**Health Resources and Services Administration**

**Substance Use Disorder Treatment and Recovery (STAR)**

 **Loan Repayment Program (LRP) and the Pediatric Specialty Loan Repayment Program (LRP)**

**OMB Control No. 0906-0058 - Revision**

**Supporting Statement A**

1. **Circumstances Making the Collection of Information Necessary**

This is a request for Office of Management and Budget (OMB) approval for the revision of the Substance Use Disorder Treatment and Recovery (STAR) Loan Repayment Program (LRP) to add the new Pediatric Specialty Loan Repayment Program (LRP) application. The STAR LRP is authorized by Section 781 of the PHS Act (42 U.S.C. § 295h) and received $40,000,000 under the Consolidated Appropriations Act, 2023. The Pediatric Specialty LRP is authorized by Section 775 of the PHS Act *(42 U.S.C. § 295f)* and received $10,000,000 under the Consolidated Appropriations Act, 2023. Additionally, the Further Consolidated Appropriations Act, 2022 included $5,000,000 for the Pediatric Specialty LRP. The current OMB approval number for the STAR LRP application (including the Authorization for Disclosure of Loan Information Form, the Privacy Act Release Authorization Form, and the Employment Verification Form) is OMB No. 0906–0058, expiring on 12/31/2023. 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) administers the STAR LRP and will administer the new Pediatric Specialty LRP.

Under the STAR LRP, HHS will continue to enter into contracts with selected individuals (awardees) including behavioral health providers and paraprofessionals who are working in a fulltime substance use disorder treatment job that involves direct patient care in either a Mental Health Professional Shortage Area (HPSA), or a county (or municipality, if not contained within any county) where the mean drug overdose death rate per 100,000 people over the past three years for which official data is available from the State, is higher than the most recent available national average overdose death rate per 100,000 people, as reported by the Centers for Disease and Control (CDC). In return for working in such areas and specialties of need, HHS will assist the awardees in their repayment of outstanding qualifying educational loans. Under the legislation, HHS agrees to provide up to $250,000.00 in loan repayment in exchange for 6 years of full-time eligible employment.

Under the Pediatric Specialty LRP, HHS will provide the repayment of education loans to pediatric medical subspecialist, pediatric surgical specialist, and child and adolescent mental and behavioral health care providers working full-time in or serving a HPSA, medically underserved area (MUA), or medically underserved population (MUP). In return for working in such areas and specialties of need, HHS will offer up to $100,000 in return for 3 years of full-time service obligation through the Pediatric Specialty LRP.

1. **Purpose and Use of Information Collection**

The need and purpose of this information collection is to obtain information that is used to assess an applicant’s eligibility and qualifications for the STAR LRP and the Pediatric Specialty LRP programs, and to obtain information for eligible facilities or sites. Individuals must apply to the STAR LRP or the Pediatric Specialty LRP to participate. Additionally, health care facilities located in a high overdose death rate area or mental health HPSAs must submit the facility type and the site point(s) of contact(s) for HRSA to determine the facility’s eligibility to participate in the STAR LRP. Similarly, sites located in or serving a HPSA, MUA, or MUP must submit the site type and the site point(s) of contact(s) for HRSA to determine the sites’ eligibility to participate in the Pediatric Specialty LRP. The STAR LRP and the Pediatric Specialty LRP application asks for personal, professional, and financial information needed to determine the applicant's eligibility to participate in either of the programs. In addition, applicants must provide information regarding the loans for which repayment is being requested.

