

National Institute of Food and Agriculture
U.S. Department of Agriculture
OMB No. 0524-0050
Veterinary Medicine Loan Repayment Program

1SUBJECT: Supporting Statement A for Paperwork Reduction Act Submission for all records, forms and reporting requirements associated with the Veterinary Medicine Loan Repayment Program (VMLRP)

A. JUSTIFICATION

1. CIRCUMSTANCES MAKING COLLECTION OF INFORMATION NECESSARY

In December 2003, the National Veterinary Medical Service Act (NVMSA) was passed into law adding section 1415A to the National Agricultural Research, Extension, and Teaching Policy Act of 1997 (NARETPA). This law established a new Veterinary Medicine Loan Repayment Program (7 U.S.C. 3151a) authorizing the Secretary of Agriculture to carry out a program of entering into agreements with veterinarians under which they agree to provide veterinary services in veterinarian shortage situations. The purpose of the program is to assure an adequate supply of trained food animal veterinarians in shortage situations.

The National Institute of Food and Agriculture (NIFA) will designate geographic and practice areas that have a shortage of food supply veterinarians in order to carry out the VMLRP goals of strengthening the nation's animal health infrastructure. NIFA will carry out NVMSA by entering into educational loan repayment agreements with veterinarians who agree to provide veterinary services in veterinarian shortage situations for a determined period of time.

Before NIFA educational loan repayment agreements can be issued, certain nomination information is required from State Animal Health Officials (SAHO). This information is obtained via a VMLRP Veterinarian Shortage Situation Nomination Form. The nominations submitted are reviewed by a merit panel, and it is particularly important the information be provided in a standardized fashion to ensure equitable treatment for all nominations.

After shortage situations are designated, the VMLRP must request information from applicants related to eligibility, qualifications, career interests, and recommendations necessary to evaluate their applications for repayment of educational indebtedness in return for agreeing to provide veterinary services in veterinarian shortage situations. The information for collection will also be used to determine an applicant's eligibility for participation in the program. It is particularly important the information be provided to NIFA in a standardized fashion to ensure equitable treatment for all applicants.

Once veterinarians are selected for participation in the VMLRP and enter into an educational loan repayment agreement with NIFA, a service log must be maintained by the participant. The participant must report service and payment information to the VMLRP for oversight of the agreement. This information must be provided in a standardized fashion to ensure equitable oversight for all participants and for monitoring the program's short-term impacts.

After a participant's agreement ends, information related to the retention of a veterinarian's services in the shortage situation post-agreement must be collected to assess long-term impacts. This information must be provided in a standardized fashion in order to assess trends over time.

Additionally, information from participants on program performance and status of the veterinarian shortage situations is needed for program process assessment and improvement. This feedback will provide insights into participant perceptions, experiences and expectations and contribute directly to improvements in program management. This information must be provided in a standardized fashion in order to assess all elements of the program and the relevant need of veterinary services in the shortage situations being served.

2. HOW, BY WHOM, AND PURPOSE FOR WHICH INFORMATION IS TO BE USED

- a. Veterinarian Shortage Situation Nomination. NIFA will publish a solicitation in the *Federal Register* for the veterinarian shortage situations every three years. SAHO's will submit the necessary information to NIFA using the Veterinarian Shortage Situation Nomination form on an annual basis.

NIFA will convene a panel of food supply veterinary medicine experts from Federal and/or state agencies, industry, private mixed or large animal practice or an institution receiving Animal Health and Disease Research Program funds under section 1433 of NARETPA or an 1862 Land-Grant institution, to review the nominations and make recommendations to the National Program Leader. Nominations designated as veterinarian shortage situations are made available via the VMLRP website for applicants to review. The contents of the Veterinarian Shortage Situation Nomination form outline the services, the location and the species or veterinary discipline a VMLRP participant is agreeing to provide.

- b. Application. NIFA will publish the Request for Application (RFA) on the NIFA website for VMLRP loan repayment applications from individual veterinarians on an annual basis. Interested individuals submit the necessary information to NIFA using the application forms:

- Application Part 1: Program,
- Application Part 2: Financial; and
- Application Part 3: Recommendation.

