

**SUPPORTING STATEMENT FOR 2900-0205
APPLICATION FOR HEALTH PROFESSIONS TRAINEES, VA FORM 10-2850D
EXPIRATION DATE 08/31/2022**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

VA Form 10-2850D, Application for Health Professions Trainees, is designed specifically to elicit appropriate information about qualifications for each trainee participating in accredited educational programs with the Department of Veterans Affairs (VA). The 10-2850D form is used by all health professions trainees, including physician and dentist residents.

The collection of this information is authorized by 38 U.S.C. 7403, (Veterans' Benefits), which provides that appointments of Title 38 employees will be made only after qualifications have been satisfactorily verified in accordance with regulations prescribed by the Secretary. Occupations listed in 38 U.S.C. 7401(1) and 7401(3) (Appointments in Veterans Health Administration) are appointed at a grade and step rate or an assignment, based on careful evaluation of their education and experience.

The Veterans Health Administration (VHA) conducts education and training programs through partnerships with affiliated academic institutions and through VHA's own sponsored programs. Qualified health care professionals with appropriate credentials and privileges supervise trainees. The process of progressive responsibility in the clinical environment is the underlying educational principle for all medical and health professional education, regardless of specialty or discipline. Under authority of 38 U.S.C. Chapter 73, residents are appointed at a postgraduate level commensurate with their education and professional experience. 38 U.S.C 7302 (Functions of Veterans Health Administration: health-care personnel education and training programs) mandates that VHA assist in the training of health professionals for its own needs and for those of the nation.

The VA Form 10-2850D application will collect information from health professions trainees prior to VA appointment. All health professions trainees must provide information concerning their background, training, education, degrees, licensure, registrations, and other vital information to ensure appropriate qualifications for VA assignment.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

All health professions trainees must provide information concerning their citizenship, immigrant, non-immigrant or exchange visitor status, training and education, as well as previously held licenses and registrations. This information will be reviewed by VA officials to determine whether it indicates a history of adverse licensure action, malpractice claims, action against hospital privileges, or other adverse actions that may warrant a more comprehensive review with additional information. The review will guide VA officials in the determination to grant or deny an appointment to Federal Service.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also described any consideration of using information technology to reduce burden.

SUPPORTING STATEMENT FOR 2900-0205, Continued

The trainee information may be entered electronically by the individual trainees. The *.pdf version of VA Form 10-2850D is available on <http://vaww.va.gov/forms/medical/searchlist.asp>. All forms are in a fill and print mode. VA is also investigating the potential for web-based information technology (specifically an application portal) for the collection of this information.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

VA Form 10-2850D is an application specific to health professions trainees appointed under Title 38. There is no other source specific to health professions trainees that is accessible to VA management and personnel officials charged with making appointment determinations. The VA Form 10-2850D will assist VA to be compliant with key screening requirements for trainees, with less of a burden on trainees and VA officials responsible for the screening process. Only trainees that meet established qualifications and security requirements based on the information in form 10-2850D will be appointed to VA.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

N/A

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Title 38 U.S.C. 7403 provides that appointments of Title 38 individuals will be made only after qualifications have been satisfactorily established in accordance with regulations prescribed by the Secretary. If the information were not collected, qualifications of applicants or trainees could not be assessed and appointments could not be made to VA Medical Centers. The information must be collected in order to meet screening requirements. Without the information, appointment of trainees would not be possible, preventing VHA from completing the statutory requirements mandated by 38 U.S.C. 7302.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; 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 and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no such special circumstances.

8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

SUPPORTING STATEMENT FOR 2900-0205, Continued

The 60-day notice of Proposed Agency Information Collection Activity was published in the Federal Register on May 6, 2019 (84 FR 19830-19831). We received no comments in response to this notice.

The 30-day notice of Agency Information Collection Activity under OMB Review was published in the Federal Register on July 18, 2019 (84 FR 34476). We have received no comments to date in response to this notice.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances that preclude consultation every three years with representatives of those from whom information is to be obtained.

These forms are routinely reviewed to assure that all elements essential for hospital accreditation and credential verification are included. This assures the safety requirements of VA patients are adequately addressed. Comments of candidates for VA employment about these application forms are considered on a continuing basis. Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift is provided to respondents.

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The Privacy Act Notice on these forms indicates that information is requested under Title 38, (U.S.C.). Information provided may be released by the Agency under certain circumstances described in the Notice. Records are maintained in the system identified as "Applicants for Employment under Title 38, U.S.C.-VA" (02VA135), in the 2003 Compilation of Privacy Act Issuances via online GPO access at http://www.access.gpo.gov/su_docs/aces/2003_pa.html.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

a. Total annual burden hours are estimated at 60,500 hours.

Form	Total Respondents	Frequency	Annual # Responses	Min.	Annual Burden
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SUPPORTING STATEMENT FOR 2900-0205, Continued

					Hours
10-2850D	121,000	1	121,000	30	60,500

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I.

One form only.

c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

VHA uses general wage data to estimate the respondents' costs associated with completing the information collection. In accordance with the Bureau of Labor Statistics (BLS) May 2018 Occupational Wage Code Median Hourly, the mean hourly wage is \$24.98 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website: https://www.bls.gov/oes/2018/may/oes_nat.htm.

Legally, respondents may not pay a person or business for assistance in completing the information collection, and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs.

VHA estimates the total annualized cost to respondents to be \$1,511,290.00 VA does not require any additional recordkeeping.

The specific breakdown is summarized below:

Form No.	Burden Hours	Cost per Hour	Total
10-2850D	60,500	\$24.98	\$1,511,290

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- a. There are no capital, start-up, operation or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
- c. There are no anticipated capital start-up cost components or requests to provide information.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Cost to the Federal Government is estimated at:

10-2850D	\$1,968,650
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SUPPORTING STATEMENT FOR 2900-0205, Continued

Key to Interpreting Cost Data		
P/D - DEO	Physician/Dentist – Designated Education Officer	\$75/hour
PMS	Personnel Management Specialist (GS 11/4)	\$30/hour

Processing:	121,000 applications x 5 min x \$75/hr for review and signature by DEO	\$756,250
	121,000 applications x 20 min x \$30/hr for review of a PMS or DEO Administrative Staff	\$1,210,000
Printing/Distribution		\$2,400
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		\$1,968,650

15. Explain the reason for any program changes or adjustments reported in Items 13 or 14.

Only the DEO and DEO staff review the VA 10-2850D, reducing the cost to the Federal Government by \$4,984,108.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no plans to publish the results of the information collected.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

VA does not seek to omit the expiration date.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB 83-I.

There are no such exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used in this data collection.