

July 20, 2011

Health Resources Services Administration
Reports Clearance Officer
Room 10-29, Parklawn Building
5600 Fishers Lane
Rockville, MD 20857

To Whom It May Concern:

The undersigned members of the Federation of Associations of Schools of the Health Professions (FASHP) write in response to the notice “Agency Information Collection Activities: Proposed Collection: Comment Request” published in the May 20, 2011 *Federal Register* (76 FR 29251-29252). Created in 1968 as a forum for representatives from organizations of health professions education, FASHP addresses education’s role in organizational matters of health care, encourages effective collaboration among the health professions in education and practice, and prepares health professionals for the future. FASHP promotes health professions training programs, such as Titles VII and VIII, and programs related to education financing.

FASHP welcomes the opportunity to comment on the Health Resources and Services Administration’s (HRSA) proposed revision to the Bureau of Health Professions (BHP) Performance Report for Grants and Cooperative Agreements (OMB No. 0915-0061). As strong supporters of HRSA’s health professions workforce programs, FASHP member organizations and the institutions they represent applaud HRSA’s goals of streamlining the reporting process and updating information collection efforts in a way that allows meaningful, consistent assessments of the programs’ successes. These objectives align with the emphasis on measuring the long-term impact of the programs when the Title VII and VIII programs were reauthorized through the Affordable Care Act (P.L. 111-148 and P.L. 111-152). The law included an important component to achieving these goals – the authority for the Secretary of Health and Human Services to supplement individual grants for this purpose – and we strongly recommend that HRSA employ that authority to enable grantees to comply with any additional, resource-intensive reporting requirements.

We also commend HRSA for seeking input on “the accuracy of the agency’s estimate of the burden of the proposed collection of information,” and “ways to minimize the burden of the collection of information on respondents,” among other requests for feedback. We look forward to working with HRSA to implement the longitudinal evaluations (and associated data collection efforts) in a timely and efficient manner. Our ability to respond constructively to the agency’s request, however, will require an opportunity to review specifics of the proposal presented to grantees in recent technical assistance calls. As such, we respectfully request an extension of 60 days from the comment period deadline of July 20, 2011 to allow FASHP members to consider these new details and consult grantees about the expected burden of the individual-level data collection proposals and other new reporting requirements to determine if further feedback is necessary.

We are confident that additional time to allow a more thorough assessment of the proposal will help meet our mutual goal: implementing a data collection mechanism that strengthens HRSA's health care workforce programs without imposing an unreasonable burden on grantees or the agency. Thank you for considering our request.

Sincerely,

American Association of Colleges of Nursing
American Association of Colleges of Osteopathic Medicine
American Association of Colleges of Pharmacy
American Dental Education Association
Association of American Medical Colleges
Association of American Veterinary Medical Colleges