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Laurel S. Havas
Office of Information and Regulatory Affairs
Eisenhower Executive Office Building
1650 Pennsylvania Avenue, NW
Washington, DC 20503

Dear Laurel:

I am pleased to submit my comments to the Office of Information and Regulatory Affairs on the **Bureau of Health Workforce Performance Data Collection, OMB No. [0915-0061](#)**. I am a PhD student working with 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 **if that data can be shared across agencies**. Also important is OIRA's efforts to coordinate information collection requests across agencies to reduce the time burden on respondents and financial burden on taxpayers. To that end, I request that OIRA approve this ICR with additional terms of clearance.

In its [30-day notice for this data collection](#), HRSA explained that the data was only used for reporting performance metrics of grant programs. Furthermore, statute prevents HRSA from reporting individual-level data. While I commend the agency for its adherence to privacy provisions, the agency has **evidence-building goals and overarching strategic goals** as well. I view the OMB clearance process as an opportunity for HRSA to explain how it plans to fulfill strategic goals using this data collection while still observing privacy mandates. Beyond the agency, OIRA has an interest in expanding the use of evidence collected by agencies to reduce the response burden of multiple data collections.

In their [strategic plan for FY2022-2026](#), The Department of Health and Human Services lists strategic objective 1.5 to "bolster the healthcare workforce". The grant programs that this data collection measures do a good job of targeting health professional shortage areas that the agency identifies. However, the opportunity remains for the data to **bolster the healthcare workforce more broadly**. Sharing information about what leads to success in healthcare training programs could lead prospective workers into the field or help those starting out to upgrade their skills to fill needed occupations. In this way, grant performance data could inform a broader strategy for training more healthcare workers.

There are many other agencies that might benefit from the data collected from these grant programs. 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 clearance process **to encourage agencies to collaborate on workforce data collection**. I see a great opportunity to serve multiple strategic objectives at once by reducing the time and cost of data collections and gathering evidence to fulfill agency goals.

HRSA could explore ways to share the information it collects with other agencies working on workforce issues while complying with its privacy mandates. For example, HRSA may have data on training a healthcare workforce that the Department of Labor could leverage as it funds training programs for high-grow occupations in that sector. Likewise, the Department of Veterans Affairs runs a geographically dispersed network of hospitals, and may have information to how develop a healthcare workforce in medically underserved areas. These are only a few possibilities to explore; please refer to the count of federal workforce programs to discover other potential collaborations.

Considering the proceeding, I request the following conditions of clearance be added:

1. HRSA should explain to OMB on **how this data collection helps meet strategic goals** for the Department of Health and Services, especially Goal 1.5 to “bolster the health workforce”, while continuing to comply with the agency’s privacy mandates.
2. **Invite public comment on HRSA’s approach to collaboration with other agencies**
 - a. HRSA should look to collaborate with other agencies with workforce programs, especially those with a mission to develop the healthcare workforce.
 - b. HRSA should report to OMB within 180 days of receiving clearance with a plan for how it plans to collaborate with agencies outside of HHS.
 - c. Like the rest of the ICR clearance process, the suggested approach to interagency collaboration on data collection should undergo public comment into order to get feedback from the broadest range of interested stakeholders.

I am free to discuss my comments with you. **Please contact me by e-mail** at karsten@gwu.edu with any responses or to arrange a meeting. I look forward to reading any conditions of clearance. Thank you for your consideration.

Best regards,



Jack Karsten

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