

Supporting Statement A

National Health Service Corps Loan Repayment Program

OMB Control No. 0915-0127 Revision

Note: OMB control number prefix will change to 0906- after OMB approval.

A. JUSTIFICATION

1. Circumstances of Information Collection

This is a request for Office of Management and Budget (OMB) approval for a revision of the *National Health Service Corps (NHSC) Loan Repayment Program (LRP) Application*. An NHSC LRP application is required by 42 U.S.C. 2541-1(c). The current NHSC LRP regulations are found at 42 CFR Part 62. The current OMB approval number for the application (including the Authorization for Disclosure of Loan Information Form, the Privacy Act Release Authorization Form, the Verification of Disadvantaged Background Form, and the Private Practice Option Form) is 0915-0127, expiring on 03/31/2026. The legislative authority stating the need for the information collected in this application is found in Section 333 [254f] (a)(1) of the Public Health Service Act.

The NHSC Loan Repayment Programs are administered by 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). The National Health Service Corps (NHSC) Loan Repayment Program (LRP) was established to assure an adequate supply of trained primary care health professionals to provide services in Health Professional Shortage Areas (HPSAs) of the United States with greatest need. The NHSC Substance Use Disorder (SUD) Workforce LRP and the Rural Community LRP were established to recruit and retain a health professional workforce with specific training and credentials to provide evidence-based SUD treatment in HPSAs. Under these programs, the Department of Health and Human Services agrees to repay the qualifying educational loans of selected primary care health professionals.

Under the NHSC LRP, SUD Workforce LRP and the Rural Community LRP, HHS enters into contracts with selected primary care health professionals including behavioral and oral health providers who agree to provide culturally competent, interdisciplinary primary health care services to underserved populations located in HPSAs identified by the Secretary of HHS. In return, the NHSC LRP assists clinicians in their repayment of outstanding qualifying educational loans.

All NHSC Loan Repayment Programs application information and forms are electronic and are used to determine the applicants' eligibility and the verification of existing graduate and/or undergraduate educational loans.

2. Purpose and Use of Information

The purpose of this information collection is to obtain information through the NHSC LRP, NHSC SUD Workforce LRP and the NHSC Rural Community LRP Applications that is used to assess an LRP applicant's eligibility and qualifications for the LRP, and to obtain information for NHSC site applicants. Clinicians interested in participating in the NHSC LRP must submit an application to the NHSC to participate in one of the NHSC programs, and health care facilities must submit an NHSC Site Application and Site Recertification Application to determine the eligibility of sites to participate in the NHSC as an approved service site. The NHSC LRP participant application asks for personal, professional, and financial information needed to determine the applicant's eligibility to participate in the NHSC LRP.

The proposed revisions in this ICR include asking applicants to complete the NHSC Spanish Language Assessment Proficiency Test Form. The NHSC will use this information to assess an applicant's proficiency in speaking Spanish, to directly provide culturally Spanish speaking services to limited English proficiency patients. Applicants interested in receiving a one-time award enhancement will be required to complete the assessment. The Spanish Language Assessment asks for professional, personal, and geographical information. The NHSC LRP aims to address language access barriers to health care. This award enhancement will be afforded to providers who demonstrate Spanish-language proficiency through an assessment administered by a General Services Administration-approved vendor, and whose sites confirm that the applicant will provide Spanish speaking services to limited English proficiency patients.

The information is needed to determine applicants are in compliance with requirements of the NHSC LRP contract and that the evidence submitted is satisfactory to the Secretary before entering into an agreement for repayment of eligible undergraduate and/or graduate educational loans.

3. Use of Improved Information Technology

This information collection activity is fully web-based. The NHSC LRP Application, application instructions and program information are available on the NHSC web site at <http://nhsc.hrsa.gov/loanrepayment/index.html>. The NHSC Site Application and Recertification Application is an interactive, online-based application which is fully accessible through the NHSC web site at <http://nhsc.hrsa.gov/sites/>. The NHSC Comprehensive Behavioral Health Services Checklist is accessible via the NHSC web site at <https://nhsc.hrsa.gov/sites/default/files/nhsc/nhsc-sites/nhsc-site-reference-guide.pdf>.

