

**Justification for Non-Substantive Changes 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

Justification for Non-Substantive Changes to the Collection

SSA is making the following revisions to Forms SSA-3192, SSA-3193, and SSA-3194:

Revisions to the SSA-3192

- **Change #1:** We are revising the language in the instructions on page 1
 - o **Old Language:** The Social Security Administration (Agency or SSA) offers medical parking as a reasonable accommodation to employees who are "disabled," as defined by section 501 (g) of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 791 (g). Specifically, you must have a physical or mental impairment that substantially limits your mobility or ability to walk to be eligible for the reasonable accommodation of medical parking.

In support of your application for medical parking, your physician must submit Form SSA-3193 Physician's Report and include objective medical documentation supporting the severity of the impairment, such as physician's office notes, x-ray reports, MRI reports, pulmonary function tests, or other medical testing results. Your physician's office should directly forward the physician's report and accompanying documentation via a separate fax/facsimile to the Director, Office of Security Administration and Project Management at (410)-597-0455 or sealed envelope P.O. Box 17789, Baltimore, MD 21235-7789.

Employees with plainly obvious physical impairments do not need to submit the physician's report or medical documentation and should contact the Medical Parking Office directly at (41 O) 966-8814

- o **New Language:** The Social Security Administration (Agency or SSA) offers medical parking as a reasonable accommodation to employees and contractors with disabilities, as defined by section 501(g) of the Rehabilitation Act of 1973, as amended, and 29 U.S.C. 791. To be eligible for the reasonable accommodation of medical parking, you must have a physical, mental, or cognitive impairment that substantially limits your ability to get from your vehicle to your duty station.

In support of your application for medical parking, your physician must submit Form SSA-3193 Physician's Report and include objective medical

documentation supporting the degree of your impairment. Your physician's office should directly submit Form SSA-3193 and accompanying documentation, by a separate fax/facsimile to Director, Office of Security Administration and Project Management at (410)-597-0455 or in a sealed envelope P.O. Box 17789, Baltimore, MD 21235-7789. Your physician's office should avoid sending content that is not relevant to your request for medical parking.

Employees and contractors with plainly obvious physical impairments do not need to submit Form SSA-3193 or medical documentation and should contact the Medical Parking Office directly at (410) 966-8814 or email to Parking.and.Credentialing@ssa.gov.

Justification #1: In response to public comments received from the Equal Employment Opportunity Commission (EEOC), SSA made adjustments to the instructions to be consistent with the requirements of the Rehabilitation Act.

- **Change #2:** We are removing the Subtitle on page 1. "Application and Statement in Connection with Medical Parking at SSA Headquarter Building in Baltimore, MD"

Justification #2: We are removing the subtitle, as it is redundant.

Revisions to the SSA-3193

- **Change #3:** We are updating the language in the instructions:
 - o **Old Language:** SSA offers medical parking as a reasonable accommodation to employees who are "disabled," as defined by section 501 (g) of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 791 (g). Specifically, the employee must have a physical or mental impairment that substantially limits their mobility or ability to walk to be eligible for the reasonable accommodation of medical parking.
You, the physician, must complete this form as support for your patient's application for SSA medical parking. For your patient to be eligible for this accommodation, he/she must have a physical or mental impairment that substantially limits the individual's ability to walk, as substantiated by both two most recent clinical notes from the individual's medical record, as well as by objective medical documentation such as x-ray reports, MRI report, pulmonary function tests, or other medical testing results. Failure to provide the needed information could result in SSA denying your patient's application.
 - o **New Language:** The Social Security Administration (Agency or SSA) offers medical parking as a reasonable accommodation to employees and contractors with disabilities, as defined by section 501(g) of the Rehabilitation Act of 1973, as amended, and 29 U.S.C. 791. To be eligible for the reasonable accommodation of medical parking, you must have a physical,

mental, or cognitive impairment that substantially limits your ability to get from your vehicle to your duty station.

You, the physician, must complete this form as support for your patient's application for SSA medical parking. For your patient to be eligible for this reasonable accommodation, he/she must have a physical, mental, or cognitive impairment that substantially limits his/her ability to get from his/her vehicle to the duty station. The medical documentation must be recent, objective, and clear. The physician may submit a letter describing the patient's condition(s) and symptom(s) relevant to the need for medical parking, but it is not sufficient to provide an unsupported conclusory statement that a patient needs medical parking. Do not submit content that is not relevant to the patient's request for medical parking. Failure to provide the needed information could result in SSA denying your patient's application.

Justification #3: In response to public comments received from the EEOC, SSA made adjustments to the instructions to be consistent with the requirements of the Rehabilitation Act.

- **Change #4:** We are clarifying the language for item #9:
 - **Old Language:** Prognosis and current treatment, including medications, physical therapy, and other active management:
 - **New Language:** Prognosis and current treatment:

Justification #4: In response to public comments received from the EEOC, SSA made adjustments to the item 9 to avoid physicians submitting significant amount of information unrelated to the applicant's application for a reasonable accommodation. SSA is asking the physician to provide "prognosis and current treatment" documentation necessary to establish the applicant needs reserved medical parking.

- **Change #5:** We are updating the contact information for the Medical Parking Office.
 - **Old Language:** If you have any questions, you should contact the Medical Parking Office at(410) 966-8814
 - **New Language;** If you have any questions, you should contact the Medical Parking Office at (410) 966-8814 or email to Parking.and.Credentialing@ssa.gov

Justification #5: We need to provide current contact information.

Revisions to the SSA-3194

- **Change #6:** We are updating the language in the instructions:

- o **Old Language:** The Social Security Administration (Agency or SSA) offers medical parking as a reasonable accommodation to employees who are “disabled,” as defined by section 501(g) of the Rehabilitation Act of 1973, as amended, and 29 U.S.C. 791. Based on your prior application, SSA provided you with a medical parking assignment, which was valid for a one-year period. Before the expiration of your current parking permit, please complete the below certification and return it to the Director, Office of Security Administration and Project Management, by fax to (410) 597-0455 or bring to servicing Parking and Credentialing Office with your expiring permit. If you have any questions, you may contact the Medical Parking Office at (410) 966-8814

- o **New Language:** The Social Security Administration (Agency or SSA) offers medical parking as a reasonable accommodation to employees and contractors with disabilities, as defined by section 501(g) of the Rehabilitation Act of 1973, as amended and 29 U.S.C. 791. Based on your prior application, SSA provided you with a medical parking assignment, which was valid for a one-year period. Before the expiration of your current parking permit, please complete the below certification and return it to the Director, Office of Security Administration and Project Management, by fax to (410) 597-0455 or bring to servicing Parking and Credentialing Office with your expiring permit. If you have any questions, you may contact the Medical Parking Office at (410) 966-8814 or email to Parking.and.Credentialing@ssa.gov.

Justification #6: In response to public comments received from the EEOC, SSA made adjustments to the instructions to be consistent with the requirements of the Rehabilitation Act.

We will implement changes upon OMB approval. These revisions will not affect the current burden information for these forms.

We need to make the revisions immediately instead of waiting for the renewal time to make them because we are making the revisions in response to public comment received from EEOC.