

**Supporting Statement for Forms SSA-3192, SSA-3193, and SSA-3194**  
**Medical Permit Parking Application Forms**  
**41 CFR 102-71.20 and 102-74.305**  
**OMB No. 0960-0624**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

As Per Section 41 CFR 102-71.20 and 102-74.305 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 may apply for an SSA medical parking permit.

**2. Description of Collection**

SSA employees and contractors with a qualifying medical condition who park at SSA-owned and leased facilities may apply for, and receive, a medical parking permit. SSA uses three forms for the medical permit parking program: (1) SSA-3192, the Application and Statement, which an individual completes when first applying for the medical parking space; (2) SSA-3193, the Physician's Report, which the applicant's physician completes to verify the medical condition; and (3) SSA-3194, Renewal Certification, which medical parking permit holders complete 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 exempt from the requirements of the Paperwork Reduction Act, the burden below is only for SSA contractors and physicians (of both SSA employees and contractors).

**3. Use of Information Technology to Collect the Information**

Under the Agency's Government Paperwork Elimination Act, we created electronic versions of Forms SSA-3192, SSA-3193, and SSA-3194. In addition, on April 15, 2016, we added an electronic application and renewal process to our Parking Management Module (PMM), in the Security Automated Features and Enhancements (SAFE) web portal, located at: <https://safeopss.ba.ssa.gov/parking>. We still utilize paper forms for employees and contractors that do not have access to SSANet.

**4. Why We Cannot Use Duplicate Information**

The nature of the information we collect and the manner in which we collect it precludes duplication. The PMM utilizes data collected as regular parking applicants; however, SSA does not use any other collection instruments that collect similar medical data.

**5. Minimizing Burden on Small Respondents**

This collection does not affect small businesses or other small entities.

6. **Consequence of Not Collecting Information or Collecting it Less Frequently**  
If we did not use Forms SSA-3192, SSA-3193, and SSA-3194, we would be unable to assign medical parking permits for qualifying SSA employees or contractors. Because we collect the information on an as needed basis, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.
7. **Special Circumstances**  
There are no special circumstances that would cause us to collect this information in a manner inconsistent with 5 *CFR 1320.5*.
8. **Solicitation of Public Comment and Other consultations with the Public**  
SSA published the 60-day advance Federal Register Notice on June 27, 2017, at 82 FR 29136, and we received no public comments. We published the 30-day Federal Register Notice on September 13, 2017 at 82 FR 43066.

We received comments on our 30-day Notice from the U.S. Equal Employment Opportunity Commission stating:

(1) Avoid the specific list of requested medical documentation, the forms are very specific about documentation requested and it's asking for too much proof of disability (such as an actual x-ray report, rather than the doctor's synopsis of it

*SSA agrees to use softer phrasing to ask the doctor to justify the need for medical parking without making a specific list of suggested original documents. An employer does not need direct evidence like office notes when the doctor can draft a summary.*

(2) Eliminate language reminiscent of the outdated standard. The language on the form can be tweaked to avoid using the word "severity" which happens to be a term of art associated with the old standard (which was "significantly restricts," whereas the new more flexible standard is "substantially limits"). EEOC was also concerned about the bold font according to the written comments, but by telephone was eager to concede that this was more of a cosmetic issue.

*SSA agrees to rephrase the term; we will change "severity" of impairment to "degree" or "level" of impairment. We will also eliminate the bold font, which did not particularly enhance the form.*

(3) Broaden "ability to walk." Avoid too tight a focus on "ability to walk" (which could inadvertently exclude a RA for someone with a mental/cognitive issue or a related physical issue like breathing which is a Major Life Activity

SSA agrees to rephrase this, and to put focus on justifying the need for medical parking (not just walking) related to the ability to get from one's vehicle to the duty station.

9. **Payment or Gifts to Respondents**

SSA provides no payment or gifts to the respondents.

10. **Assurances of Confidentiality**

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. **Justification for Sensitive Questions**

SSA requires the respondents for these forms to provide medical information one could consider as 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 contracted physician who makes the eligibility determination.

12. **Estimates of Public Reporting Burden**

Below is the annual reporting burden for these forms based on our current management information data:

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Annual Burden (hours)</b>
<b>SSA-3192</b>	390	1	30	195
<b>SSA-3193</b>	465	1	90	698
<b>SSA-3194</b>	82	1	5	7
<b>Totals</b>	<b>937</b>			<b>900</b>

The total burden for this ICR is 900 hours. This figure represents burden hours, and we did not calculate a separate cost burden of electronic method and paper.

Note: this burden is for contractors and physicians only, since SSA employees are PRA-exempt.

13. **Annual Cost to the Respondents**

There is no known cost burden to the respondents.

14. **Annual Cost to the Federal Government**

The annual cost to the Federal Government for conducting this collection is \$26,719. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; and (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time.

Processing NOTE: The agency maintains a contract with Spectrum Healthcare Resources Incorporated to have a Public Health Services physician process and evaluate these forms in addition to the Federal Government employees. The agency maintains a contract with GCC Technologies, Inc. of which a small part is providing a technician for administrative processing of these forms. We do not include the contract dollar amounts in the annual cost above.

15. **Program Changes or Adjustments to the Information Collection Request**  
The change in burden hours stems from a decrease of respondents using Forms SSA-3192, SSA-3193, and SSA-3194.
16. **Plans for Publication Information Collection Results**  
SSA will not publish the results of the information collection.
17. **Displaying the OMB Approval Expiration Date**  
OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycle exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms, (e.g., on an annual basis), OMB granted this exemption so that SSA would not have to destroy stocks of useable forms with expired OMB approval dates, thus avoiding Government waste.
18. **Exception to Certification Statement**  
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:**

SSA does not use statistical methods for this information collection.