**DATE:** May 01, 2023

**TO:** [Name], OMB Desk Officer

**FROM:** [Name], HRSA Information Collection Clearance Officer

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**Request**: The Health Resources and Services Administration (HRSA) Provider Relief Bureau requests approval for changes to the COVID-19 Provider Relief Fund (PRF) and the American Rescue Plan (ARP) Rural Reporting Activities (OMB 0915/0906-0068 expiration date 01/31/2026).

**Purpose**: This request aims to update the Information Collection documents to reflect the changes made in the Bureau’s Post-Payment Notice of Reporting Requirements. The notice published on April 7, 2023 superseded the Post-Payment Notice of Reporting Requirements released on October 27, 2022. Specifically, the reporting requirements were updated to include Period 8 (i.e., payment received period from July 1, 2023, to December 31, 2023) and Period 9 (i.e., payment received period from January 1, 2024, to June 30, 2024), as well as updating the associated Periods of Availability of Funds and Reporting Time Periods for Periods 8 and 9. It also included clarifying information regarding the use of PRF and ARP Rural payments for lost revenues after the COVID-19 Public Health Emergency ends. The COVID-19 Public Health Emergency ends on May 11, 2023.

This memo explains the changes and supporting rationale.

**Changes:** There are no changes to the instrument used to collect the information required; however, there is a change in the number of reporting periods required by the agency to conduct effective program oversight. These changes also result in changes within the burden estimates.

Table A includes the documents that received the changes, the information that was altered/added, a description of the changes, and the rationale for the change. Also attached are the Provider Post-Payment Notice of Reporting Requirements – April 2023 (Attachment 1)

Estimates of Annualized Hour Burden

Given that the federal Public Health Emergency (PHE) for COVID-19, declared under Section 319 of the Public Service Act, will expire at the end of the day on May 11, 2023, the changes mentioned above are necessary to conduct agency operations.

**Time Sensitivity**: The data collection changes must be completed in a timely manner to ensure that the survey data collection schedule will not experience significant delay. Approval of these changes is needed by June 1, 2023, to implement associated reporting portal updates and to prepare for the timely collection of data critical to HRSA researchers.

**Burden:** These changes included herein do not substantially change the estimated reporting burden for providers. The reporting burden formula is the same for each reporting period; however, we have added additional reporting periods to account for funding anticipated to be distributed in the second half of 2023 and the first half of 2024. These additional reporting periods will allow HRSA to capture data to conduct effective program oversight and to (1) assess whether recipients have met statutory and programmatic requirements, (2) conduct audits, (3) gather data required to report on findings with respect to the disbursements of PRF payments, and (4) support program evaluation. HRSA staff will also use information collected to identify and report on trends in health care metrics and expenditures before and during the allowable period for expending PRF payments. If the information is not collected, HRSA’s ability to conduct review and audits on appropriate entities will be jeopardized if data that informs the program review and audit strategies cannot be collected. Finally, effective program evaluation will be severely limited and the program itself will be unable to operate in a fiscally prudent manner.

**PROPOSED CLARIFICATIONS AND NON-SUBSTANTIVE CHANGES:**

## Table A

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| --- | --- | --- | --- |
| **Program Document** | **Altered Information** | **Description of Change** | **Rationale** |
| Post-Payment Notice of Reporting Requirements | \*Public Health Emergency end date May 11, 2023 included  \*Additional reporting periods included | Key updates include the addition of reporting periods 8 and 9 (including the applicable payment received period and period of availability dates), and additional guidance concerning the use of PRF and ARP Rural payments for lost revenues incurred within the period of availability up to the end of the Public Health Emergency. | The latest notice approved by OMB supersedes all previous Notices of Reporting Requirements. |

As a result of the additional reporting periods, HRSA will meet its responsibility to oversee the mandate regarding reporting requirements that will facilitate appropriate oversight of recipients’ use of funds. HRSA will also be able to provide reports to Congress and other stakeholders on the use of $178 billion in PRF funds and $8.5 billion in ARP funds. PRF and ARP recipients will be able to fulfill the statutory reporting requirement.

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| Form Name | Number of Respondents | Number of Responses per Respondent | Total Responses | Average Burden per Response (in hours) | Total Burden Hours |
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**Attachments:**

1. Post-Payment Notice of Reporting Requirements posted April 7, 2023