

Supporting Statement A
Nurse Faculty Loan Program Forms
OMB Control No. 0915-0314 - Revision

Terms of Clearance: None

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Health Resources and Services Administration's (HRSA) Bureau of Health Workforce (BHW) is requesting the Office of Management and Budget's (OMB) approval of the Nurse Faculty Loan Program (NFLP)-Program Specific Data Form, Annual Performance Report Financial Data Form and the NFLP Due Diligence Form.

This clearance request is for approval of the Nurse Faculty Loan Program (NFLP) Program Specific Data Form, the Annual Performance Report (APR) Financial Data Form and the Due Diligence Form. The APR Financial Data Form and the Program Specific Data Form are currently approved under OMB Control No. 0915-0314 with the expiration date of August 31, 2023. HRSA is adding the new NFLP Due Diligence Form to this current Information Collection Request.

Clearance is being requested for the maximum allowable time of 3 years. The deadline for submission of the NFLP-APR Financial Data is expected by August 15 of each year. The information will be used for determination of future awards to grantees and for analysis of program activity.

Legislative Purpose

The NFLP is a HRSA nursing grant program, under the auspices of the BHW, Division of Nursing and Public Health (DNPH). This program is authorized by 42 U.S.C. § 297n-1 (Public Health Service Act Section 846A) of the Public Health Service Act provides the Secretary of the U.S. Department of Health and Human Services (HHS) with the authority to enter into an agreement with schools of nursing for the establishment and operation of a student loan fund to increase the number of qualified nurse faculty. Under the agreement, HRSA makes awards to accredited schools of nursing to establish and operate a student loan program including maintaining a fund, providing loans to students enrolled in advanced education nursing degree programs, and monitoring compliance with program requirements. In exchange for completion of up to four years of post-graduation full-time nurse faculty employment in an accredited school of nursing, graduates receive cancellation of up to 85 percent of the original student loan amount (plus interest thereon) as authorized by the program. In fiscal year 2023, the NFLP appropriation was approximately \$26.5 million.

Under the NFLP, HHS makes an award to the eligible institution in the form of a Federal Capital Contribution (FCC). The institution uses the FCC to establish and operate a distinct, interest-bearing NFLP loan fund ("the Fund") used only for making NFLP loans to eligible students and for the costs associated with collection of these loans. The institution is required to deposit an Institutional Capital Contribution (ICC) that is no less than one-ninth of the requested FCC into this fund. The school will

deposit into the Fund: (1) the FCC, (2) an ICC equal to not less than one-ninth of the FCC, (3) collections of principal and interest on NFLP loans made from the Fund, and (4) all other earnings of the Fund.

2. Purpose and Use of Information Collection

The NFLP- APR Financial Data Form is used to monitor and evaluate institutional performance. The data form is an official reporting tool and is required by active NFLP grantee schools that operate the NFLP loan fund. The grantee must complete and submit the online data form annually in the HRSA Electronic Handbooks (EHBs) Performance Report module. The NFLP-APR Financial Data Form collects outcome and financial data to capture the NFLP loan fund account activity related to financial receivables, disbursements, and borrower account data related to employment status, loan cancellation, loan repayment, and collections. NFLP grant recipient schools will provide HHS with current and cumulative information on: (1) NFLP loan funds received, (2) number and amount of NFLP loans made, (3) number and amount of loans cancelled, (4) number and amount of loans in repayment, (5) loan default rate percent, (6) number of NFLP graduates employed as nurse faculty, and (7) other related loan fund costs and activities. NFLP grant recipient schools must keep records of all NFLP loan fund transactions. The NFLP-APR Financial Data Form is used to monitor grantee performance by collecting information related to the NFLP loan fund operations and financial activities for a specified reporting period (July 1 through June 30 of the academic year).

The NFLP-APR Financial Data Form is also used to report the borrower account status under multiple categories (enrollment, graduation, employment, cancellation, repayment, default, forbearance, etc.). Schools are expected to review the cash balance in the NFLP fund on an annual basis to determine whether the unused accumulation (loan fund balance), compared with projected levels of expenditures and collections, exceeds its needs.

The unused accumulation of funds is reported each year on the NFLP-APR Financial Data Form to assist with the fiscal year award determination.

The NFLP-APR Financial Data Form will only collect financial data that is limited to financial data and will not include nursing degree program data and student enrollee data. The APR Financial Data Form data form will be used to collect NFLP loan fund activity data from grantee schools receiving Federal funding to administer the NFLP.