NIFA convenes an external peer review panel to review submitted and eligible applications to make recommendations to the NIFA National Program Leader. The panelists include food supply veterinary medicine experts from Federal and state agencies, private veterinarians, as well as individuals from institutions receiving Animal Health and Disease Research Program funds under section 1433 of NARETPA, private associations, and other relevant organizations.

The information collected allows the peer review panel to evaluate each applicant's qualifications, career interests, and letters of recommendation to identify the most meritorious applications for repayment of educational indebtedness in return for agreeing to provide veterinary services in veterinarian shortage situations. The information collected is also used by NIFA staff to determine an applicant's eligibility for participation in the VMLRP and to establish their award amount.

- c. Records and Reports. When an applicant is offered an award, they are provided a contract to sign. The contract outlines the obligations of the participant and NIFA as it relates to service, payments, and reporting as well as outlines circumstances of non-compliance or inability to fulfill the contract. The contract reflected the reporting requirements described in this packet as well as language consistent with current legislation. In the previously approved collection, NIFA required applicants to complete form NIFA 05-10 as the legally binding agreement between the selected applicant and the Secretary of USDA and/or NIFA Director, agreeing to the terms and conditions for participation in the VMLRP. In this collection, NIFA has eliminated form NIFA 05-10 because it does not collect information from the applicant.

NIFA requires two records for reporting each quarter. The Service Log is maintained by the participant and is a record of each service, including location and duration, performed to fulfill the requirements of their agreement. The Service Verification is a signed statement by the participant that he/she has performed the services required each quarter. It is an affidavit signed by the participant certifying they are still employed and provided the services as required by the terms and conditions of their service agreement. The Service Verification and Service Log is submitted via a secure cloud-based content management tool. Payment is issued upon receipt of these forms.

At a minimum, the service log for type I and II shortage situations should contain: participant name and service agreement information; date of service; duration of service/appointment; windshield/drive time (if being counted for service hours); animal commodity or species served; estimated number of head serviced; name and county of client/farm receiving services; and a description of the services provided. The service log for type III shortage situations should contain, at a minimum: participant name and service agreement information, date of service/activity, duration of service/activity, and description of service/activity conducted including role of the VMLRP participant. This Service Log is subject to a random programmatic review to verify that services provided are consistent with requirements of the shortage situation being served.

During the last quarter of the agreement period VMLRP staff provide participants with a Close Out Report form to return by the end of their agreement period to receive their final loan payment. Responses submitted in this report are subject to reporting as aggregate data within the program's annual report or as requested by stakeholders and Congress. Additionally, any specific information relevant to the status of the shortage situation will be provided to SAHOs to aid them during the nomination process.

The information collected enables VMLRP staff to provide program oversight ensuring participants are providing services as outlined in the veterinarian shortage situation form for the shortage situation, they have agreed to serve and that federal funds are being distributed properly. Additionally, the Close Out Report enables the VMLRP to evaluate program impacts and projected outcomes.

- d. Surveys. The Close Out Report must be completed before the grantee receives. However, all other surveys are voluntary. The mandatory Close Out Report as well as the additional voluntary surveys will be provided as a link to a web-based survey system or provided as a PDF-fillable form attached to an email. All applicants will receive an Applicant Process Feedback Survey after applying to the VMLRP. Awardees will receive an Awardee Feedback Survey after completing their first year of their agreement. Past participants will receive a Post-Award Survey one, three and five years after agreement period end date. SAHO's will receive the Survey of Animal Health Officials Completing the Veterinarian Shortage Nomination Form on an annual basis.

The information collected will allow the VMLRP to assess program processes and impacts, make program improvements based on process feedback, and provide feedback to SAHOs on veterinarian shortage situations which can aid them during the nomination process.

All information submitted to the VMLRP is subject to reporting as aggregate data in the program's annual report (except responses to the Applicant Process Feedback Survey) or as requested by stakeholders and Congress.

3. USE OF IMPROVED INFORMATION TECHNOLOGIES

In consultation with external stakeholders, NIFA has reviewed and evaluated this collection and proposes to implement numerous technological changes that will improve accessibility. NIFA will now

provide the Veterinarian Shortage Situation Nomination Form, the Application Form and Surveys in the accessible and PDF-fillable format. Surveys and Closeout Reports will also be offered via user-friendly web-based survey systems. The proposed technological updates will also reduce the time needed to complete the information collection, as well as the time needed for NIFA staff to review the information collected.

