# SUPPORTING STATEMENT - PART A

Contractor Personnel and Visitor Certification of Vaccination – OMB Control Number 0704-0613

Summary of Changes from Previously Approved Collection:

- There has been a decrease in burden due to a decrease in respondents
- Title changed from COVID-19 Vaccination Attestation Form
- The form is now only applicable to Federal Contractors and Official Visitors. It is no longer applicable to Federal Civilian employees.

### 1. Need for the Information Collection

Consistent with guidance from the Centers for Disease Control and Prevention (CDC) and the Safer Federal Workforce Task Force established pursuant to Executive Order 13991, "Protecting the Federal Workforce and Requiring Mask-Wearing" (January 20, 2021), the Department of Defense (DoD) is establishing specific safety protocols for individuals fully vaccinated and not fully vaccinated against coronavirus disease 2019 (COVID-19). Individuals who attest they are not fully vaccinated against COVID-19 or who choose not to provide this information will be required to comply with applicable CDC and DoD guidance for individuals not fully vaccinated against COVID-19, which include wearing masks regardless of the transmission rate in a given area, physical distancing, regular screening testing, and adhering to applicable travel requirements.

### 2. Use of the Information

DoD is seeking approval of the collection of information addressed by DD Form 3150 "Contractor Personnel and Visitor Certification of Vaccination". This information is being requested in order to promote the safety of individuals in Federal buildings and on DoD installations, consistent with the COVID-19 Workplace Safety: Agency Model Safety Principles established by the Safer Federal Workforce Task Force, guidance from the CDC and the Occupational Safety and Health Administration, and all applicable government FAQs pertaining to the government's response to COVID 19 --

see<a href="https://www.saferfederalworkforce.gov/faq/contractors/">https://www.saferfederalworkforce.gov/faq/contractors/</a>. This information will be used by DoD staff charged with implementing and enforcing workplace safety protocols and is required for ensuring compliance with the requirement for attestation by all on-site contractors and official visitors. Individuals who refuse to comply with any associated requirements based on the responses to DD Form 3150 may be refused access to the DoD installation or facility to which access is sought.

The information on DD Form 3150 itself will be provided directly by the individuals who are attesting to their vaccination status. DoD contractors performing on-site at DoD installations and facilities with credentialed recurring access will complete and maintain a copy of the DD Form 3150 on their person and show it to authorized DoD personnel, upon request. Official visitors seeking access to DoD installations and facilities will be provided a DD Form 3150 via email or at the entrance to a DoD installation or facility. Official visitors will present their

completed form, when requested, to gain access to a DoD installation or facility and maintain a copy of the form on their person while present at a DoD installation or facility.

DoD began requiring attestations on September 7, 2021. DoD also communicated Department-wide requirements to senior leaders of the military departments and Defense agencies (DoD Components) and directed them to develop supplemental attestation and testing procedures for their components as necessary.

### 3. <u>Use of Information Technology</u>

DoD is using electronic versions of the DD Form 3150 and electronic messaging (e-mail) to communicate the requirements of attestation and completion of the form prior to arrival to a DoD facility, as widely as available. An estimated 90% of responses will be collected electronically.

### 4. <u>Non-duplication</u>

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 Businesses

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

### 6. Less Frequent Collection

It is anticipated that the majority of respondents will only need to complete this form one time. The frequency of completing this form depends upon any changes in a respondent's vaccination status or a respondent's decision to provide this data after electing to refrain from responding. However, respondents may be required present this form on multiple occasions due to requests by DoD personnel or frequent access to DoD installations and facilities. Failure to validate such information may hinder DoD's ability to fully implement COVID-19 workplace safety plans, thereby increasing risk to the health or safety of DoD personnel, DoD-affiliated personnel, and visitors at DoD installations and facilities.

### 7. <u>Paperwork Reduction Act Guidelines</u>

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

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, December 22, 2021. The 60-Day FRN citation is 86 FR 72590 FRN 72590-72591.

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

A 30-Day Federal Register Notice for the collection published on Friday, February 11, 2022. The 30-Day FRN citation is 87 FR 8006 FRN 8006-8007.

### Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

# 9. <u>Gifts or Payment</u>

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

### 10. Confidentiality

The Privacy Act Statement is provided near the top of the form provided to the respondent.

The Systems of Records Notices (SORNs) associated with this data collection for contractor personnel and other DoD-affiliated persons: <u>DPR 39 DoD, DoD Personnel Accountability and Assessment System.</u>

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Forms are not being collected or stored by DoD. The DD Form 3150, will be filled out, carried, and maintained by individuals who fill them out. These individuals must only display the form upon request, not turn them over to DoD.

### 11. Sensitive Questions

The responses collected using this form are necessary to ensure the health and safety of DoD personnel and persons visiting DoD installations and facilities. Collection of additional information regarding vaccine status (e.g., type of vaccine received, dates of vaccinations, or other COVID-19 vaccination-related information) for Contractors and Visitors is not contemplated at this time.

# 12. Respondent Burden and its Labor Costs

### Part A: ESTIMATION OF RESPONDENT BURDEN

#### 1) Collection Instrument(s)

[Contractor Personnel and Visitor Certification of Vaccination]

- a) Number of Respondents: 1,200,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 1,200,000
- d) Response Time: 2 minutes
- e) Respondent Burden Hours: 40,000 hours

#### 2) Total Submission Burden

- a) Total Number of Respondents: 1,200,000
- b) Total Number of Annual Responses: 1,200,000
- c) Total Respondent Burden Hours: 40,000hours

### Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[Contractor Personnel and Visitor Certification of Vaccination]

- a) Number of Total Annual Responses: 1,200,000
- b) Response Time: 2 minutes
- c) Respondent Hourly Wage: \$27.07
- d) Labor Burden per Response: \$0.90
- e) Total Labor Burden: \$1,080,000.00
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 1,200,000
  - b) Total Labor Burden: \$1,080,000.00

The Respondent hourly wage was determined by using the Department of Labor Wage Website ([http://www.dol.gov/dol/topic/wages/index.htm])

### 13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

### 14. Cost to the Federal Government

### Part A: LABOR COST TO THE FEDERAL GOVERNMENT

Collection Instrument(s)

[Contractor Personnel and Visitor Certification of Vaccination]

- a) Number of Total Annual Responses: 1,200,000
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$27.07
- d) Cost to Process Each Response: \$4.51
- e) Total Cost to Process Responses: \$5,412,000.00
- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 1,200,000
  - b) Total Labor Burden: \$5,412,000.00

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

a) Equipment: \$0.00b) Printing: \$150,000

c) Postage: \$0.00

d) Software Purchases: \$0.00

e) Licensing Costs: \$0.00

f) Other: \$0.00

2) Total Operational and Maintenance Cost: \$150,000.00

### Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

Total estimated costs to the DoD include distribution, processing, and printing of DD Form 3150.

- 1) Total Labor Cost to the Federal Government: \$5,412,000.00
- 2) Total Operational and Maintenance Costs: \$150,000.00
- 3) Total Cost to the Federal Government \$5,562,000.00

### 15. Reasons for Change in Burden

The burden has decreased since the previous approval due to a decrease in respondents.

### 16. <u>Publication of Results</u>

The results of this information collection will not be published.

# 17. <u>Non-Display of OMB Expiration Date</u>

DoD is 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"

DoD is not requesting any exemptions to the provisions stated in 5 CFR 1320.9.