

## SUPPORTING STATEMENT A

### SPECIALTY EDUCATION LOAN REPAYMENT PROGRAM (SELRP) – AQ63

OMB CONTROL NUMBER: 2900-0879

#### A. JUSTIFICATION

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

Section 303 of Public Law 115-182, the VA Maintaining Internal Systems and Strengthening Integrated Outside Networks Act of 2018, or the VA MISSION Act of 2018, amended title 38 of the United States Code (U.S.C.) by establishing new sections 7691 through 7697 and created a new student loan repayment program known as the Specialty Education Loan Repayment Program (SELRP). The SELRP will serve as an incentive for physicians starting or currently in residency programs, in medical specialties for which VA has determined that recruitment and retention of qualified personnel is difficult, to work for VA at VA facilities that need more physicians with that medical specialty.

The purpose of SELRP is to award loan repayment to recent medical school graduates or individuals with more than two years remaining in a medical residency program in VA's most critically needed specialties in exchange for service at a VA medical facility upon completion of residency requirements. SERLP authorizes VA to provide for the payment of the principal, interest, and related expenses of a loan obtained by an individual who is participating in the program for all educational expenses (including tuition, fees, books, and laboratory expenses). A collection of information is necessary to implement SELRP; these forms are needed to review the applicants' information, education loan indebtedness and to determine the eligibility of each candidate. The program is a multi-year program, during which time program participants will transition from non-VA employees and to permanent VA employees. These programs will help address VA health care workforce needs.

Section 303 of the VA MISSION Act of 2018 did not establish an application procedure for the SELRP. To maintain consistency in the application process of similar VA scholarship programs and to ease the implementation such programs by VA personnel, VA will mirror proposed § 17.528 to current § 17.643, Application for the Program for Repayment of Educational Loans for Certain VA Psychiatrists (PREL.) Consistent with § 17.643(a), proposed paragraph § 17.528(a) will state that a complete application for the SELRP consists of a completed application, letters of reference, and personal statement.

**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.**

Approval of this collection of information is required to properly adjudicate and implement the requirements of the MISSION Act. Information will be collected from recent medical or osteopathic school graduates and medical school residents with two or more years remaining in residency who want to apply for the SELRP. VA will use this information to evaluate and select qualified candidates to participate in this program.

**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.**

In accordance with the Government Paperwork Elimination Act (GPEA), this collection meets the established goals, as respondents are permitted to submit information electronically (as one form of “written” notice). Electronic versions of these written notices will reduce the amount of outgoing paper from the agency. Similarly, such an adjustment will reduce the costs acquired from printing and storage of hard copy forms, postage, and hours required in delivering these forms to the public.

**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.**

The information gathered from respondents will be unique and not readily available from other VA sources, and there would be no duplication of information collected.

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

These are applications for individual benefits, and small businesses or other small entities are impacted by the information collection only to the extent that they provide verification of an applicant’s status. Every effort has been made to minimize the burden to small businesses by keeping questions simple and to an absolute minimum.

**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.**

Failure to collect this information would prohibit VA from properly implementing the requirements of section 303 of the MISSION Act with regard to SELRP.

**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 Information Collection Activity was published as part of a proposed rule, RIN 2900-AQ63, in the Federal Register on December 26, 2019 (Volume 84, Number 247, Pages 70908-70913). VA received four comments in response to this notice, which did not affect or result in any changes to the rule or information collection.

In addition, the notice of Proposed Information Collection Activity was published as part of the final rule, RIN 2900-AQ63, in the Federal Register on July 29, 2020 (Volume 85, Number 146, Pages 45532-45537).

**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 Federal Register notice.

**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 collected on these forms or notices is protected by the Privacy Act of 1974, VA confidentiality statutes 38 USC § 5701 and 38 USC § 7332 and 45 CFR Parts 160 and 164, Health Insurance Portability and Accountability Act. Respondents are informed that the information collected will be included as a part of the system of records identified as 54VA16, Health Administration Center Civilian Health and Medical Program Records-VA as set forth in the 2005 Compilation of Privacy Act Issuances via online GPO access at <http://www.gpoaccess.gov/privacyact/index.html> and disclosures made in accordance with the statute.

**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 number of respondents, frequency of responses, annual hour burden, and explanation for each form is reported as follows:**

<b>VA Form 10-255 series</b>	<b>No. of Respondents</b>	<b>x No. of Responses</b>	<b>x No. of Minutes per Response</b>	<b>Minutes ÷ 60</b>	<b>= No. of Annual Hours</b>
Application	200	1	40	8000	133.33
Residency Program Status Verification	200	1	10	2000	33.33
Education Loan Verification	200	1	15	3000	50.00
Mobility Agreement	200	1	10	3000	33.33
Participant Agreement	200	1	10	2000	33.33
<b>TOTALS</b>	<b>200*</b>		<b>90</b>	27,000 ÷ 60	<b>~ 283 hours</b>

\*Approximately 200 applicants annually will complete all five forms to apply to the program.

**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.

**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. In accordance with the Bureau of Labor Statistics (BLS) May 2019 Occupational Wage Code Median Hourly, the mean hourly wage is \$27.22 based on the BLS wage code – "29-9000 Other Healthcare Practitioners." This information was taken from the following website: [https://www.bls.gov/oes/2019/may/oes\\_nat.htm](https://www.bls.gov/oes/2019/may/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. VHA estimates the total annualized cost to respondents to be \$8,166.00 (300 burden hours x \$27.22 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.**

**FEDERAL COST:** The estimated annual cost to the Federal government is \$12,187.

#### **Section 1 - Manpower Estimate**

<u>Grade Level</u>	<u>Hourly Rate</u>	<u>Benefits Percent</u>	<u>Salary + Benefit Rate</u>	<u>Approx. Number of Hours</u>	<u>Subtotal</u>
GS-11 (DC)	\$37.91	34.00%	\$ 50.80	150.0	\$7,620
GS-12 (DC)	\$45.44	34.00%	\$ 60.89	75.0	\$4,567
<b>Subtotal - Manpower</b>				<b>225.0</b>	<b>\$12,187</b>

**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 will include the expiration date on all forms.

**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.