Health Resources and Services Administration

Substance Use Disorder Treatment and Recovery (STAR) Loan Repayment Program (LRP) OMB Control No. 0906-XXXX

Supporting Statement A

1. <u>Circumstances Making the Collection of Information Necessary</u>

This is a request for Office of Management and Budget (OMB) approval for a new Substance Use Disorder Treatment and Recovery (STAR) Loan Repayment Program (LRP) application. Substance Use—Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities Act or the "SUPPORT for Patients and Communities Act 2020 requires an STAR LRP application. The legislative authority stating the need for the information collected in this application is found in Substance Use—Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities Act or the "SUPPORT for Patients and Communities Act 2020.

The Bureau of Health Workforce (BHW) in the Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services (HHS) will administer the STAR LRP. Under the STAR LRP, HHS will enter into contracts with selected primary care health professionals including behavioral health providers and paraprofessionals. In return, HHS will assist the awardees in their repayment of outstanding qualifying educational loans. Under the legislation, HHS agrees to provide up to \$120,000.00 in loan repayment in exchange for 6 years of full-time eligible employment.

2. Purpose and Use of Information Collection

The need and purpose of this information collection is to obtain information that is used to assess an STAR LRP applicant's eligibility and qualifications for the program, and to obtain information for eligible site applicants. Individual interested in participating in the STAR LRP must submit an application to the program in order to participate, and health care facilities located in any Health Professional Shortage Areas (HPSAs) with Mental Health and Psychosocial Support (MHPSs) or with high overdose rate must submit a Site Application to determine the eligibility of sites to participate in the STAR LRP. The STAR LRP application asks for personal, professional and financial information needed to determine the applicant's eligibility

to participate in the STAR LRP. In addition, applicants must provide information regarding the loans for which repayment is being requested.

3. <u>Use of Improved Information Technology and Burden Reduction</u>

This information collection activity will be fully web-based. The STAR LRP Application, application instructions and program information will leverage existing application database through the BHW Portal available at https://programportal.hrsa.gov/extranet/landing.seam. Additionally, information about the program will be available on the BHW website https://www.hrsa.gov/about/organization/bureaus/bhw/index.html. The STAR LRP Site Application will use an interactive, online-based application that is fully accessible through the National Health Service Corps (NHSC) web site at http://nhsc.hrsa.gov/sites/.

4. Efforts to Identify Duplication and Use of Similar Information

The information requested in the STAR LRP Application and the Site Application are specific to the applicant and unique to this program. The STAR LRP Site Application will be the only known mechanism for collecting site specific information that can be used for determining site eligibility.

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 the STAR LRP applicants necessitates the collection of required data prior to HHS entering into a contract for repayment of qualifying education loans. In the absence of collecting these data, review, selection, and approval of qualified applicants cannot be carried out. The STAR LRP requests the information once during the application cycle.-

The selection process for STAR LRP sites necessitates the collection of required data prior to STAR LRP participants being allowed to serve at eligible sites. Pending availability of additional funds, approved sites may be required to recertify their eligibility to ensure substance use disorder (SUD) services are being rendered and the desired population is receiving care.

If the information were collected less frequently, the STAR LRP could not adequately evaluate sites and determine their eligibility for STAR LRP participant placement or transfer.

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

This information collection is consistent with 5 CFR 1320.5 (d)(2).

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 June 4, 2020, vol. 85, No. 108; pp. 34454-34456. There were no public comments.

Section 8B:

The program has surveyed four partnering stakeholders in 2020 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 payments or gifts.

10. Assurance of Confidentiality Provided to Respondents

Data collected on the individual STAR LRP Application are stored in a system of records as defined under the Privacy Act of 1974. Information provided on each selected application will be maintained for at least 2 years and up to 10 years to permit the monitoring 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 LRP 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 Ouestions

Questions regarding race and ethnicity are asked in the online application; however, responses to these questions are optional. The disclosure of the applicant's Social Security Number (SSN) is required by Section 4 of the Debt Collection Act of 1982 (26 U.S.C. 6103) and the applicant provides this information on his/her lender statement(s). The disclosure of the SSN is required for participation in the program, since the amounts repaid to lenders must be reported to the Internal Revenue Service as "other income" on IRS Form 1099. Safeguards are followed concerning

the use of the SSN in the Privacy Act of 1974 (5 U.S.C. 552a note).

12. Estimates of Annualized Hour and Cost Burden

12A. Estimated Annualized Burden Hours

Form Name	Number of Respondents	Number of Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
STAR LRP Application	300	1	300	.50	150
Authorization for Disclosure of Loan Information Form	300	1	300	.50	150
Privacy Act Release Authorization Form	300	1	300	.50	150
Employment Verification Form	300	1	300	.50	150
Site Application	400	1	400	1	400
Total	1,600		1,600		1000

The program estimates that the number of STAR LRP applicants/respondents will average approximately 300. Each applicant must complete an online application once. The application consists of general information (name, address, school attended, degree obtained, employer, etc.) and information for each loan to be repaid. Information from different applicants may vary; however, it appears that the burden estimates for the forms remain reasonable based on consultation with previous respondents.

12B.

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Type of	Total	Hourly	Total
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Respondent	Burden Hours	Wage Rate	Respondent Costs
STAR LRP Applicants	600	*\$96.58	\$57,948.00
Health Care Facility	400	*\$51.99	\$20,796.00
Total	1000		\$78,744.00

^{*}Based on Family and General Practitioners data at http://www.bls.gov/oes/current/oes_nat.htm#29-0000 and Medical and Health Service Manager data at http://www.bls.gov/bls/blswage.htm

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

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

14. Annualized Cost to Federal Government

Instrument	Base Pay Rate	Project Time per FTE	Number of FTEs	Total Annual Cost
NHSC Loan Repayment Program Online Application Contract	\$86,335/ (GS-12, Step 1)	.25	26	\$561,177.5
NHSC Site Application	\$86,335/ (GS-12, Step 1)	.025	41	\$88,493.4
Total				\$649,671

Processing of the NHSC LRP applications and supporting forms are handled internally through the BHW Business Management Information System Solution (BMISS) and by HRSA staff. There are 26 full- time equivalent (FTEs) involved in the processing of the applications. The cost for staff to process the applications and facilitate the loan repayment process for 23 GS-12, Step 1 employees at .25

FTE rate is \$561,177. The total estimated annual cost to the Government for the STAR LRP application and supporting forms is \$561,177.

HRSA regional staff will review and process the STAR LRP Site Application with an average pay rate of \$88,493 (equivalent to a GS-12, Step 1 at 2020 pay rate level). Approximately 41 DRO staff participate in reviewing site applications.

15. Explanation for Program Changes or Adjustments

There are no changes as this is a new program.

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

No exemption is requested.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.