



DEFENSE HEALTH AGENCY
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OGC-AC

January 31, 2022

Mr. Dominic Mancini
Deputy Administrator
Office of Information and Regulatory Affairs (OIRA)

RE: DHA Form 780 Review

Dear Mr. Mancini:

This letter is in reference to the pending review of DHA Form 780 (OMB Control Number 0720-0005). The form is used by KePRO (Keystone Peer Review Organization), a government contractor, to determine the qualifications of medical professionals in order to ensure they are properly qualified to rendering medical necessity determinations appropriate to a particular subject matter under review. This information is necessary so that KePRO can perform its basic function as detailed in the Tricare Operations Manual (TOM) Chapter 12, Section 3. The form has been in use for many years and until last year there had been no significant objections or questions raised by the Office of Management and Budget (OMB) Desk Officer concerning its clarity or necessity of purpose. However, last year the desk officer raised a number of issues claiming medical professionals would encounter confusion as to what information is required. An exchange took place with the then Director of Appeals Hearings and Claims Collection which resulted in a one-year extension of the review process. I have been assigned by the new Director of Appeals, Hearings, and Claims Collection to review the pending comments and provide additional input in response to the WHS comments from last year.

The following is a supplemental response to the OMB Desk Officer comments:

1. Desk Officer Comment: Compared to the old version of the form, the new version of the form removed the header "Medical Education" and instead now says "Medical Information." To me, the new version of the form is confusing because it is not clear to me, for example, if the respondent is supposed to tell you what state they are licensed in or what state the medical school they attended was located.

Response: Concur. The draft form will be amended to change the header to "Medical Experience" from "Medical Information."

2. Desk Officer Comment: The form seems very physician-focused, despite the supporting statement saying that it will be used by a number of healthcare professionals. Is it possible to consider adding the language to the form that indicates it is used by multiple professionals, so that folks don't believe that have received the wrong form?

Response: No change is necessary. The form asks for Degree, Year of Degree, School, and License Type. These categories include all medical professionals and are not limited exclusively to doctors. After speaking with representatives at KePRO they report there has been no indication of confusion on the part of healthcare professionals in filling out the form. We do not concur that a change for the sake of clarity is necessitated by the existing language. Those in the medical profession understand their credentials without the need for further explanation.

3. Desk Officer Comment: For the education information, it may be worth considering allowing the respondent to report additional professional education. For example, a nurse's eligibility for license may derive from a bachelor's or master's degree in nursing. However, they may also have a PhD in Nursing, which would be relevant to their qualifications, but not necessarily sufficient for licensure. Similarly, generally speaking, a master's degree in social work is required for clinical licensure, and there are those who earn doctorates in social work who are not eligible for licensure as a social worker because they do not have the master's degree. So, I assume DoD would generally want to know both 1. The degree that confers eligibility for licensure, and 2. Additional professional training in the field, even if not required for licensure per se. A final example is a dentist earns a DDS or DMD for eligibility for licensure. However, they may earn a post-doctoral Master's degree in a field/specialty such as orthodontics. I assume, then, that DoD would want to know about both the first professional degree (DDS/DMD) and the specialty training.

Response: No change is necessary. The form has an entry for "Specialties/Other Relevant Education", which would allow an applicant to include all relevant educational information. DoD does indeed want to know the applicant's educational history and the section entitled "Specialties/Other Relevant Education" covers this.

4. Desk Officer Comment: For certain fields, you may wish to ask more specifically about what type of license. For example, advanced practice nursing versus just RN, LCSW or LICSW versus LSW or LMSW (although this varies by state).

Response: No change is necessary. There is no need to specify license type as Block 4 section d. of the form asks for, "d. License Type/State/Year", medical professionals have no difficulty in understanding this block requires their specific type of license. Additionally, section g. "Type of Practice", permits expansion if there is a need to provide additional clarification.

5. Desk Officer Comment: How does DoD use the "year of birth" information?

Response: Concur. A query to KePRO indicates they sometimes use the applicant's age to distinguish medical professionals who applied with the same name. However, distinctions between applications can be achieved using licensure information so we concur in eliminating this block.

6. Desk Officer Comment: I am not seeing the following information from 5 CFR 1320.8(b)(3):

(iv) Whether responses to the collection of information are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority); (v) The nature and extent of confidentiality to be provided, if any (citing authority);

Response: Concur. This information can be included within the section under the header of the form. Filling out the form is voluntary, but declining to do so will result in the applicant being ineligible for being hired.

Sincerely,

/s/ Christopher D. Jung
Christopher D. Jung, J.D., L.L.M.
Chief, Appeals Branch
Defense Health Agency
Office of General Counsel