



DATE: September 28, 2021

TO: Sharon Block, Acting Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget

FROM: Diana Espinosa, Acting Administrator

SUBJECT: DECISION - Expedited Review- Reporting Data Elements for Rural Health Clinic COVID-19 Testing and Mitigation Program recipients

ACTION REQUESTED

The Health Resources and Services Administration (HRSA) is requesting an expedited review to modify one form currently approved under the Office of Management and Budget (OMB) #0906-0056 (Rural Health Clinic (RHC) COVID-19 Reporting Portal). This revised data report was developed by the HRSA Federal Office of Rural Health Policy (FORHP) to support a requirement to monitor and report on funds distributed under the fiscal year 2021 American Rescue Plan Act, Public Law 117-2. Upon receipt of funds, recipients attested to terms and conditions that, among other obligations, required each recipient submit reports to the Department of Health and Human Services.

RECOMMENDATION

Approval of the RHC COVID-19 Reporting Portal is time-sensitive to meet federal reporting requirements as outlined in the American Rescue Plan Act legislation. Because of the urgent nature of the COVID-19 pandemic response, combined with the quick disbursement of and the short-term duration of this funding (one time disbursement in June 2021 of 2-year funds), it is important for HRSA to obtain data as quickly as possible.

EXECUTIVE SUMMARY

The American Rescue Plan Act appropriated \$460 million to RHCs to support COVID-19 testing, COVID-19 mitigation, and COVID-19 testing and mitigation related expenses. HRSA issued funding as one-time payments to approximately 2,300 organizations identified by their Tax Identification Number based on the number of certified RHCs they operate, providing \$100,000 per clinic site. HRSA FORHP supports a data-reporting module – the RHC COVID-19 Reporting Portal to collect information on RHC COVID-19 Testing and Mitigation (RHCCTM) Program funded activities. The data will allow HRSA to ensure RHC recipients are meeting the terms and conditions of their funding, while providing HRSA with information on

the effectiveness of funds distributed through this Program.

Notable Timing Factors:

The RHC COVID-19 Reporting Portal collects monthly, aggregate data from funded organizations. Funded organizations provide basic identifying information, report on the number of and location of testing sites, indicate how they used the funds, and report the total number of COVID-19 tests and the number of COVID-19 tests with a positive result. The RHC COVID-19 Reporting Portal is located on a dedicated website supporting secure data storage, <http://www.rhccovidreporting.com/>. HRSA intends to ask for responses to some measures (i.e., testing and testing related purposes; mitigation and mitigation related purposes) quarterly, though respondents may update the data should any of that change during the duration of the quarter. Funded organizations may optionally report on the number of at-home COVID-19 tests (i.e., home collection; direct-to-consumer; over-the-counter).

Noteworthy Elements about Equity:

RHCs are critical partners in closing health equity gaps, especially related to COVID-19. RHCCTM Program funding helps RHCs keep and expand COVID-19 testing and mitigation services for people in rural parts of the country, including those who live medically underserved communities.

The goal of our data collection is to collect the minimum data necessary to monitor and support the proper and effective use of funds, at a scale commensurate with the amount of funding received per RHC site. To assess the burden, we gathered data on the anticipated number of respondents and responses based on internal data. We assessed average burden hours based on input gathered from RHCs by the technical assistance provider, the National Association of Rural Health Clinics. RHCs sampled reported response times of approximately 20 minutes (.33 hours) per response.

ANTICIPATED REACTION

The RHCCTM Program builds on the May 2020 RHC COVID-19 Testing Program and will use a similar data collection strategy. For the previous program, HRSA received emergency authorization for rapid data collection and then completed the standard information collection clearance process. No public comments expressed concern about the data collection burden during the clearance process.

The RHC COVID-19 Reporting Portal provides data for periodic RHCCTM Program inclusion in the Biden/Harris Administration Cabinet Report. HRSA anticipates the additional reporting measures will receive a positive response.

ROLLOUT

HRSA intends to start requiring data collection as soon as possible, no later than October 1, 2021. Data from RHC COVID-19 Reporting Portal will be extracted weekly to allow for analysis of the use of RHCCTM Program funding. RHCCTM Program data collection ends January 31, 2022.

Diana Espinosa



Attachments:

- TAB A: PRA Emergency Clearance Package
- *Supporting Statement A* document details this request.
 - *Data collection form to be revised.* We have included the current versions in PDF and the revised versions in Word documents to show the track changes.
- The attachments are as follows:
- FORM – HRSA FORHP COVID-19 Data Report – revised
 - FORM – HRSA FORHP COVID-19 Data Report – track changes