Approval of the NFLP-Program Specific Data Form will facilitate an automated data collection capability for the NFLP. The electronic data collection capability will streamline the application submission process, enable an efficient award determination process, and serve as a data repository to facilitate reporting on the use of funds and analysis of program outcomes. Additionally, the data will be used to ensure programmatic compliance with the legislative authority and program guidance and to formulate and justify the appropriation to OMB and Congress.

The NFLP-Program Specific Data Form will capture program-related information provided by the applicant. NFLP applicants will complete and submit the NFLP-Program Specific Data Form as an electronic attachment with the required application materials. The form will provide the Federal Government with specific data from the applicant which include: (1) the amount of the Federal funds requested by the applicant, (2) the expected contribution from the applicant, (3) the student enrollment and graduation data based on current and prospective NFLP loan recipients, (4) the graduate nursing

education programs supported under NFLP, (5) the program accreditation status, (6) the current tuition and fee information for graduate nursing education programs, and (7) the projected NFLP loan fund balance that may be considered as part of the award determination. The data provided in the NFLP-Program Specific Data Form are essential for the formula-based criteria used to determine the award amount to the applicant schools.

The NFLP-Program Specific Data Form will be used to collect the data required to make award determinations for eligible applicants. The data provided in the form, such as the school's default rate, the applicant's loan fund balance, etc. are essential for the formula-based criteria used to determine the award amount to the applicant schools. Continued approval of the revised NFLP – Program Specific Data Form will allow HRSA to efficiently capture data to generate the formula-based award.

The data collected on the NFLP Due Diligence form will include the student borrower's unique ID number, reason for cancellation, the amount of principal loaned, the total amount of principal loan funds and corresponding interest canceled, and the outstanding amount of principal/interest being canceled or written-off. The NFLP Due Diligence Form is essential for monitoring performance measure outcomes and to verify and validate accuracy of information submitted on the NFLP Annual Performance Reports.

The NFLP Due Diligence Form will be a required form to be completed and submitted electronically by NFLP grant recipient schools. This form indicates that due diligence has been exercised in the cancellation of any remaining loan funds for NFLP borrowers due to permanent/total disability, death, and uncollectible/bad debt write offs..

3. Use of Improved Information Technology and Burden Reduction

The electronic (online) NFLP-APR Financial Data Form and the NFLP- Program Specific Data Form were fully developed and implemented as part of the existing HRSA EHBs system in fiscal year 2009. NFLP grantees are required to access the online performance report through the EHBs to submit annually. The data forms are accessible to registered EHBs users via the internet. The NFLP Due Diligence Form is accessible via the internet.

4. Efforts to Identify Duplication and Use of Similar Information

The information requested in the NFLP-APR Financial Data Form, the NFLP- Program Specific Data Form, and the NFLP-Due Diligence Form are specific to the grantee institution and are unique to this program. The information requested is not available from any other source.

5. Impact on Small Businesses or Other Small Entities

The data collection does not involve small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

The process for submitting the NFLP-APR Financial Data Form occurs annually, following completion of the grantee's one year project period (July 1 through June 30 of the academic year). In the absence of

collecting this data, the determination for future funding and analysis of the grantee's performance cannot be carried out.

The process for submitting the NFLP- Program Specific Data Form occurs annually, prior to the academic school year. In the absence of collecting these data, the review, selection and approval of funding for qualified applicants cannot be carried out.

The process for submitting the NFLP Due Diligence Form is required to show NFLP recipient schools have exercised due diligence in the cancellation of any remaining loan fund for NFLP borrowers due to permanent/total disability, death, and uncollectible/bad debt write offs.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This information collection is consistent with 5 CFR 1320.5(d)(2), except for 5 CFR 1320.5(d)(2) (v) through (viii); there are no special circumstances with respect to: 1) use of statistical data classifications, 2) pledge of confidentiality not supported by statute or regulation or required proprietary, and 3) trade secret, or other confidential information not protected by agency procedures.

8. Comments in Response to the Federal Register Notice/Outside Consultation

A 60-day Notice published in the *Federal Register* on March 8, 2023, vol. 88, No. 45; pp. 14378-14379. There were no public comments.

9. Explanation of any Payment/Gift to Respondents

Respondents will not receive any payments or gifts.

