

## SUPPORTING STATEMENT – PART A

### A. JUSTIFICATION

#### 1. Need for the Information Collection

Information collection needed to track, monitor, review, and process requests for reasonable accommodations for employees, contractors, and applicants for employment. The authority to collect this information is granted by the following laws and policy: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; 29 U.S.C. 701, Rehabilitation Act of 1973, Sections 501 and 505; 42 U.S.C. 12101, Americans with Disabilities Act of 1990, Titles I and V; 29 Code of Federal Regulations (CFR) Part 1630, Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act; Executive Order 13163, Increasing the Opportunity for Individuals with Disabilities to Be Employed in the Federal Government; and Executive Order 13164, Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation

#### 2. Use of the Information

The collected information is used to support the U.S. Navy's/EEO process for reasonable accommodation for applicants for employment, civilian employees, and government. The information is used to determine need for reasonable accommodations, type of reasonable accommodations needed, and to track estimated/actual cost of the reasonable accommodation. Respondents are either given a SECNAV 12306/1T to fill in and return to EEO Employee, or EEO Employee ask the question directly to the respondent and enters the responses directly into the DON Reasonable Accommodations Tracker on their behalf.

#### 3. Use of Information Technology

Respondents enter their information on to SECNAV 12306/1T Confirmation of Reasonable Accommodation Request. A EEO Employee enters data into a web-based information system, Reasonable Accommodation Tracker or respondent orally provides the information to a EEO employee who inputs the information on their behalf. Access to specific case files is restricted to individuals having a need to know to perform their official duties. Case records are maintained in locked security containers (Note: DON Reasonable Accommodation Tracker is not online yet, as soon as the Reasonable Accommodation Tracker is online it is expected that 50% of responses will be done electronically. As the system is implemented across the DON this percentage is expected to rise and the need for paper case files will decrease). Only users with a need to know have access to the security containers. Access to electronic records will be limited to users based on their area of responsibility and need to know. Users will not be able to view records outside their user privileges. Electronic records are controlled by limiting physical access to terminals and by the use of passwords. Work areas are sight controlled during normal duty hours.

#### 4. Non-duplication

There is not information already available which can be used, or modified for use, for the purposes of this collection.

5. Burden on Small Business

Not applicable; no burden on small businesses.

6. Less Frequent Collection

Not applicable; collection is not periodic.

7. Paperwork Reduction Act Guidelines

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

A 60-day notice for the proposed collection was posted in the Federal Register on 1/2/2015, 80 FR 36. No comments were received for this notice.

A 30-day notice for the proposed collection was posted in the Federal Register on 10/29/1988, 80 FR 66523.

9. Gifts or Payment

Not applicable; no gifts or payments are associated with the collection.

10. Confidentiality

This system of records contains individually identifiable health information (SORN NM12905-1). SORN NM12905-1 is still awaiting publication and a draft has been submitted to OMB. Revised draft Privacy Impact Assessment (PIA) has been submitted to OMB. The DoD Health Information Privacy Regulation (DoD 6025.18-R) issued pursuant to the Health Insurance Portability and Accountability Act of 1996, applies to most such health information. DoD 6025.18-R may place additional procedural requirements on the uses and disclosures of such information beyond those found in the Privacy Act of 1974 or mentioned in this system of records notice.

Respondents are notified of their privacy rights with a Privacy Act Statement

RETENTION AND DISPOSAL: Destroy three years after employee separation from the agency or three years after all administrative or judicial proceedings are concluded, whichever is later. Destroy three years after an applicant's unsuccessful application for

employment with the agency or three years after all administrative or judicial proceedings are concluded, whichever is later.

.11. Sensitive Questions

This system of records contains individually identifiable health information. The DoD Health Information Privacy Regulation (DoD 6025.18-R) issued pursuant to the Health Insurance Portability and Accountability Act of 1996, applies to most such health information. DoD 6025.18-R may place additional procedural requirements on the uses and disclosures of such information beyond those found in the Privacy Act of 1974 or mentioned in this system of records notice.

Medical information is needed to process reasonable accommodations and therefore must be collected in this system.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

ANNUAL BURDEN HOURS: 33

NUMBER OF RESPONDENTS: 100

RESPONSES PER RESPONDENT: 1

AVERAGE BURDEN PER RESPONSE: 20 minutes (0.33 Hours)

FREQUENCY: Upon Occasion

b. Labor Cost of Respondent Burden

The following labor costs were derived from a Bureau of Labor and Statistics report found here: [http://www.bls.gov/oes/current/oes\\_nat.htm#11-0000](http://www.bls.gov/oes/current/oes_nat.htm#11-0000).

ANNUAL LABOR COST:  $33 * \$46.77 = \$1543.41.00$  (based on General and Operational Managers: \$46.77 from the US Labor website)

13. Respondent Costs Other Than Burden Hour Costs

Not applicable; there are no costs other than burden hours.

14. Cost to the Federal Government

a. Contract costs associated are for contractor costs for website hosting and maintenance – \$15499.92. (Cost provided by sponsor – derived from part of existing contract that covers multiple task)

b. .5 Hrs (30 Min) to process each response for a total time of 50 hours.

c. Federal Labor cost  $50 * \$21.46 = \$1073.00$  (based on OPM GS Pay Schedule GS 6 Step 7 basic)

d. Total burden on Government  $15499.92 + 1073 = 16572.92$

15. Reasons for Change in Burden

N/a. This is a new collection.

16. Publication of Results

Not applicable; the results of the information collection will not be published.

17. Non-Display of OMB Expiration Date

Not applicable; the OMB expiration date will be displayed.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions are necessary.