

DATE: December 10, 2025

TO: Dan Cline, OMB Desk Officer

FROM: Samantha Miller, HRSA Information Collection Clearance Officer

Request: The Health Resources and Services Administration (HRSA) Bureau of Primary Health Care requests approval for changes to the information collection titled “Applications for Deemed Public Health Service Employment with Liability Protections Under the FTCA for Health Centers, Deemed Health Center Volunteers, and Free Clinic Sponsored Individuals” (OMB # 0906-0090, expiration date 05/31/2027).

Purpose: The Health Resources and Services Administration (HRSA) requests the Office of Management and Budget (OMB) approval of a non-substantive change to the Federal Tort Claims Act (FTCA) information collection. The purpose of the edits to keep application forms current by rolling forward year references (e.g., clarifying that applications submitted in 2026 reference 2025 activities) and removing several COVID19–specific prompts in the Free Clinic and Health Center Volunteer Health Professional (VHP) application modules. These edits do not alter the purpose, respondents, or use of the collection, introduce new questions, or change the collection method.

Please note, it is estimated that the changes will not go into effect until February 26, 2026, for the Health Center and Health Center VHP program and August 1, 2026, for the Free Clinic Volunteers program.

This memo explains the changes and supporting rationale.

Changes: The non-substantive changes are to keep the guidance examples listed current and to remove questions based on expired authorities to avoid confusion. The changes consist of:

- Editorial updates to the Health Center Tool to keep guidance current (e.g., updating the year).
- Removal of COVID-19-specific screening questions, attestations, and upload instructions because pandemic specific vaccination authorities have expired.

The changes are outlined in Table A below.

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 December 17, 2025, to implement the changes in the data collection instruments and to prepare for the timely collection of data critical to HRSA researchers.

Burden: These changes included herein do not change the estimated reporting burden for health centers. Any theoretical time savings from deleting those prompts is very small and when averaged across all respondents and responses, rounds down to zero.

PROPOSED CLARIFICATIONS AND NON-SUBSTANTIVE CHANGES:

Table A

Form Title	Section/Item	Current	Proposed	Rationale
Application for Health Center Program Recipients for Deemed PHS Employment with Liability Protections Under the FTCA	Training plan example text	“For example, application submitted in 2025 must include the complete training plan used in 2024.”	“For example, application submitted in 2026 must include the complete training plan used in 2025.”	Editorial date roll forward to keep the example current and avoid confusion.
Application for Free Clinics to Sponsor Individuals for Deemed PHS Employment with Liability Protections Under the FTCA	COVID-19 vaccinator identification	Q: “Is this volunteer a COVID-19 vaccination volunteer who will be volunteering solely to administer COVID-19 vaccinations? [] Yes [] No”	Removed	Obsolete emergency specific screening no longer applicable.
Application for Free Clinics to Sponsor Individuals for Deemed PHS Employment with Liability Protections Under the FTCA	COVID-19 special authority attestation & uploads	Attestation and upload options regarding COVID-19 special state/federal authorities permitting vaccination under	Removed	Obsolete; emergency authorities no longer relevant to routine operations.

Form Title	Section/Item	Current	Proposed	Rationale
		special grant of authority.		
Application for Deemed Health Center Program Recipients to Sponsor Volunteer Health Professionals (VHPs) for Deemed PHS Employment with Liability Protections Under the FTCA	Sole COVID-19 vaccinator screen	“Is this volunteer volunteering solely to administer COVID-19 vaccinations? [] Yes [] No”	Removed	Same rationale as above.
Application for Deemed Health Center Program Recipients to Sponsor Volunteer Health Professionals (VHPs) for Deemed PHS Employment with Liability Protections Under the FTCA	Note in volunteer agreement about COVID-19 vaccinators	Instruction to include COVID-19 vaccinator info and any state/federal requirements in volunteer agreement.	Removed	Obsolete instruction.
Application for Deemed Health Center Program Recipients to Sponsor Volunteer Health Professionals (VHPs) for Deemed PHS Employment with Liability Protections Under the FTCA	COVID-19 special authority attestation & uploads	Attestation and upload options regarding special COVID-19 vaccination authorities.	Removed	Obsolete.