4. Efforts to Identify Duplication and Use of Similar Information

The information requested in the NHSC LRP Application, the NHSC Site Application and Recertification Application, and the NHSC Comprehensive Behavioral Health Services Checklists are specific to the applicant and unique to this program. The NHSC Site Application and Recertification Application is the only known mechanism for collecting site specific information that can be used for determining site eligibility, except for data collected through site visits conducted by the NHSC Division of Regional Operations (DRO).

5. Involvement of Small Businesses or Other Small Entities

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

6. Consequences of Collecting the Information Less Frequently

The selection process for the NHSC LRP applicants necessitates the collection of required data prior to the NHSC entering into a contract for repayment of a clinician's qualifying education loans. In the absence of collecting these data, review, selection, and approval of qualified applicants cannot be carried out. The NHSC LRP requests the information once each fiscal year until an applicant is awarded an NHSC LRP contract.

The selection process for NHSC sites necessitates the collection of required data prior to NHSC participants being allowed to serve at facilities providing behavioral health, oral health, and primary health care services to ensure the sites are eligible entities in which NHSC can provide medical care to underserved populations. Once approved, these sites are required to submit a recertification application every 3 years to ensure adherence to program policy and guidelines.

The collection of data through the NHSC Comprehensive Behavioral Health Services Checklist is necessary from current NHSC-approved sites every three years when these sites complete the NHSC site recertification application to ensure that the sites either provide behavioral health care services or are affiliated with a facility providing behavioral health care services.

If the information were collected less frequently, the NHSC could not adequately evaluate sites and determine their eligibility to be approved NHSC sites for NHSC participant placement or transfer.

7. Special Circumstances Relating to the Guidelines in 5 CFR 1320.5 (d)(2)

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

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

The 60-day notice required in 5 CFR 1320.8(d) was published in the *Federal Register* on January 23, 2024, Vol. 89, No.15; pp. 4317-18. There were no public comments. The 30-day notice was published in the *Federal Register* on April 10, 2024, Vol. 89, No.70; pp. 25272-73.

The program has surveyed a total of nine individual applicants to the NHSC LRP to obtain constructive feedback to improve the application, improve efficiency, and minimize the collection burden. There were no suggestions for changes or revisions.

9. Explanation of any Payment/Gift to Respondents

Respondents will receive no remuneration.

10. Assurance of Confidentiality Provided to Respondents

Data will be kept private to the extent allowed by law. Data collected on the individual NHSC LRP Application and the NHSC Site Application and Recertification Application are stored in a system of records as defined under the Privacy Act of 1974. The application is included in the System of Records Notice, “The Public Health Service and National Health Service Corps Health Care Provider Records System” (09-15-0037). Information provided on each selected application will be maintained for at least 2 years and up to 10 years to permit the monitoring of NHSC LRP participants through the completion of their NHSC LRP 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 NHSC 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.

11. Justification for Sensitive Questions

Questions regarding race and ethnicity are asked in the online application; however, responses to these questions are optional. Updated SPD-15 guidance on race and ethnicity data collection is not incorporated because the instruments were developed prior to the guidance being disseminated. Incorporating the guidance on this stage would jeopardize timely implementation of NHSC application updates. Updates will be made to this collection to align with revised SPD-15 guidance by 2027.

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).

