

## SUPPORTING STATEMENT - PART A

Department of the Navy (DON) Reasonable Accommodations (RA) Tracker –

OMB 0703-0063

### Summary of Changes from Previously Approved Collection

- Contract costs and federal labor costs have increased annually due to inflation and general schedule adjustments since the original collection request

#### 1. Need for the Information Collection

The collected information is used to track, monitor, review and process requests for reasonable accommodations for employees and applicants for employment. The authority to collect this information is granted by the following laws and policy: 5 United States Code (U.S.C.) 301, Departmental Regulations; 5 U.S.C. Chapters 11 (Office of Personnel Management), 13 (Special Authority), 29 (Commissions, Oaths, Records and Reports), 31 (Authority for Employment), 33 (Examination, Selection and Placement), 41 (Training), 43 (Performance Appraisal), 51 (Classification), 53 (Pay Rates and Systems), 55 (Pay Administration), 61 (Hours of Work), 63 (Leave), 72 (Antidiscrimination), 75 (Adverse Actions), 83

(Retirement), 99 (Department of Defense Personnel Authorities); 5 U.S.C. 7201, Antidiscrimination policy, minority recruitment program; 29 USC 791, Employment of individuals with disabilities; 10 U.S.C. 136, Under Secretary for Personnel and Readiness; Executive Order (E.O.) 9830, as amended, Amending the Civil Service Rules and providing for Federal personnel administration; 29 U.S.C. 794, Nondiscrimination under Federal grants and programs; Title 29 Code of Federal Regulations (C.F.R.) 1614.601, Equal Employment Opportunity (EEO) Group Statistics; 29 C.F.R. Section 1630.14, Medical Examinations and Inquiries Specifically Permitted; SECNAV Instruction 12713.14, Equal Employment Opportunity; and E.O. 9397, Relating to Federal Agency Use of Social Security Numbers (SSN), as amended; System of Records Notice (SORN) N12293-1; The Rehabilitation Act of 1973, Sections 501 and 505; 42 U.S.C. 12101, Americans with Disabilities Act of 1990, Titles I and V; and E.O. 13164, Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation.

#### 2. Use of the Information

The collected information is used to support the Department of the Navy's reasonable accommodation process available to civilian employees and applicants for employment. Respondents submit this form to document their request for reasonable accommodations in order to participate in the application process, to perform the essential functions of their position, or to enjoy equal benefits and privileges of employment. The information is used to determine whether the individual has a physical or mental impairment that substantially

limits one or more major life activities, and how the accommodation will enable the individual to participate in the application process, perform the essential functions of the position, or enjoy equal benefits and privileges of employment. This information collection serves as the basis for determining the respondents' entitlement to reasonable accommodation per the Rehabilitation Act of 1974, as amended.

The System of Record, the Navy Electronic Accommodations Tracker (NEAT), serves to electronically document the reasonable accommodation process to ensure timeliness of requests, and to track estimated/actual cost of reasonable accommodations throughout the DON. Practitioners responsible for facilitating the reasonable accommodation process use NEAT to electronically document the events that occurred in connection with the processing of the reasonable accommodation request, and as a repository for the electronic documents produced and obtained in connection with the request, to include the SECNAV 12306/1. In addition, the Command Deputy EEO Officers and the DON Office of Equal Employment Opportunity monitor the information entered into NEAT to oversee compliance with the DON Procedures for Processing Requests for Reasonable Accommodation and applicable federal regulations. Respondents and all other parties do not have access to NEAT. In most cases, respondents are given a "Confirmation of Reasonable Accommodation Request" SECNAV 12306/1 form to fill in and return to the Equal Employment Opportunity (EEO) Office. In other cases, the EEO Office may receive responses to the SECNAV 12306/1 from the respondent verbally or through another written format, and enters the information directly into NEAT.

### 3. Use of Information Technology

Approximately 90 percent of respondents enter their information on to SECNAV 12306/1 and an EEO practitioner enters data into the web-based information system, NEAT. Alternatively, it is estimated that 10 percent of respondents orally provide the information to an EEO practitioner, who documents the oral responses on their behalf.

### 4. Non-duplication

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 does not impose a significant economic impact on a substantial number of small businesses or entities.

### 6. Less Frequent Collection

This information is collected on occasion. If this information were collected less frequently, the Department would be unable to determine the need for reasonable accommodations, type of reasonable accommodations needed, and to track estimated/actual cost of the reasonable accommodation. Additionally, a less frequent collection would result in the

Department violating Federal laws and policies for Equal Employment Opportunities and civil rights.

