# SUPPORTING STATEMENT FOR FORMS SSA-3192, SSA-3193, AND SSA-3194 MEDICAL PERMIT PARKING APPLICATION FORMS

#### 41 CFR 101.20-104.2

#### OMB No. 0960-0624

### A. Justification

- 1. As per section *41 CFR 101.20-104.2* of the *Code of Federal Regulations*, Social Security Administration (SSA) employees and contractors with qualifying medical conditions who park at SSA-owned and -leased facilities are eligible to apply for an SSA medical parking permit. SSA uses three forms as part of this program: form SSA-3192, the Application and Statement (the person seeking the permit completes this when they first apply for the medical parking space); form SSA-3193, the Physician's Report (the applicant's physician completes this to verify the medical condition and also provides medical evidence that supports the diagnosis); and form SSA-3194, the Renewal Certification (medical parking permit holders complete this to verify their continued need for the permit). The respondents are SSA employees and contractors seeking medical parking permits and their physicians. **NOTE**: Because SSA employees are federal workers and are PRA-exempt, this ICR is only for 1) SSA contractors and 2) physicians (of both SSA employees and contractors).
- 2. SSA uses the information provided by these forms to identify the SSA employee/contractor who wants a medical parking permit, and to determine if that employee is entitled to the permit based on their medical condition.
- 3. We did not create electronic versions of forms SSA-3192, SSA-3193, SSA-3194 under the Agency's Government Paperwork Elimination Act due to their low volume of use.
- 4. The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. We do not have any other collection instruments that collects similar data.
- 5. This collection does not affect small businesses or other small entities.
- 6. If we did not have this information collection, we would be unable to assign medical parking permits for qualifying SSA employees/contractors, which would violate the regulations cited in Question #1. Since we only collect this information when an employee/contractor initially applies for a permit or submits the required annual confirmation of need, we cannot collect it less frequently.

There are no technical or legal obstacles to burden reduction.

7. There are no special circumstances that would cause us to collect this information in a manner inconsistent with 5 CFR 1320.5.

8. SSA published the 60-day advance Federal Register Notice on March 28, 2008, at 73 FR 16734, and we received no public comments. We published the 30-day Federal Register Notice on May 28, 2008, at 73 FR 30656. If we receive any public comments in response to the 30-day Notice, we will forward them to OMB.

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

- 9. SSA provides no payment or gifts to the respondents.
- 10. SSA protects and holds confidential the information from this form 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. The respondents for these forms must provide medical information which could be considered sensitive. However, SSA needs this information to determine if the applicant qualifies for a medical parking permit, and we do not share the information with anyone outside of the SSA physician who makes the eligibility determination.
- 12. Below is the annual reporting burden for these forms. Note that this burden is for contractors and physicians only, since SSA employees are PRA-exempt. The total burden is reflected as burden hours, and we did not calculate a separate cost burden.

**NOTE:** Please note that since publishing the Federal Register Notices for this ICR, we received updated burden data. The chart below presents the correct data.

Form	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
SSA-3192	75	1	30	38
SSA-3193	400	1	90	600
SSA-3194	500	1	5	42
Totals	975	•	-	680

- 13. There is no known cost burden to the respondents.
- 14. The annual cost to the Federal Government for conducting this collection 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. The public reporting burden increased from 144 to 380 burden hours. This increase was caused by 1) the addition of form SSA-3193 (previously, only SSA employees' physicians were included in this ICR) and 2) the addition of form SSA-3194, which is a new form.

- 16. SSA will not publish the results of the information collection.
- 17. OMB exempted SSA from publishing the expiration date for OMB approval 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). OMB granted this exemption so that otherwise useable editions of forms would not be taken out of circulation because the expiration date had been reached. In addition, we avoid government waste because we do not have to destroy and reprint stocks of forms.
- 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. <u>Collections of Information Employing Statistical Methods:</u>

SSA does not use statistical methods for this information collection.