

Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
Information Collection Request, 1140-0056
Supporting Statement
Special Agent Medical (Preplacement/Incumbent) - ATF Form 2300.10

A. Justification

1. 5 CFR 339.301 authorizes the creation of a requirement for a routine pre-appointment examination, in order to qualify for a position with specific medical standards. Medical standards are part of the general requirement for specific positions in the Federal government. In general, there must be a direct relationship between the medical standard or physical requirement and the actual duties of the position being filled. Failure to meet an established medical standard or physical requirement, means that the individual is not qualified for the position. Medical requirements are created for positions that involve arduous/hazardous duties or require a high standard of human reliability.

The positions of criminal investigator (special agent), GL/GS-1811, and Explosives Enforcement Officer, GS-1801 were identified having specific medical requirements. The qualification standard for criminal investigator (special agent) is published in the *Qualification Standards Operating Manual*, beginning at page IV-B-229, while the medical requirements for the Explosives Enforcement Officer are included on pages IV-B-231 and IV-B-232. These medical requirements are part of the basic prerequisites for both positions.

Pre-appointment medical information is currently required and collected on two forms, i.e., the United States Civil Service Commission Certification of Medical Examination, Standard Form No. 78, October 1969 (Revision) and the Report of Medical History, Standard Form 93, Rev. June 1996. Both are Office of Personnel Management (OPM) forms. However, these are generic forms that are used for any position, not just for criminal investigators (special agents) or explosives enforcement officers. Therefore, they are not specific to the duties of either position. Additionally, they do not capture information that is essential in the evolution of law enforcement. For example, they do not address the issues of blood lead or the use of respirators. When these forms were developed, many of the environmental factors to which criminal investigators (special agents) and explosives enforcement officers are routinely exposed nowadays, were not considered or perhaps were nonexistent.

The Special Agent Medical Preplacement - ATF Form 2300.10, replaces two existing generic OPM forms, and address the specificity of the duties of the criminal investigator (special agent) or explosives enforcement officer. The form collects specific identifiable data, such as the name, address, telephone, social security number and certain medical data.

ATF requests approval to make the following changes to page six (6) of OMB 1140-0056 (Special Agent Medical (Pre-employment/Incumbent– ATF Form 2300.10):

- Current address: Public Health Service
Division of Federal Occupational Health
Law Enforcement Medical Programs
Attn: ATF Applicant Account Team,
Atlanta Federal Center, Suite 3R10,
100 Alabama Street
Atlanta, GA 30303
- Proposed address: Program Support Center

U.S. Department of Health and Human Services
299 Main Street, Suite 446
Salt Lake City, UT 84111

- The word “Incumbent” was added to the form title.
2. The information on the form must be collected in order to determine whether or not an applicant is actually qualified for the position. The information collected on the form will be used to make a preliminary determination about whether or not an applicant is qualified to serve either as a criminal investigator (special agent) or explosives enforcement officer. The collected data will be also be considered by management officials, when determining whether or not to hire a candidate for either position.
 3. ATF Form 2300.10 is not available on the ATF public website, because the form is specifically used by existing Special Agents and Explosives Enforcement Officers who are applying for similar positions at ATF. These positions have specific medical standards and physical requirements, and the information on the form is used to determine medical suitability for either position. The applicant for either position completes the first half of the form, and the doctor/health care provider completes the second half. When the form is completed, it must be sent by the health care provider via UPS to the Program Support Center, U.S. Department of Health and Human Services, 299 Main Street, Suite 446, Salt Lake City, UT 84111.
 4. ATF uses a uniform subject classification system to identify duplication and to ensure that any similar information already available, cannot be used or modified for use for the purpose of this information collection.
 5. The collection of this information will not impact small businesses or other small entities.
 6. If pre-appointment medical information is not collected, ATF will be unable to determine whether or not an applicant is qualified for the position of criminal investigator (special agent) or explosives enforcement officer at the Bureau.
 7. The pre-appointment medical examination is a one-time examination. There are no special circumstances associated with this information collection.
 8. No comments were received during the 60-day FR notice period. However, a 30-day notice will be published in the Federal Register to solicit public comments.
 9. No payment or gift will be made to any respondent for this information collection.
 10. Medical records are part of a Government-wide Privacy Act system of records. Per 5 CFR 293.504, the composition of and access to the Employee Medical File System sets the assurance of confidentiality. ATF Form 2300.10 is maintained in a secure room. Employees who process the form have a special clearance to access the secure location to perform their duties.
 11. There are specific medical questions that are asked in order to determine medical suitability to qualify for a position that has specific medical standards and physical requirements.
 12. We estimate that 288 agents will be selected for employment. Each agent will respond 1 time. We estimate that it will take the agent 30 minutes to complete his/her portion of the form and medical personnel will take approximately 15 minutes to complete the form, for a total of 45 minutes. Therefore,

the total burden will be 216 hours. The form will be maintained in the Human Resources Operations Division as long as the agent is an ATF employee.

13. The health care provider sends the form by UPS to Salt Lake City, UT at a cost of \$12.50 per form. The total cost associated with this information collection is \$3,600.00.
14. Estimated cost to the Federal government would be approximately \$300.00 for in-house printing of the form.
15. The adjustments associated with this collection include an increase in the both the number of respondents and total burden hours associated with this IC from by 168 and 126 hours respectively. Due to more respondents and an increase in the postal rate, the public cost has also increased by \$ 2,160, since the last renewal in 2017.
16. Results of this information collection will not be published.
17. The Bureau of Alcohol, Tobacco, Firearms and Explosives requests that the expiration date not be printed on the form. The collection of medical information for pre-appointment is an on-going process and. Printing costs will be kept at a minimum if forms are not reprinted every three years to accommodate the expiration date.
18. There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

None