

SUPPORTING STATEMENT - PART A

Department of the Navy (DON) Reasonable Accommodations (RA) Tracker –

OMB 0703-0063

Summary of Changes from Previously Approved Collection

- Collection instrument SECNAV 12306/1 revised (edited Privacy Act Statement, added Agency Disclosure notice, minor redesign)
- Increase in burden due to agency estimates derived from average total number of responses received number of FY16, FY17 and FY18.

1. Need for the Information Collection

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 Department of the Navy's reasonable accommodation process available to civilian employees and applicants for employment.

Respondents submit this form to document their request for reasonable accommodations in order to participate in the application process, to perform the essential functions of his/her position, or to enjoy equal benefits and privileges of employment. The information is used to determine whether the individual has a physical or mental impairment that substantially limits one or more major life activities, and how the accommodation will enable the individual to participate in the application process, perform the essential functions of the position, or enjoy equal benefits and privileges of employment. This information collection serves as the basis for determining the respondents' entitlement to reasonable accommodation per the Rehabilitation Act of 1974, as amended.

The System of Record, the DON Reasonable Accommodations Tracker, serves to electronically document the reasonable accommodation process to ensure timeliness of

requests, and to track estimated/actual cost of reasonable accommodations throughout the DON. Practitioners responsible for facilitating the reasonable accommodation process use the DON Reasonable Accommodation Tracker to electronically document the events that occurred in connection with the processing of the reasonable accommodation request, and as a repository for the electronic documents produced and obtained in connection with the request, to include the SECNAV 12306/1. In addition, the Command Deputy EEO Officers and the DON Office of Equal Employment Opportunity monitor the information entered into the DON Reasonable Accommodations Tracker to oversee compliance with the DON Procedures for Processing Requests for Reasonable Accommodation and applicable federal regulations. Respondents and all other parties do not have access to the DON Reasonable Accommodations Tracker. Respondents are either given a "Confirmation of Reasonable Accommodation Request" SECNAV 12306/1 form to fill in and return to the Equal Employment Opportunity Office (EEO), or the EEO Office asks the SECNAV 12306/1 questions to the respondent and enters the responses directly into the DON Reasonable Accommodations Tracker.

No invitations or solicitations related to the collection are sent to respondents, unless it is a result of the agency being put on notice that the individual is requesting a reasonable accommodation. Per the DON's Procedures for Processing Requests for Reasonable Accommodation, respondents shall receive a decision regarding their reasonable accommodation request within thirty (30) calendar days of the initial request.

3. Use of Information Technology

Approximately 90 percent of respondents enter their information on to SECNAV 12306/1 and an employee in the EEO Office enters data into the web-based information system, Reasonable Accommodation Tracker. Alternatively, it is estimated that 10 percent of respondents orally provide the information to an EEO employee, who documents the oral responses on their behalf. Physical case records are maintained in locked security containers, and electronic documents are stored securely in the DON Reasonable Accommodations Tracker.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

This information is collected on occasion. If this information were collected less frequently, the Department would be unable to determine the need for reasonable accommodations, type of reasonable accommodations needed, and to track estimated/actual cost of the reasonable accommodation. Additionally, a less frequent collection would result in the Department violating Federal laws and policies for Equal Employment Opportunities and civil rights.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Thursday, September 20, 2018. The 60-Day FRN citation is 83 FRN 47613.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, November 23, 2018. The 30-Day FRN citation is 83 FRN 59370.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

The Privacy Act Statement is provided at the top of the SECNAV 12306/1 form.

This collection requires a System of Record Notice (SORN). This collection is covered under N12293-1, "Human Resources Civilian Portfolio." N12293-1 is published and available online at <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Article-View/Article/570405/n12293-1/>.

This collection requires a Privacy Impact Assessment (PIA). This collection is covered under the Human Resources Civilian Portal (HRCP) PIA and is published and available online at <http://www.doncio.navy.mil/exports.aspx?id=11102>.

Records Retention and Disposition Schedule:

Temporary records maintained at naval activities: With the exception of performance records, destroy upon separation or transfer of employee from DON or when 1 year old, whichever is sooner (if employee separates for military service or transfers to another agency as a result of a transfer of function, leave required temporary material in the folder).

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 accommodation requests, and therefore must be collected in this system.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1. SECNAV 12306/1
 - a. Number of Respondents: 2,000
 - b. Number of Responses Per Respondent: 1
 - c. Number of Total Annual Responses: 2,000
 - d. Response Time : 20 minutes
 - e. Respondent Burden Hours: 667 hours

2. Total Submission Burden

- a. Total Number of Respondents: 2,000
- b. Total Number of Annual Responses: 1
- c. Total Respondent Burden Hours: 667 hours

b. Labor Cost of Respondent Burden

1. **SECNAV 12306/1**
 - a. Number of Total Annual Responses: 2,000
 - b. Response Time: 20 minutes

- c. Respondent Hourly Wage: \$48.27
- d. Labor Burden per Response: \$16.09
- e. Total Labor Burden: \$32,180.00

2. Overall Labor Burden

- a. Total Number of Annual Responses: 2,000
- b. Total Labor Burden: \$32,180.00

The Respondent hourly wage was determined by using the Department of Labor, Bureau of Labor Statistics website http://www.bls.gov/oes/current/oes_nat.htm#11-0000.

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

1. SECNAV 12306/1

- a. Number of Total Annual Responses: 2,000
- b. Processing Time per Response: 0.5 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$39.16
- d. Cost to Process Each Response: \$19.58
- e. Total Cost to Process Responses: \$39,160.00

2. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 2000
- b. Total Labor Burden: \$39,160.00

b. Operational and Maintenance Costs

- a. Equipment: \$0.00
- b. Printing: \$0.00
- c. Postage: \$0.00
- d. Software Purchases: \$0.00
- e. Licensing Costs: \$0.00
- f. Other: \$16,126.00
- g. Total: \$16,126.00

1. Total Operational and Maintenance Costs: \$16,126.00
2. Total Labor Cost to the Federal Government: \$39,160.00
3. Total Cost to the Federal Government: \$55,286.00

15. Reasons for Change in Burden

The burden has increased since this information collection request's previous approval. Following implementation of the DON Reasonable Accommodations Tracker, the Department of the Navy is able to discern that the average accommodation requests processed per year is approximately 2,000, resulting in an increase in respondents and annual burden hours than originally estimated. In addition, contract costs and federal labor costs have increased annually due to inflation and general schedule adjustments since the original collection request. The average approximate number of response totals is derived from average total number of responses received number of FY16, FY17 and FY18, entries into the DON Reasonable Accommodation Tracker system.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.