## SUPPORTING STATEMENT FOR FORM SSA-3192 MEDICAL PARKING APPLICATION

41 CFR 101.20-104.2

## OMB No. 0960-0624

## A. Justification

1. An individual who has a "disability" which substantially limits his or her ability to walk may request a special parking assignment for SSA-managed and SSA-controlled property and for property assigned to SSA by the General Services Administration or any other government agency. *41 CFR 101.20-104.2* provides authority for assignment of special parking based on medical opinion.

To obtain a special parking assignment, an individual must have his or her physician complete form SSA-3192, the Medical Parking Application. This form collects medical information on the nature, severity, duration, and impact of the condition or impairment. In addition, SSA asks the physician to submit substantiating evidence, such as physician office notes, x-ray reports, MRI reports, pulmonary function test, or other medical testing results. SSA requires that the documentation be sent to the Public Health Physician (who makes decisions for SSA regarding eligibility for Medical Parking) directly from the physician's office.

- 2. Once the applicant's physician has completed form SSA-3192, the form is sent to SSA's Public Health Physician, who uses this information to determine eligibility for a special parking permit. If it is determined that eligibility requirements have been met, SSA grants the applicant special parking privileges.
- 3. Form SSA-3192 is not scheduled for electronic implementation under the agency's Government Paperwork Elimination Act plan due to its low volume of usage.
- 4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected by form SSA-3192.
- 5. This collection does not impact small businesses or other small entities.
- 6. If this information were not collected, SSA would be unable to consider employees for special medical parking privileges. It cannot be collected less frequently, since it is only collected once (i.e. when the employee initially requests special parking).

There are no technical or legal obstacles that prevent burden reduction.

- 7. There are no special circumstances that would cause this information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.
- 8. The 60-day advance Federal Register Notice was published on January 4, 2007 at 72 FR 357, and SSA received no public comments. The second Notice was published on March 15, 2007 at 72 FR 12244, and SSA received no public comments.

There have been no outside consultations with members of the public.

- 9. SSA provides no payment or gifts to the respondents.
- 10. The information provided on this form is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974), and OMB Circular No. A-130.
- 11. Form SSA-3192 collects medical information about the applicant's disability which is potentially sensitive. However, this information is necessary because it is the basis for the Public Health Physician's decision about the applicant's eligibility for special parking privileges.
- 12. Approximately 144 SSA employees request special parking privileges annually, and it takes their physicians an estimated 60 minutes to complete form SSA-3192. Therefore, the total burden is 144 hours. The total burden is reflected as burden hours, and no separate cost burden has been calculated.
- 13. There is no known cost to the respondents.
- 14. The annual cost to the Federal Government is approximately \$103,620. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
- 15. There is no change in the public reporting burden.
- 16. The result of the information collection will not be published.
- 17. OMB has granted SSA an exemption from the requirement that the expiration date for OMB approval be printed on its forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB clearance. SSA does not periodically revise and reprint its public-use forms, (e.g., on an annual basis). This exemption was granted so that otherwise useable editions of forms would not be taken out of circulation because the expiration date had been reached. In addition, government waste has been avoided because stocks of forms will not have to be destroyed and reprinted.
- 18. SSA is not requesting an exception to the certification requirements at 5 CFR 1320.0 and related provisions at 5 CFR 1320.8(b)(3).

## **B.** Collections of Information Employing Statistical Methods:

Statistical methods are not used for this information collection.