

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

A. Justification

1. Introduction/Authoring Laws and Regulations

As Per Sections 41 CFR 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 plan, 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

The 60-day advance Federal Register Notice published on August 20, 2020 at 85 FR 51540, and we received no public comments. The 30-day FRN published on November 4, 2020 at 85 FR 70216. If we receive any comments in response to this Notice, we will forward them to OMB.

9. Payment or Gifts to Respondents

SSA does not provide payment or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects 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

Please see the burden chart below:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
SSA-3192	390	1	30	195	\$44.07*	\$8,594**
SSA-3193	465	1	90	698	\$44.07*	\$30,761**
SSA-3194	82	1	5	7	\$44.07*	\$308**
Totals	937			900		\$39,663**

* We based this figure on averaging the average of Office Physicians and Executive Branch Management Analysts hourly wages, as reported by Bureau of Labor Statistics data (<https://www.bls.gov/oes/current/oes291123.htm> & <https://www.bls.gov/oes/current/oes131111.htm>).

** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

The total burden for this ICR is **900** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$39,663**. SSA does not charge respondents to complete our applications.

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

13. Annual Cost to the Respondents

This collection does not impose a known cost burden on the respondents.

14. Annual Cost to the Federal Government

The annual cost to the Federal Government is approximately \$26,719. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$1,500
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	0
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$25,219
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$0
Quantifiable IT Costs	Any additional IT costs	\$0
Total		\$26,719

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. It is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

15. Program Changes or Adjustments to the Information Collection Request

There are no changes to the public reporting burden.

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 cycles 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 SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, 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.