4. EFFORTS TO IDENTIFY DUPLICATION

This is the only loan repayment program administered by NIFA. There is no similar information available which can be used or modified to meet the information needs of this program. The information requested is specific to the VMLRP. NIFA has evaluated the forms included in this collection and has eliminated redundant and repetitive questions.

5. METHODS TO MINIMIZE BUDGET OF SMALL BUSINESSES OR ENTITIES

This information collection will have no impact on small businesses or small entities as the respondents do not include any small businesses or entities.

6. CONSEQUENCE IF INFORMATION COLLECTION WERE LESS FREQUENT

- a. Shortage Situation Nomination. SAHOs submit VMLRP Veterinarian Shortage Situation Nomination forms for designated veterinarian shortage situations only when requested by NIFA, usually on an annual basis. If nomination forms are not collected, NIFA would be unable to properly screen and evaluate nominations.
- b. Application. Individual veterinarians interested in applying for a loan repayment agreement with the VMLRP will submit VMLRP application forms only during the application period. If application materials are not collected on annual basis, NIFA would be unable to accept and evaluate applications, and determine which applicants will receive funding through the VMLRP program in a timely manner.
- c. Records and Reporting. Participants must maintain an electronic Service Log presented to VMLRP staff quarterly. Without the Service Log, VMLRP staff are unable to verify services provided by a participant are consistent with the terms and conditions of the service agreement. Obtaining this information any less frequently could result in delayed payments, increased financial burden on the participant due to compounded interest, and delayed identification of service agreement breaches after release of government funds.

On a quarterly basis a participant will submit the Service Verification form affirming employment and service under the terms and conditions of the VMLRP service agreement. Obtaining this information any less frequently could result in delayed payments, increased financial burden on the participant due to compounded interest, and delayed identification of agreement breaches after release of government funds.

The Close Out Report is provided at the end of the service agreement. If the data is not collected the VMLRP program will not be able to highlight services provided by participants, describe the impact the program is having on shortage situations in the short-term, assess the potential retention of a participant's services for the shortage situation, or provide this information to Members of Congress, USDA, and stakeholders.

- d. Surveys. The SAHO, applicant and awardee surveys will only be provided once, either prior to

application or during the service agreement. If NIFA did not receive these voluntary surveys it would impair the Agency's ability to evaluate applicant and participant satisfaction with the program, respond in a timely manner to their needs, and provide information for determining future shortage situations to stakeholders.

The Post-Award Survey is provided one, three- and five-years post-service agreement. These time intervals were selected based on the Bureau of Labor's statistic that the average American job tenure is 4.7 years and reports around half of food animal veterinarians leave food animal practice in the first five years. Obtaining responses at these intervals will enable the program to approximate if and when participants make employment or service changes. Longer intervals would increase recall bias associated with the reasons for retention and increase the chance that a participant would be lost for follow-up.

7. SPECIAL CIRCUMSTANCES FOR INFORMATION COLLECTION

Requiring respondents to report information to the agency more often than quarterly:

USDA does not require program participants to report information to the agency more often than quarterly.

All other information requests may be conducted on a situational basis.

Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt:

VMLRP does not require a written response to a collection of information in fewer than 30 days.

Requiring respondents to submit more than an original and two copies of any document:

USDA does not require respondents to submit more than an original and two copies of any document.

Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years:

The agency usually does not require respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years following completion of a service agreement.

In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study:

The information collected in association with the surveys will be voluntary. SAHO, applicant process feedback and awardee feedback surveys will not be used for statistical purposes. Statement B is provided.

Requiring the use of a statistical data classification that has not been reviewed and approved by OMB:

This information collection does not require the use of statistical data classification that has not been reviewed and approved by OMB.

- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use:**

This information collection does not require a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.

- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it instituted procedures to protect the information's confidentiality to the extent permitted by law:**

This information collection does not require respondents to submit proprietary trade secret, or other confidential information.

8. FEDERAL REGISTER NOTICE

Notice of intent to renew and revise this information collection was published in the *Federal Register* on Wednesday, July 20, 2022, Vol. 87, No. 138 (87 FR 43235). NIFA received one comment from this announcement, but it was not relevant to this information collection.