12. Estimates of Annualized Hour and Cost Burden

12.A. Estimated Annualized Burden Hours

Form Name	Number of Respondents	Number of Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
NHSC LRP Application	9,020	1	9,020	1.00	9,020

Form Name	Number of Respondents	Number of Responses per Respondent	Total Responses	Average Burden per Response (in hours)	Total Burden Hours
Authorization for Disclosure of Loan Information Form	7,150	1	7,150	0.10	715
Privacy Act Release Authorization Form	303	1	303	0.10	30
Verification of Disadvantaged Background Form	660	1	660	0.50	330
Private Practice Option Form	330	1	330	0.10	33
NHSC Comprehensive Behavioral Health Services Checklist	4,400	1	4,400	0.13	572
*NHSC Site Application (including recertification)	4,070	1	4,070	0.50	2,035
NHSC Spanish Language Assessment Proficiency Test Form	3,006	1	3,006	0.50	1,503
Total	28,939	----	28,939	----	14,238

*The respondent for this instrument is the health care facility where the applicant/participant fulfills his/her service obligation providing primary care health services.

The program estimates that the number of NHSC LRP applicants/respondents will average approximately 9,020 per year for the next 3 years. Each applicant must complete an online application once per fiscal year until they are awarded a NHSC LRP contract. The form takes approximately 1 hour to complete, for a total burden of 9,020 hours. The number of NHSC LRP Application respondents and average burden per response reflect an average of data collected over a period of 3 years. 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.

Program estimates that the number of applicants/respondents with the Authorization for Disclosure of Loan Information Form will average 7,150 per year for the next 3 years. The form takes approximately 6 minutes to complete, for a total burden of 715 hours. The number of NHSC Disclosure of Loan Information Form responses and average burden per response reflects an average of data collected over a period of 3 years.

Program estimates that the number of applicants/respondents with a Privacy Act Release form will average 303 per year for the next 3 years. The form takes approximately 6 minutes to complete for a total burden of 30 minutes. The number of NHSC Privacy Act Release form respondents and average burden per response reflect an average of data collected over a period of 3 years.

Program estimates that the number of applicants/respondents with the Information on Verification of Disadvantaged Background Form will average 660 per year for the next three years. The form takes approximately 6 minutes to complete, for a total burden of 330 hours. The number of NHSC Verification of Disadvantaged Background Form respondents and average burden per response reflects an average of data collected over a period of 3 years.

Program estimates that the number of applicants/respondents with the Information on Private Practice Option Form will average 330 per year for the next three years. The form takes approximately 30 minutes to complete, for a total burden of with 33 hours. The number of NHSC Private Practice Option Form respondents and average burden per response reflects an average of data collected over a period of 3 years.

The number of NHSC Comprehensive Behavioral Health Services Checklist is an estimate of the number of existing NHSC and potential applicant sites expected to complete the instrument which is approximately 4,400. The checklist averages approximately 8 minutes to complete by a site administrator or designated site official. The number of NHSC Comprehensive Behavioral Health Services Checklist respondents and average burden per response reflect an average of data collected over a period of 3 years.

Program estimates that the number of applicants/respondents with the Information on Spanish Language Assessment Proficiency Test Form will average 3,006 per year for the next 3 years. The form takes approximately 30 minutes to complete, for a total burden of 1,503 burden hours.

Program estimates the number of NHSC Site Applications including recertification applications will average approximately 4,070 per year for the next 3 years (2,800 for new applications per year and 1,270 for recertification applications per year). The information requested takes approximately 30 minutes to complete by a site administrator or designated site official. The number of NHSC Site Application respondents and average burden per response reflect an average of data collected over a period of 3 years.

12. B. Estimated Annualized Burden Costs

Type of Respondent	Total Burden Hours	Hourly Wage Rate (median wage, adjusted for overhead costs)	Total Respondent Costs
NHSC LRP Applicant	9,020 ¹	*\$203.18	\$1,832,683.60
Health Care Facility	2,035 ²	**\$100.80	\$205,128
Total	11,055		\$2,037,811.60

*Based on the median hourly wage of Family and General Practitioners data at <https://www.bls.gov/oes/current/oes291215.htm>. This occupation was selected because Family and General Practitioners would be the occupation that would be the most likely to complete NHSC LRP application forms and accompanying forms.

