

SUPPORTING STATEMENT

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. Ensures that all contracts for the use of facilities, such as leased buildings and hotels for training programs or conferences, reflect the obligation that such facilities be accessible to all participants including those with disabilities. Only one form, CONFIRMATION OF REQUEST FOR REASONABLE ACCOMMODATION (SD FORM 827), will be used to collect information.

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 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.

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 Business

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

6. Less Frequent Collection

Pursuant to E.O. 13164, EEO MD-715, and 29 U.S.C. § 79, the agency has a requirement to report their efforts towards reasonable accommodation on an annual basis.

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

A 60-Day Federal Register Notice (FRN) for the collection published on Monday, May 20, 2019. The 60-Day FRN citation is 84 FRN 22832.

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

A 30-Day Federal Register Notice (FRN) for the collection published on Wednesday, July 31, 2019. The 30-Day FRN citation is 84 FRN 37265.

9. Gifts or Payment

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

10. Confidentiality

A Privacy Act Statement is located at the end of the end of the SD 827 Form.

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.

The SORN covering this collection of information is DWHS P49, "Reasonable Accommodation Program Records." A copy is attached. A Privacy Impact Assessment is also attached.

The records disposition is under GRS 1, Item 24.

202-43.9 Reasonable Accommodation Request Records 202-43.9.1. General Request Records Agency-wide and departmental procedures for receiving, processing, and appealing requests for reasonable accommodation by employees and applicants. Files may include, but are not limited to: instructions, directives, notices, forms, timetables, guidelines for requesting, processing and approving requests for appealing decisions for reasonable accommodation. Also included are records notifying the Equal Employment Opportunity Commission (EEOC), the agency's

collective bargaining representative(s) and the agency's EEO office of the agency's reasonable accommodation request and processing procedures as well as modifications to established procedures. Disposition: Destroy/Delete 3 years after superseded or when no longer needed for reference, whichever is later. GRS 1, Item 24a

202-43.9.2. Employee Case Files- Individual employee files that are created, received, and maintained by EEO reasonable accommodation or diversity/disability program or employee relations coordinators, immediate supervisors, Computer/Electronic Accommodation Program (CAP) administrator, or HR specialists containing records of requests for reasonable accommodation and/or assistive technology devices and services through the agency or CAP that have been requested for or by an employee. This series also includes, but is not limited to request approvals and denials, notice of procedures for informal dispute resolution or appeal processes, forms, correspondence, e-mails; records of oral conversations, medical documentation, and notes. [Note: These records are neither part of an employee's Official Personnel File (OPF) nor part of a supervisor's unofficial personnel file. Disposition: Destroy/Delete 3 years after employee separation from the agency or all appeals are concluded, whichever is later. GRS, Item 24b

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

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 60 persons per year: Thus resulting in 15 hours per year.

PUBLIC RESPONDENTS (APPLICANTS, CONTRACTORS AND FOREIGN NATIONALS)

Number of Respondents:	20
Frequency of Responses:	1
Total Annual Responses:	20
Burden Per Response:	15 minutes
Total Burden Hours:	5 hours
Estimated hourly rate	\$40.66 (hourly rate of GS 12 step 5)
Average Cost Per Respondent:	\$10.50 (\$40.66 / 4)

Total Respondents Cost: \$203.40

13. Respondent Costs Other than Burden Hour Costs

There are 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.

PUBLIC RESPONDENTS (APPLICANTS, CONTRACTORS AND FOREIGN NATIONALS)

Total Annual Responses:	20
Burden Per Response:	8 hours
Total Burden Hours:	160 hours
Assumed hourly rate of ER specialist	
GS-13 Step 5	\$48.35
Average Cost Per Form:	\$7,736

Total Government Cost: \$7,736

15. Reasons for Change in Burden

There has been no change in burden since the last approval.

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.