CONSULTATIONS WITH PERSONS OUTSIDE THE AGENCY

NIFA sought consultation outside the agency with the following individuals:

Nick Lemmel, DVM
Animal Clinic and Pharmacy
Email: nlemmelvet@gmail.com

Jody A Kull, DVM
Valley Mobile Veterinary Service
vmvs@verizon.net

Christian Keen
Freel Veterinary Services
christiankeen411@gmail.com

James L. Maxwell, DVM
State Veterinarian, Director
Animal Health Division
West Virginia Department of Agriculture
Commissioner, Kent A. Leonhardt
Email: jmaxwell@wvda.us

Hallie Hasel, DVM
Wyoming Livestock Board
hallie.hasel@wyo.gov

Stakeholders provided information related to time needed to complete the collection, provided suggestions to improve instructions and formatting, and also recommended that redundant questions be eliminated. In response, NIFA has eliminated redundant and repetitive questions, updated the formatting, and reviewed instruction language in order to improve clarity.

9. DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEEES

The agency does not provide payment or gift to respondents, other than remuneration of contractors or grantees.

10. CONFIDENTIALITY PROVIDED TO RESPONDENTS

The information collection will be handled in accordance with the Freedom of Information Act and the Privacy Act. A Veterinarian Medicine Loan Repayment System of Records Notification (SORN) appeared in the *Federal Register* on March 9, 2018.

11. QUESTIONS OF A SENSITIVE NATURE

Information will be requested involving the applicant's name, address, service payback obligations, employment data, professional performance and credentialing history (of licensed veterinarians); personal, professional, and demographic background information; financial data including loan balances, deferment, forbearance, and repayment/delinquent/default status information. This information will be used to: (1) Evaluate applicants and select participants for the VMLRP; (2) monitor loan repayment activities, such as payment tracking, deferment of service obligation, and default; and (3) assist NIFA officials in the collection of overdue debts owed under the VMLRP.

None of the information maintained in the Service Log or requested on the Veterinarian Shortage Situation Nomination Form, Survey of Animal Health Officials Completing the Veterinarian Shortage Nomination Form, Applicant Process Feedback Survey, Awardee Feedback Survey, Close Out Report, and Post-Award Survey is of a sensitive nature.

12. ESTIMATE OF BURDEN

- a. Veterinarian Shortage Situation Nomination. The Veterinarian Shortage Situation Nomination form is completed by SAHOs. It is estimated completion of this form, which includes checkboxes and text-limiting fields to minimize the overall burden, will take approximately two hours.
- b. Application. The application is completed by individuals applying to the VMLRP program. It is estimated it will take each applicant approximately eight hours to complete the forms. It is also estimated it will take each recommender approximately one hour to complete the recommendation form. All of these forms are PDF-fillable with checkboxes and text-limiting fields to minimize the overall burden. The application forms were consolidated to be more streamlined for the application process.
- c. Records and Reports. Records and Reports are completed for all participants in the VMLRP

program. For each participant a Service Log and Service Verification form must be completed and submitted on a quarterly basis. A Close Out Report must be provided at the completion of the service agreement. It is estimated it will take approximately fifteen minutes to record each day's services, approximately fifteen minutes to complete the Service Verification form, and approximately twenty minutes to complete the Close Out Report.

- d. Surveys. Voluntary surveys are provided to SAHOs who complete the Veterinarian Shortage Situation Nomination form, applicants to the VMLRP program and individuals who are selected as participants in the program. NIFA estimates that it will take each participant approximately fifteen minutes to complete the Applicant Process Feedback Survey, Awardee Feedback Survey and Post-Award Survey. NIFA estimates it will take each SAHO approximately twenty minutes to complete the Survey of Animal Health Officials Completing the Veterinarian Shortage Nomination Form.

ANNUALIZED COSTS TO RESPONDENTS

Type of Respondent	Total Hours	Hourly wage ¹	Total Cost Burden
<i>State Animal Health Officials</i>	500	\$52.84	\$26,420
<i>Applicants</i>	1,240	\$48.26	\$59,842
<i>Recommenders</i>	450	\$48.26	\$21,717
<i>Current Participants</i>	14,570	\$48.26	\$703,148
<i>Past Participants</i>	38	\$48.26	\$1,834
Grand Total:	16,798	---	\$812,961

¹All salaries were obtained from Bureau of Labor Statistics, median wage used unless a mean specifically posted for the position (<http://www.bls.gov/oes/current/oes291131.htm>).

