

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

OMB Number 1405 - 0068

Medical History and Examination for Foreign Service DS-1843 and DS-1622

A. JUSTIFICATION

1. *Why is this collection necessary and what are the legal statutes that allow this?*

Pursuant to 22 U.S.C. § 4084, the Secretary of State has the authority to establish a Medical Program. This information collection provides to the U.S. Department of State's Office of Medical Services the information needed to determine whether a candidate for a Foreign Service appointment is able to obtain the medical clearance required for that appointment, and to determine the appropriate medical clearances for other individuals who participate in the Medical Program. The information is requested pursuant to the Foreign Service Act of 1980, as amended, in particular 22 U.S.C. §§ 4084, 3901, and 3984. Revisions to the forms are needed to clarify that the information collection is consistent with applicable authorities, including 42 U.S.C. § 2000ff, Title II, and 29 C.F.R. Part 1635.

2. *What business purpose is the information gathered going to be used for?*

The information collected in Form DS-1843/1622 is used to determine if a candidate can obtain the medical clearance that is required for appointment to an overseas position. The information collected in Form DS-1843 and Form DS-1622 is used to provide and to update medical clearances between overseas assignments for individuals who participate in the Medical Program, as well as to provide these individuals with appropriate medical care when assigned abroad.

This information collection is completed by US Government employees, contractors, and their eligible family members. Because the PRA does not apply toward US Government employees completing information as a part of their duties, this OMB Control Number exclusively reflects the burden on individuals covered under the PRA such as contractors and family members.

3. *Is this collection able to be completed electronically (e.g. through a website or application)?*

Presently, the forms are available on the Department of State's public-facing website. The demographic sections are electronically "fillable", but each individual must provide a paper copy to their personal health care provider. Once completed, the forms are scanned and submitted via fax or e-mail. The form is then scanned as an image into the Department's Electronic Health Record (EHR) system. At this time, there is no electronic submission capability that automatically integrates this information collection into the EMR or our Medical Clearances' software applications.

4. *Does this collection duplicate any other collection of information?*

The information is generally not duplicated with other collection instruments, with the exception of basic identification and contact information. The medical information collected can routinely change from one clearance exam to the next, as can addresses, agency, type of employment, status of family members, and other information.

5. *Describe any impacts on small business.*

This collection of information does not impact small businesses or other small entities.

6. *What are the consequences if this collection is not done?*

This information collection is required for the determination of medical clearance classifications for all pre-assignment and pre-employment positions overseas, including for eligible family members. Additionally, the information is needed in order to issue appropriate in-service medical clearances. In most cases, medical clearance updates are required between post assignments or every three years, whichever is shorter, and this frequency allows for the issuance of appropriate medical clearances. Not collecting the required information will result in assignments of contractors and their family members abroad that do not have adequate medical facilities and medical resources to treat their underlying medical conditions.

7. *Are there any special collection circumstances?*

There are no circumstances that would require the information to be collected in the manner described in the instructions for the supporting statement.

8. *Document publication (or intent to publish) a request for public comments in the Federal Register*

The Department published a notice in the Federal Register on May 12, 2020, 85 FR 28134, which solicited comments from the public for a period of 60 days. The Department did not receive any comments during this period.

9. *Are payments or gifts given to the respondents?*

The Department does not make any payment to the respondent.

10. *Describe assurances of privacy/confidentiality*

Medical records and other medical information associated with a particular individual are governed under the Privacy Act of 1974, 5 U.S.C. § 552a. There are no assurances of confidentiality.

11. *Are any questions of a sensitive nature asked?*

These forms require a pre-assignment and pre-employment applicant, and their eligible family members, to provide information regarding chronic medical conditions, mental health status, and past mental health treatment. Although not routinely discussed, except with a person's health care provider, these questions are necessary to gauge the individual and family members' ability to be assigned to hardship posts, or posts where medical resources are scarce. These forms also might include information regarding special educational needs that a dependent child may have.

12. *Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection*

Proposed revisions to the DS-1843/1622 forms would render the DS-6561 form redundant. As a result, the Office of Medical Clearances intends to submit a request to discontinue use of the DS-6561 pending OMB approval of the revised DS-1843/1622.

The Office of Medical Clearances receives approximately 2,039 DS-1843/1622 responses with an estimated 1 hour for respondents to complete the forms. The annual hour time burden for respondents to complete the forms is 2,039 annual hours (2,039 responses x 1 hour).

The average mean hourly wage for civilians across all occupations is \$24.98.¹ The Department multiplied the wage rate by a factor of two to account for the cost of fringe benefits and overhead costs.² The annual cost burden to complete the forms is \$101,868.44 (\$49.96 [cost per response] x 2,039 [annual hours]).

13. *Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.*

There are no costs to respondents.

14. *Describe the cost incurred by the Federal Government to complete this collection.*

The estimated average wage rate for the office is a General Schedule 12, Step 5 in the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA area, which amounts to an hourly base rate of \$45.29.³ The average hourly cost of benefits for federal employees, across all levels of education, is \$28.54 (adjusted from \$26.50 in FY2015 dollars).⁴ The U.S. Department of State's estimated hourly overhead expense is \$16.67 per hour.⁵ The Office of Medical Clearances' total average cost per employee, factoring wage, benefits, and overhead, is \$90.50 per hour.

The cost burden to process a DS-1843/1622 form is \$15.08 (total average hourly cost per employee x [10 / 60]). The annual cost to the federal government to process DS-1843/1622 forms is \$30,748.12 (the cost burden to process the response x total annual responses).

15. *Explain any changes/adjustments to this collection since the previous submission*

¹ Source: (2018) Bureau of Labor Statistics: <https://www.bls.gov/oes/current/999101.htm#00-0000> (federal); https://www.bls.gov/oes/current/oes_nat.htm#00-0000 (civilian)

² Source: (2016) U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis", https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf.

³ Source: (2019) Office of Personnel Management, "Salary Table 2019" - https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB_h.aspx.

⁴ Source: (2017) Congressional Budget Office, "Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015" - <https://www.cbo.gov/publication/52637>. The FY2015 average hourly cost of benefits for federal employees was adjusted using the Bureau of Labor Statistics Consumer Price Index [inflation calculator](#).

⁵ Source: (2016) U.S. Department of Health and Human Services, "Guidelines for Regulatory Impact Analysis", https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, "As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages...." To isolate the overhead rate, the Department subtracted the benefits rate of 63 percent from the recommended rate of 100 percent.

This is a renewal of a previously approved collection. The DS-1843/1622 forms were updated to include questions regarding employment agency information for non-foreign service agencies. Once the collection instruments have been approved, the DS-1843/1622 can be used by respondents employed by both foreign and non-foreign service agencies, rendering the DS-6561 form redundant. As a result, the DS-6561 would be discontinued upon OMB approval of the revised DS-1843/1622 forms.

Additional DS-1843/1622 revisions include correcting typographical errors; formatting the font for clarity; updating the contact information; removing foreign service from the title; removing the urinalysis test; updating the Privacy Act Notice to reflect changes in the organization of the Foreign Affairs Manual; and adding the Genetic Information Nondiscrimination Act statement.

The 2,039 DS-1843/1622 respondents represent approximately a 74% decrease from the previous Paperwork Reduction Act submission.

16. *Specify if the data gathered by this collection will be published.*

The Department will not publish the results of this collection.

17. *If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.*

The Department will display the expiration date for OMB approval of the information collection.

18. *Explain any exceptions to the OMB certification statement below.*

There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods in the collection process nor in the use of the information collected.