determine the applicant's eligibility to receive a scholarship award.

The EACFMAF program will be included in a currently approved collection under OMB Control Number 2900-0793. In order to efficiently respond to the described recent legislation, VHA is utilizing these existing forms (with minor modification) to administer the EACFMAF program.

**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 Educational Assistance for Certain Former Members of the Armed Forces (EACFMAF) Program. The EACFMAF program awards scholarships to students receiving education or training for the Physician Assistant discipline to assist in providing an adequate supply of such personnel for VA and for the United States.

**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 a prior submission, VHA 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. 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.**

The Notice of Proposed Rulemaking (NRM) was published in the Federal Register on July 27, 2020 (Volume 85, Number 144, Pages 45135-45139).

We will report the number of comments received in response to the NPRM after the 60-day comment period has closed.

**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.

**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 total numbers of respondents, frequency of responses, annual hour burden, and explanation for each form are reported as follows:**

<b>(EACFMAF) Educational Assistance for Certain Former Members of the Armed Forces.</b>	<b># of respondents</b>	<b># of annual responses</b>	<b>Minutes to Complete Forms</b>	<b>Total Number of Hours</b>
Individuals (All Applicants)	100	1	22,300 total min	~ 372
Individuals (Applicants selected to receive scholarship award)	25	1	2,455 total min	~ 41
<b>Total for EACFMAF</b>				<b>~ 413 hours</b>

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**

**Educational Assistance for Certain Former Members of the Armed Forces (EACFMAF)**

**APPLICANTS**

VA Forms	# of respondents	x # of responses	Equals	x # of min per form	Equals (min)	÷ by 60 =	Number of Hours
10-0491g- Application	100	1	100	60	6000		100
10-0491- Academic Verification	100	1	100	60	6000		100
10-0491e- Evaluation & Recommendation	100	2	200	50* (x2)	10,000		167
10-0491a- Addendum to Application	30 (~33%)	1	30	10	300		5
<b>TOTAL</b>				230*	22,300		<b>372 hrs</b>

**APPLICANTS SELECTED TO RECEIVE A SCHOLARSHIP**

VA Forms	# of respondents	x # of responses	Equals	x # of min per	Equals (min)	÷ by 60 =	Number of Hours
10-0491f- Agreement for the EACFMAF	25	1	25	15	375		6.25
10-0491m- Mobility Agreement	25	1	25	10	250		4.17
10-0491k- VA Scholarship Offer Response	25	1	25	10	250		4.17
10-0491i- Notice of Change and/or Annual Academic Status Report	25	1	25	20	500		8.33
10-0491h- Notice of Approaching Graduation	25	1	25	10	250		4.17
10-0491d- Education Program Completion Notice/ Service Obligation Placement	25	1	25	20	500		8.33
10-0491j- Request for Deferment for Advanced Education	8 (30%)	1	8	10	80		1.33
10-0491c- Annual VA Employment/ Deferment Verification	25	1	25	10	250		4.17
<b>TOTAL</b>				105	2,455		<b>40.92</b>
<b>GRAND TOTAL (Applicant + Scholarship Hours)</b>				335			<b>412.92 ~ 413 hours</b>

**Note:** The estimated 100 respondents include the 25 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. The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. In accordance with the Bureau of Labor Statistics (BLS) May 2019 Occupational Wage Code Median Hourly, 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](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, 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 for completing the information collection.

VHA estimates the total annualized cost to all respondents to be \$10,622.36 (413 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.**

EACFMAF Health Professional Scholarship Program (HPSP)

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 new collection and all burden hours are considered a program increase.

**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.