1. **Use of Improved Information Technology and Burden Reduction**

This information collection activity will be fully web-based. The STAR LRP and the Pediatric Specialty LRP application, application instructions and program information will leverage the existing application database through the BHW Portal available at <https://programportal.hrsa.gov/extranet/landing.seam>. Additionally, information about each program will be available on the BHW website <https://www.hrsa.gov/about/organization/bureaus/bhw/index.html.> Facilities or sites approved for the STAR LRP and/or the Pediatric Specialty LRP will be online-based and fully accessible through https://connector.hrsa.gov/connector/. HRSA will approve facilities for the STAR LRP if the facility submits to HRSA the facility type and the recruitment contact(s) through the [BHW Customer Service Portal](https://programportal.hrsa.gov/extranet/landing.seam); and be located in either a county (or municipality, if not contained within any county) where the mean drug overdose death rate per 100,000 people over the past three years for which official data is available from the State, is higher than the most recent available national average overdose death rate per 100,000 people, as reported by the CDC, or in a mental health HPSA. Similarly, HRSA will approve and activate sites for the Pediatric Specialty LRP if: (1) The facility is already approved for the National Health Service Corps, Nurse Corps, or STAR LRP and located in or serves a HPSA, MUA or MUP; or (2) During the Pediatric Specialty LRP application cycle, the facility submits to HRSA the site type and the point of contact(s), (POC) to PS\_LRP\_Sites@hrsa.gov. PS\_LRP\_Sites@hrsa.gov.

1. **Efforts to Identify Duplication and Use of Similar Information**

The information requested in the STAR LRP, and the Pediatric Specialty LRP application are specific to the applicant and unique to this program. Collection of the facility or site name and POC information during the application cycle for the STAR LRP and the Pediatric Specialty LRP will be the only known mechanism for collecting site specific information that can be used for determining site eligibility.

1. **Impact on Small Businesses or Other Small Entities**

The information collection will not have a significant impact on small entities.

1. **Consequences of Collecting the Information Less Frequently**

The selection process for the STAR LRP and the Pediatric Specialty LRP applicants necessitates the collection of required data prior to HHS entering 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 and the Pediatric Specialty LRP requests the information once during the application cycle.

The selection process for STAR LRP and the Pediatric Specialty LRP sites necessitates the collection of required data prior to STAR LRP, and the Pediatric Specialty LRP participants being allowed to serve at eligible sites. If the information were collected less frequently, the STAR LRP and the Pediatric Specialty LRP could not adequately evaluate sites and determine their eligibility for STAR LRP and the Pediatric Specialty LRP participant placement or transfer.

1. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

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

1. **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 March 8, 2023, vol. 88, No. 45; pp. 14373-14374. There was one public comment where the commenter expressed support for the STAR LRP and HRSA’s dual focuses on pediatric and addiction medicine. However, the commenter recommended additional criteria that may be considered for identifying areas of high need for additional workforce investment. Specifically, the commenter recommended that HRSA consider including any substance use disorder treatment facility in automatic designation as a HPSA, and incorporate Medicaid and Medicare payer mix into eligibility determination as a STAR LRP facility. Although HRSA can not address this comment in this ICR, HRSA acknowledged the commenter’s commitment to building and supporting the Mental Health/Substance Use Disorder workforce. HRSA will consider these recommendations in anticipation of future STAR and PSLRP application cycles and prior to the development of the next ICR..

**Section 8B:**

The program has surveyed eight partnering stakeholders in 2023 to obtain constructive feedback to improve the application, improve efficiency, and minimize the collection burden. There were no suggestions for changes or revisions.

1. **Explanation of any Payment/Gift to Respondents**

Respondents will not receive any payments or gifts.

1. **Assurance of Confidentiality Provided to Respondents**

Data collected on the individual STAR LRP, and the Pediatric Specialty 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 STAR LRP, and the Pediatric Specialty 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.

1. **Justification for Sensitive Questions**

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).