10. Assurance of Confidentiality Provided to Respondents

The Privacy Act of 1974 (5 U.S.C. 522a) requires any agency to provide notification to individuals who supply information. The Privacy Act Notification Statement is provided to all NFLP applicants. This statement provides the statutory authority for collecting the information and describes the purpose of the information collection and the potential disclosure.

11. Justification for Sensitive Questions

The data collection does not request sensitive information from the grantee school.

12. Estimates of Annualized Hour and Cost Burden

12A. Estimates of Annualized Burden Hours

Form Name	Number of Respondents	Number of Respondents per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
Nurse Faculty Loan Program-Program Specific Data Form	90	1	90	8	720
Nurse Faculty Loan Program - Annual Performance Report Financial Data Form	207	1	207	6	1242
Nurse Faculty Loan Program – Due Diligence Form	20	1	20	1	20
Total Burden	317	--	317	--	1982

These estimates were derived from an average number of respondents obtained in past years, which yielded the number of respondents provided for the next three years.

12B. Estimated Annualized Burden Cost

The report is generally completed by accountant staff at the grantee school. The average hourly salary for an Accountant is \$37.50 per hour. This salary amount is based on the occupational employment for institutions under the Business and Financial Operations category from the Bureau of Labor Statistics site at http://www.bls.gov/oes/current/naics4_611300.htm.

Form Name	Title of Respondent	Estimated Time (Burden in hours)	Average Hourly Rate ¹ (in dollars)	Total Cost Burden (in dollars)
NFLP – Annual Performance Report Financial Data Form	Accountant	1242	\$75	\$93,150
NFLP – Program Specific Data Form	Accountant	720	\$75	\$54,000
NFLP-Due Diligence Form	Accountant	20	\$75	\$1,500

¹ Average Hours Rate was double to account for overhead and benefits.

Total		1,982		\$148,650
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13. Estimates of other Total Annual Cost Burden to Respondents or Record Keepers/Capital Costs

There are no annualized costs to respondents or record-keepers. Award recipients must maintain all borrowers' records at the institution's level (such as leave of absence, repayments, payments, cancellations, etc.).

14. Annualized Cost to Federal Government

The report is reviewed and approved by the designated Federal Public Health Analyst (or Project Officer) that monitors the program. The average hourly salary for the position of Nurse Consultant at the GS-13-Step 2 grade level is \$55.46 per hour (or \$83.19 with overhead and benefits). The Federal hourly salary information is available on the OPM web site at

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf> and https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB_h.pdf

Form Name	Total Responses	Estimated Review Time (in hours)	Estimated Hourly Federal Salary (in dollars)	Total Cost Burden (in dollars)
NFLP – Annual Performance Report Financial Data Form	207	0.50	83.19	\$8,610.17
NFLP – Program Specific Data Form	90	0.75	83.19	\$ 5,615.3
NFLP-Due Diligence Form	20	0.50	\$83.19	\$831.9
Total	317			\$ 15,057.37

15. Explanation of Program Changes or Adjustments

The current burden inventory for the 0915-0314 information collection request is 1,982 hours. Although the NFLP Due Diligence Form was added, the NFLP program sustained a decrease of 298 burden hours when compared to the current Notice of Action.

Prior to June 2021, the NFLP grant consisted of two different activity codes E01 & E0A and were maintained as separate grants folders at HRSA and by the grantee at the institutional level. This resulted in the completion and submission of two NFLP-APR Financial Data Forms in the EHBs by the same institution. As of 06/2023, HRSA consolidated the 2 activity codes and closed all E0A accounts (all E0A accounts were merged with their corresponding E01 accounts). This consolidation process reduced NFLP awardees burden of maintaining 2 separate accounts and completing 2 separate NFLP-APR Financial Data Forms by requiring completion of one NFLP-APR Financial Data Form.

16. Plans for Tabulation, Publication and Project Time Schedule

There are no plans for tabulation, statistical analysis, or publication of data requested. None of the information collected in these instruments is used in a published report by HHS/HRSA.

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

The expiration date will be displayed.

18. Exception to Certification for Paperwork Reduction Act Submissions

This information fully complies with the guidelines set forth in 5 CFR 1320.9. The required certifications are included in the package. No exception is required.

ATTACHMENTS TO SUPPORTING STATEMENT

Attachment 1: 60-Day Notice

Attachment 2: NFLP Legislation