



October 29, 2021

William Bestani
Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, D.C. 20530

Subject: Emergency PRA Clearance Request, Medical Exception Request Form

Dear Mr. Bestani:

The Office of the Comptroller of the Currency (OCC) hereby requests approval for a vaccine medical exception form pursuant to the Office of Management and Budget's (OMB) Paperwork Reduction Act (PRA) emergency processing procedures at 5 C.F.R. § 1320.13.

The President, by Executive order 13991 (January 20, 2021) established the Safer Federal Workforce Task Force. The Taskforce was established to give the heads of federal agencies ongoing guidance to keep their employees safe and their agencies operating during the COVID-19 pandemic. The Taskforce issued guidance, in accordance with the President's Executive Order 14043 (September 9, 2021), requiring federal employees to be vaccinated against COVID-19 by November 22, 2021 absent a legally required exception. To determine whether employees who request a medical exception qualify for the exception and a reasonable accommodation, or, alternatively, must comply with the November 22 deadline, the OCC has developed the Request for Medical Exception to the COVID-19 Vaccination Requirement form (Request form).

The Request form was developed, consistent with guidance issued by the Taskforce and the U.S. Department of Treasury's Office of Civil Rights and Diversity, to gather information from employees who have requested medical exceptions and medical professionals treating those employees, to determine whether such employees qualify for legal exceptions to the vaccine requirement. The Request form will also be used to collect information from job applicants who may request a legal exception and reasonable accommodation after receiving an offer of employment from the OCC. Because employees are required to be vaccinated, absent a legal exception by November 22, 2021, (or by their entry-on-duty date for employees hired after November 22), the information to be collected on the Request form is needed prior to the time periods established under the PRA regulations in order to comply with the mandated November 22 vaccination deadline. Compliance with the vaccination mandate is essential to protecting the health and safety of the OCC's workforce, which is essential to the OCC's accomplishment of its mission.

The OCC cannot reasonably comply with the normal clearance procedures because the use of normal clearance procedures will prevent the OCC from obtaining information on the Request form necessary to make exception decisions within the timeframes established by the Taskforce pursuant to Executive Order.

The OCC has determined that: (1) the collection of information within the scope of this request is needed prior to the expiration of time periods established under 5 C.F.R. § 1320.12; (2) this collection of information is essential to the mission of the OCC; and (3) the OCC cannot reasonably comply with the normal clearance procedures because an unanticipated event has occurred and the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information.

This information collection may not be cleared through 5 C.F.R. § 1320.11, which covers only collections of information contained in proposed rules. As noted in 5 C.F.R. § 1320.5(c)(1), the OCC must clear the collection under 5 C.F.R. § 1320.10, which relates to information collections not contained in proposed rules or current rules. There is insufficient time to obtain clearance under 5 C.F.R. § 1320.10 as the collection is needed immediately. Therefore, the OCC is requesting emergency clearance.

Sincerely,

Patrick T. Tierney

Patrick T. Tierney
Assistant Director, Bank Advisory
Office of the Comptroller of the Currency