1. **Estimates of Annualized Hour and Cost Burden**

**12A.** **Estimated Annualized Burden Hours**

Total Estimated Annualized Burden – Hours for the STAR LRP

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Form Name** | **Number of Respondents** | **Number of Responses per Respondent** | **Total Responses** | **Average Burden per Response (in hours)** | **Total Burden Hours** |
| STAR LRP Application | 3,200 | 1 | 3,200 | .50 | 1,600 |
| Authorization for Disclosure of Loan Information Form | 3,200 | 1 | 3,200 | .50 | 1,600 |
| Privacy Act Release Authorization Form | 3,200 | 1 | 3,200 | .50 | 1,600 |
| Employment Verification Form | 3,200 | 1 | 3,200 | .50 | 1,600 |
| Total | 12,800 | ---- | 12,800 | ---- | 6,400 |

Total Estimated Annualized Burden – Hours for the Pediatric Specialty LRP

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Form Name** | **Number of Respondents** | **Number of Responses per Respondent** | **Total Responses** | **Average Burden per Response (in hours)** | **Total Burden Hours** |
| Pediatric Specialty LRP Application | 500 | 1 | 500 | .50 | 250 |
| Authorization for Disclosure of Loan Information Form | 500 | 1 | 500 | .50 | 250 |
| Privacy Act Release Authorization Form | 500 | 1 | 500 | .50 | 250 |
| Employment Verification Form | 500 | 1 | 500 | .50 | 250 |
| Total | 2,000 | ---- | 2,000 | ---- | 1,000 |

The program estimates that the number of STAR LRP applicants/respondents will average approximately 3,200 and that the Pediatric LRP applicants/respondents will average approximately 500. The STAR LRP respondents reflect an average of data collected over a period of two years. The Pediatric LRP average is based on the number of applications we would need to review to make 150 awards to spend the $15 million in funding. 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**.

**Estimated Annualized Burden Costs**

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of****Respondent** | **Total Burden Hours** | **Hourly Wage Rate** | **Total Respondent Costs** |
| STAR LRP and Pediatric Specialty Applicants  | 600 |  \*$46.52 | $27,912 |
| Pediatric Specialty Applicants | 400 | \*$61.53 | $24,612 |
| Total | 1,000 |  | $52,524 |

\*Based on Family and General Practitioners data, Occupation Code: 29-0000 (<http://www.bls.gov/oes/current/oes_nat.htm#29-0000>) and Medical and Health Service Manager data, Occupation Code: 11-9111 (<https://www.bls.gov/oes/current/oes119111.htm>).

1. **Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs**

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

1. **Annualized Cost to Federal Government**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Instrument** | **Base Pay Rate[[1]](#footnote-2)** | **Project Time per FTE** | **Number of FTEs** | **Total Annual Cost** |
| STAR LRP and Pediatric LRP Online Application Contract | $165,660/(GS-12, Step 1) | .25 | 26 | $1,076.790.00 |
| STAR LRP and Pediatric LRP Facility or Site Information Review | $165,660/(GS-12, Step 1) | .025 | 41 | $169,801.50 |
| Total |  |  |  | $1,246,591.50 |

Processing of the STAR LRP and the Pediatric Specialty 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 equivalents (FTEs) involved in the processing of the applications. The cost for staff to process the applications and facilitate the loan repayment process for 2023 GS-12, Step 1 employees at .25 FTE rate is $1,076,790.00. The total estimated annual cost to the Government for the STAR LRP and the Pediatric Specialty LRP application and supporting forms is $1,076,790.00.

HRSA regional staff will review the STAR LRP Site Information with an average pay rate of $169,801.50 (equivalent to a GS-12, Step 1 at 2023 pay rate level). Approximately 41 DRO staff participate in reviewing site applications.

1. **Explanation for Program Changes or Adjustments**

The addition of the Pediatric Specialty LRP program, and the removal of the STAR LRP Site application form account for program burden changes sustained to the information collection request.

1. **Plans for Tabulation, Publication, and Project Time Schedule**

Statistical data for STAR LRP has been published and can be obtained at the following website: <https://data.hrsa.gov/data/download?data=SCH#SCH>. Data is published at the end of each fiscal year upon reconciliation of awards data on October 1st. As this is the first year for PSLRP, data will follow after the closeout of FY2023.

1. **Reason(s) Display of OMB Expiration Date is Inappropriate**

No exemption is requested.

1. **Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.

1. The rate used is a base rate according to the OPM salary table for 2023-RUS (annual rates and step)

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/RUS.pdf

Salaries have been doubled. [↑](#footnote-ref-2)