**Based on the median hourly wage of Medical and Health Service Managers data at <https://www.bls.gov/oes/current/oes119111.htm>. This occupation was selected because Medical and Health Service Managers would be the occupation that would be the most likely to complete NHSC site application forms and accompanying documents.

There are no capital or start-up costs nor are there any operation and maintenance costs.

13. Estimates of other Total Annual Cost Burden to Respondents or Record Keepers/Capital Costs

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

¹ This figure represents the full amount of respondent hours, as certain documents are submitted by a subset of respondents consistent with program requirements.

² *Ibid.*

14. Estimates of Annualized Cost to the Government

Instrument	Base Pay Rate (adjusted for overhead costs) ³	Project Time per FTE	Number of FTEs	Total Annual Cost
NHSC Loan Repayment Program Online Application Contract	\$ 148,800/ (GS-12, Step 1)	.25	26	\$967,200
NHSC Site Application including Recertification	\$ 148,800/ (GS-12, Step 1)	.025	41	\$152,520
NHSC Behavioral Health Services Checklist	\$ 148,800/ (GS-12, Step 1)	.005	41	\$30,504
Total				\$1,150,224

Processing of the NHSC LRP applications and supporting forms (Authorization for Disclosure of Loan Information Form, Privacy Act Release Authorization Form, Verification of Disadvantaged Background Form, Private Practice Option Form) is handled internally through the BHW Business Management Information System Solution (BMISS) and by NHSC LRP staff. There are 26 FTEs involved in the processing of the applications. The cost for staff to process the applications and facilitate the loan repayment process for 26 GS-12, Step 1 employees at .25 full-time equivalent (FTE) rate is \$967,200. The total estimated annual cost to the Government for the NHSC LRP application and application contract is \$967,200.

Both the NHSC Site Application and Site Recertification Applications in addition to the Behavioral Health Checklist are reviewed and processed internally by DRO staff with an average base pay rate of \$99,200 (equivalent to a GS-12, Step 1 at 2024 base pay rate level). Approximately 41 DRO staff participate in reviewing the NHSC site applications including recertification applications at a rate of 41 GS-12, Step 1 employees at .025 FTE rate is \$152,520.

Project time spent on the processing activity increased and resulted in an increase of the total annual cost to the government due the time needed to process and review the Behavioral Health Checklist. Approximately 41 DRO staff participate in reviewing the NHSC Behavioral Health Services Checklist at a rate of 41 GS-12, Step 1 employees at .005 FTE rate is \$30,504.

The grand total of costs to the government for all the instruments will be \$1,150,224.

15. Explanation for Program Changes or Adjustments

³ Table updated based off of OPM Salary Table 2024-DC - <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB.pdf>. Base Salary of \$99,200 multiplied by 1.5 to account for overhead costs.

The estimated total burden hours for this activity are 14,238 hours. The current burden inventory is 12,735 hours. The estimated burden hours percentage change from the current Notice of Action to the revised estimated burden hours reflects an increase of 11.8 percent which is a difference of 1,503 hours. The increase in proposed burden hours is due to the inclusion of the NHSC Spanish Language Assessment Proficiency Test Form.

For this revision, a NHSC Spanish Language Assessment Proficiency Test Form was added to assess an applicant's proficiency in speaking Spanish, to directly provide culturally Spanish speaking services to limited English proficiency patients.

16. Plans for Tabulation, Publication, and Project Time Schedule

Statistical data related to the NHSC LRP has been published and can be obtained at the following website: <https://data.hrsa.gov/data/download?data=SCH#SCH> (see "BHW Program Applicant and Award Data" and "National Health Service Corps, Nurse Corps, and Substance Use Disorder Treatment and Recovery and other Programs" dropdown menus). Data is published at the end of each fiscal year upon reconciliation of awards data on October 1st. Data regarding Spanish language proficiency (i.e., quantifications of practitioners that demonstrate proficiency, receive one-time award enhancement, and offer Spanish-speaking services) will be added starting in FY 2025.

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

No exemption is requested.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.