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Type of Respondent and Form	No. of Respondents	Annual Frequency per Response	Total Annual Responses	Hours per Response	Total Hours
<i>State Animal Health Officials:</i>					
Veterinarian Shortage Situation Nomination Form	60	4	240	2	480
Survey of Animal Health Officials Completing the Veterinarian Shortage Nomination Form	60	1	60	.33	20
Animal Health Officials subtotal	60	---	300	---	500
<i>Applicants:</i>					
Application Part 1: Program	150	1	150	2	300
Application Part 2: Financial	150	1	150	6	900
Applicant Process Feedback Survey	150	1	150	.25	40
Applicants subtotal	150	---	450	---	1240
<i>Recommenders:</i>					
Application Part 3: Recommendation	450	1	450	1	450
Recommenders subtotal:	450	---	450	---	450
<i>Current Participants:</i>					
Service Log	220	260	57,200	.25	14,300
Service Verification	220	4	880	.25	220
Awardee Feedback Survey	80	1	80	.25	20
Close Out Report	80	1	80	.33	30
Current Participant subtotal:	220	---	58,240	---	14,570
<i>Past Participants:</i>					
Post-Award Survey	150 ¹	1	150	.25	38
Past Participant subtotal	150	---	150	---	38
Grand Total:	1,030	---	59,590	---	16,798

100% response rate.

This estimate accounts for the cost of fringe benefit cost for the respondents.

13. CAPITAL/STARTUP COSTS

There are no capital or startup costs for this activity.

14. ANNUALIZED COST TO THE FEDERAL GOVERNMENT

1The staff members responsible for administering the VMLRP are full-time employees ranging in grade levels GS-9 to GS-15. Processing of VMLRP forms and data associated with these forms is included in their regularly assigned duties. This estimate includes the cost of fringe benefits.

Staff	Action	Annual Salary*	%FTE for Program	Total Annualized Cost
Program Assistant, GS-9	Processes applications for preliminary review, assists with data entry	\$62,809	10	\$6,281
Grants Management Specialist, GS-12	They Assess Loan Eligibility, process service verifications quarterly, validate number of hours worked quarterly, provide	\$91,085	100	\$91,085

	technical assistance, process payment verifications, and customer service.			
Capacity Branch Chief, GS 14	Signature designee on award offers and service agreements to awarded participants.	\$127,988	10	\$12,799
Program Specialist, GS-12	Reviews applications for administrative compliance, coordinates panel meetings, distributes and collects surveys, assists with data analysis and reports	\$91,085	40	\$36,434
Program Coordinator, GS-13	Evaluates applications, coordinates panel members, announces awards, audits service, analyzes data and develops reports	\$108,308	60	\$64,985
National Program Leader, GS-15	Program direction and oversight, stakeholder relations, direct programmatic interaction with awardees and State Animal Health Officials, review and validation of service logs, analysis of survey data.	\$150,549	60	\$90,329
TOTALS			3 FTEs	\$301,913

*Dollar amounts derived from the 2022 Federal Pay Tables for Kansas City-Overland Park-Kansas City, MO-KS assuming each a step 5 annual salary for each GS level listed.

15. REASONS FOR CHANGE IN BURDEN

The burden estimate for this collection has increased by approximately 4,340 hours each year (from 12,458 hours to 16,798 hours). The increase is the result of increased participation in this program. Consequently, the number of responses has increased by over 18,000 responses per year (from 41,520 in 2019 to 59,590 currently). While the overall burden estimate has increased, the amount of time per response has decreased by 1.5 hours per response. This is because redundant questions have been eliminated, forms have been streamlined, and form NIFA 05-10 has been eliminated.

16. TABULATION, ANALYSIS AND PUBLICATION PLANS

All information submitted to VMLRP is subject to reporting as aggregate data in the program's annual report, which is posted on the NIFA website, <http://nifa.usda.gov/vmlrp-reports-and-statistics>.

17. SEEKING APPROVAL TO NOT DISPLAY OMB APPROVAL DATE ON FORMS

All VMLRP forms will display the OMB approval date.

18. EXCEPTION(S) TO THE CERTIFICATION STATEMENT

USDA claims no exceptions to the certification statement