

SUPPORTING STATEMENT – PART A

Confirmation of Request for Reasonable Accommodation – 0704-0498

A. JUSTIFICATION

1. Need for the Information Collection

The information collection requirement is necessary to obtain and record requests for reasonable accommodation, with the intent to measure and ensure Agency compliance with 29 U.S.C. § 791, Employment of Individuals with Disabilities; E.O. 13164, Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation; EEO MD-715, EEO Reporting Requirements for Federal Agencies.

2. Use of the Information

The information collected will be used by the Reasonable Accommodations Program Manager (RAPM) and the Equal Employment Office Program to track requests for reasonable accommodation to determine whether the agency has implemented timely and effective measures to meet each individual's request. Only one form, "Confirmation of Request for Reasonable Accommodation," SD Form 827, will be used to collect information. The form, which is available on the Washington Headquarters Services (WHS), Human Resources Directorate website is designed for employees and applicants for employment with DoD WHS to provide necessary information to support a request for reasonable accommodation. Applicants may submit the form by email or U.S. Postal Service to the RAPM office. Appropriate privacy disclosures are prominently displayed at the top of the form. No invitations are sent to individuals.

3. Use of Information Technology

Employees and applicants will be able to prepare these forms via a fillable PDF and submit the final product electronically to the RAPM through use of the electronic mail system. This will reduce the use of paper and shorten the time in which a respondent will need to complete the form and submit it for processing. Approximately ninety percent (90%) of responses are collected electronically.

4. Non-duplication

While other components may be collecting this information within the Department, these requests are specific to the employee or applicant applying for job with a WHS-services component. Information from the other components cannot be used because it will not contain enough specificity with which to gage the degree of compliance with applicable guidance, regulations and statutes.

5. Burden on Small Business

The collection of this information does not impact small businesses.

6. Less Frequent Collection

Pursuant to E.O. 13164, EEO MD-715, and 29 U.S.C. § 791, the agency has a requirement to report their efforts towards reasonable accommodation on an annual basis.

7. Paperwork Reduction Act Guidelines

There are no special circumstances to the collection of this data.

8. Consultation and Public Comments

a. The 60 Day Federal Register Notice published May 26, 2016 (81 FR 33493). No comments were received. The 30 Day Federal Register Notice published on July 27, 2016 (81 FR 49215).

b. This form has been coordinated through relevant offices within DoD.

9. Gifts or Payment

No gift or payment will be provided to the respondents.

10. Confidentiality

All medical or disability-related information is collected and maintained by the agency's Reasonable Accommodation Program Manager, and kept confidential in accordance with EEOC regulations. Under 29 C.F.R. § 1630.14(b)(1), such information must be collected, maintained, kept in separate files, and treated as confidential medical records. Medical information obtained in association with a reasonable accommodation request shall be treated as a confidential medical record, except where:

(1) Supervisors and managers must be told about necessary accommodations that may require restrictions on the work or duties of the employee;

(2) First aid and safety personnel must be told if the person with the disability might require emergency treatment;

(3) Government officials investigating compliance with the ADA have requested relevant information;

(4) state workers' compensation laws require employers to disclose information to state workers' compensation offices, state second injury funds, or workers' compensation insurance carriers; and

(5) Employers medical information is used for insurance purposes. 29 C.F.R. pt. 1630 app. §1630.14(b) (1997); Pre-employment Questions and Medical Examinations, supra note 27, at 23, 8 FEP Manual (BNA) 405:7201; Workers' Compensation and the ADA, supra note 52, at 7, 8 FEP Manual (BNA) 405:7394.

The SORN covering this collection of information is DWHS P49, "Reasonable Accommodation Program Records" (<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Article-View/Article/570611/dwhs-p49/>).

The disposition of this form and related documentation is in AI 15, the authority is NARA, GRS 1, No. 24(a) and (b).

11. Sensitive Questions

The form will ask the respondent to provide a description of the reasonable accommodation being requested, and the reason for their request. In so doing, the respondent is being asked specific detailed information about a medical condition that may or may not be sensitive in nature. The respondent will be told that the information collected will not result in any adverse determinations about his or her rights, privileges, or benefits under any Federal program, with the exception of making a determination on whether the employee is eligible to receive a reasonable accommodation.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

The burden estimate was determined by an estimation of the amount of time needed to complete the form, and the number of respondents that the agency anticipates will submit a request for reasonable accommodation over a period of one (1) year.

The estimated annualized burden to respondents is approximately 15 minutes per person, with a total of 20 persons per year: Thus resulting in 5 hours per year.

PUBLIC RESPONDENTS (APPLICANTS, CONTRACTORS AND FOREIGN NATIONALS)

Estimation of Respondent Burden Hours					
	Number of Respondents	Number of Responses per Respondent	Number of Total Annual Responses	Response Time (Amount of time needed to complete the collection instrument)	Respondent Burden Hours (Total Annual Responses multiplied by Response Time) Please compute these into hours)
Collection Instrument #1(Name of collection instrument, i.e. form number)	20	1	20	15 minutes	5
Total	20	1	20	15 minutes	5

b. Labor Cost of Respondent Burden

The assumed average hourly rate of public respondents is equivalent to GS-12, Step 5.

Labor Cost of Respondent Burden					
	Number of Responses	Response Time per Response	Respondent Hourly Wage	Labor Burden per Response (Response Time multiplied by Respondent Hourly Wage)	Total Labor Burden (Number of Respondents multiplied by Response Time multiplied by Respondent Hourly Wage)

SD Form 827	20	15 minutes	\$42.08	\$10.52	\$210.40
Total	20	15 minutes	\$42.08	\$10.52	\$210.40

13. Respondent Costs Other Than Burden Hour Costs

There is no start-up, O&M, or capital costs to respondents.

14. Cost to the Federal Government

The estimated hours per action is based on the time required for the Government to receive, review, analyze, and respond to the information submitted by the respondent for reasonable accommodations. The assumed average hourly rate of HR Specialist is GS-13 Step 5. There are no operations and maintenance costs to the federal government.

PUBLIC RESPONDENTS (APPLICANTS, CONTRACTORS AND FOREIGN NATIONALS)

Labor Cost to the Federal Government		
	SD Form 827	Total
Number of Responses	20	20
Processing Time Per Response (in hours)	8 hours	8 hours
Hourly Wage of Worker(s) Processing Responses	\$50.04	\$50.04
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$400.32	\$400.32

Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses)	\$8,006.40	\$8,006.40
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Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
n/a	n/a	n/a	n/a	n/a	n/a	\$0.00

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$0.00	\$8,006.40	\$8,006.40

15. Reasons for Change in Burden

No change in burden.

16. Publication of Results

The results of the information collection will not be published for statistical use.

17. Non-Display of OMB Expiration Date

The agency is not requesting approval to omit display of the expiration date of OMB approval on the instrument of collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

There are no exemptions to the provisions of the "Certification for Paperwork Reduction Submissions."