

**From:** [Jack Karsten](#)  
**To:** [HRSA Paperwork](#)  
**Subject:** [EXTERNAL] Public Comment, Bureau of Health Workforce Performance Data Collection  
**Date:** Monday, December 4, 2023 1:08:52 PM  
**Attachments:** [Public Comment.pdf](#)

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Hello,

I have attached a public comment for the Information Collection Request listed below. I look forward to reading your response.

**Title:** Bureau of Health Workforce Performance Data Collection  
**OMB No.** 0915-0061-Revision

Best regards,  
Jack Karsten

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***Jack Karsten***

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December 4, 2023

Joella Roland, Esq.  
Information Collection Clearance Officer  
Health Resources and Services Agency  
Room 14N136B  
5600 Fishers Lane  
Rockville, MD 20857

Dear Ms. Roland:

I am pleased to submit my comments and questions on the **Bureau of Health Workforce Performance Data Collection, OMB No. [0915-0061](#)—Revision**. I am a Graduate Research Assistant at the George Washington Institute of Public Policy, where my colleagues and I are working on a [project to assess the data collected by workforce programs](#) across federal agencies. We believe that HRSA's work to improve the quality of program performance data is not only important for training health workers, but for training workers in all critical fields. Your agency's efforts to consolidate performance data into one collection not only allows for easier comparisons among Bureau of Health Workforce programs, but also similar workforce programs outside of the Department of Health and Human Services. With this revision, I suggest that HRSA consider the following ways to **remove barriers to comparing workforce data**:

- **Coordinate data collection** on workforce program with agencies outside HHS
- **Use common definitions** of credentials and work experience programs like apprenticeships
- **Publish data** on program entries, exits, and skills/credentials earned in an online database

The Bureau of Health Workforce is one of many workforce agencies spread across the federal government. My team [counted federal workforce programs](#) and found over 80 located in 10 cabinet level departments and independent agencies. With no single agency leading these efforts, I am submitting comments as part of the OMB approval process **to encourage your agency to collaborate with other agencies on workforce data collection**. I see a great opportunity to eliminate duplication of effort and share knowledge across agencies.

**Apprenticeships could be one potential collaboration** for HRSA to consider. The [60-day Federal Register Notice](#) mentions newly added questions on apprenticeships, which could be matched with information collections in other agencies to expand [databases on federally-funded apprenticeship programs](#). HRSA's definition of apprenticeships in the healthcare context may differ from other agencies, especially among other types of healthcare work experience programs. Your agency could **save time and effort by adapting existing definitions of apprenticeships** to HRSA programs in a way that makes collected program data comparable across agencies.

Finally, I suggest that HRSA expand its [dashboard for health professions training programs](#) into a database that give individual-level detail about

- 1) who enters these programs;
- 2) what experience, skills, and credentials they gain along the way; and
- 3) where participants go to work after program completion.

Databases such as the DOL Employment and Training Administration's [Participant Individual Record Layout](#) that tracks WIOA program participants could serve as a model. Publishing more data on the career paths of participants could help researchers like me, policymakers like you, and prospective workers **create more employment opportunities in the healthcare workforce.**

In closing, I request that you respond to the following questions:

1. How does the Health Resources and Services Agency plan to **collaborate on data collection with workforce agencies** outside the Health and Human Services Department? There's an enormous opportunity to eliminate duplication of effort and share knowledge across agencies.
2. How does HRSA **define apprenticeships** within the context of the healthcare workforce? How does that definition differ from other work experience programs in healthcare, and does it align with definitions from other workforce agencies? The agency could save time and effort by adapting existing definitions of apprenticeships to HRSA programs in a way that makes collected program data comparable across agencies.
3. What are HRSA's plans to expand its online data dashboards into a **database of entries, exits, and skills/credentials gained by participants** in grant-funded health workforce programs? Publishing more data on the career paths of participants could help create more employment opportunities in the healthcare workforce.

I am free to discuss my comments and questions with you. **Please contact me by e-mail** at [karsten@gwu.edu](mailto:karsten@gwu.edu) with any responses or to arrange a meeting. I look forward to reading the responses sent to OMB. Thank you for your consideration.

Best regards,



**Jack Karsten**

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