7. Paperwork Reduction Act Guidelines

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 Monday, November 15, 2021. The 60-Day FRN citation is 86 FRN 63006.

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

A 30-Day Federal Register Notice for the collection published on Monday, January 24, 2022. The 30-Day FRN citation is 87 FR 3515.

Part B: CONSULTATION

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

9. Gifts or Payment

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

10. Confidentiality

A Privacy Act Statement is required and provided at the top of the SECNAV 12306/1 form.

This collection requires a System of Record Notice (SORN). This collection is covered under N12293-1, "Human Resources Civilian Portfolio." N12293-1 is published and available online at <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Article-View/Article/570405/n12293-1/>.

This collection requires a Privacy Impact Assessment (PIA). This collection is covered under the Human Resources Civilian Portal (HRCP) PIA and is published and available online at <http://www.doncio.navy.mil/exports.aspx?id=11102>.

RETENTION AND DISPOSAL: Destroy five years after employee separation from the agency or three years after all administrative or judicial proceedings are concluded, whichever is

later. Destroy five years after an applicant's unsuccessful application for employment with the agency or three years after all administrative or judicial proceedings are concluded, whichever is later.

#### 11. Sensitive Questions

This system of records contains individually identifiable health information. The DoD Health Information Privacy Regulation (DoD 6025.18-R) issued pursuant to the Health Insurance Portability and Accountability Act of 1996, applies to most such health information. DoD 6025.18-R may place additional procedural requirements on the uses and disclosures of such information beyond those found in the Privacy Act of 1974 or mentioned in this system of records notice. Medical information is needed to process reasonable accommodation requests, and therefore must be collected in this system.

#### 12. Respondent Burden and its Labor Costs

##### a. Estimation of Respondent Burden

1. SECNAV 12306/1
  - a. Number of Respondents: 2,000
  - b. Number of Responses Per Respondent: 1
  - c. Number of Total Annual Responses: 2,000
  - d. Response Time: 20 minutes (.33 hours)
  - e. Respondent Burden Hours: 667 hours

##### **2. Total Submission Burden**

- a. Total Number of Respondents: 2,000
- b. Total Number of Annual Responses: 1
- c. Total Respondent Burden Hours: 667 hours

##### b. Labor Cost of Respondent Burden

1. **SECNAV 12306/1**
  - a. Number of Total Annual Responses: 2,000
  - b. Response Time: 20 minutes (.33 hours)
  - c. Respondent Hourly Wage: \$49.83
  - d. Labor Burden per Response: \$16.61
  - e. Total Labor Burden: \$33,220.00

##### **2. Overall Labor Burden**

- a. Total Number of Annual Responses: 2,000
- b. Total Labor Burden: \$33,220

The Respondent hourly wage was determined by using the Department of Labor, Bureau of Labor Statistics website [http://www.bls.gov/oes/current/oes\\_nat.htm#11-0000](http://www.bls.gov/oes/current/oes_nat.htm#11-0000).

ANNUAL LABOR COST:  $667 * \$49.83 = \$33,236.61$  (based on median hourly wage for General and Operational Managers: \$49.83 from the US Labor website)

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

a. Labor Cost to the Federal Government

**1. SECNAV 12306/1**

- a. Number of Total Annual Responses: 2,000
- b. Processing Time per Response: 0.5 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$32.13
- d. Cost to Process Each Response: \$16.07
- e. Total Cost to Process Responses: \$32,130.00

**2. Overall Labor Burden to Federal Government**

- a. Total Number of Annual Responses: 2000
- b. Total Labor Burden: \$32,130.00

b. Operational and Maintenance Costs

- a. Equipment: \$0.00
- b. Printing: \$0.00
- c. Postage: \$0.00
- d. Software Purchases: \$0.00
- e. Licensing Costs: \$0.00
- f. Other: \$17,113.27
  
- g. Total: \$17,113.27

- 1. Total Operational and Maintenance Costs: \$17,113.27
- 2. Total Labor Cost to the Federal Government: \$32,130.00
- 3. Total Cost to the Federal Government: \$49,243.27

15. Reasons for Change in Burden

The Department of the Navy is able to discern that the average practitioner processing requests for reasonable accommodation is a GS-12. Contract costs and federal labor costs

have increased annually due to inflation and general schedule adjustments since the original collection request. In addition, following implementation of the DON Reasonable Accommodations Tracker, the Department of the Navy is able to discern that the average accommodation requests processed per year is approximately 2,000. The average approximate number of response totals is derived from average total number of responses received number of FY18, FY19, and FY20 entries into the DON Reasonable Accommodation Tracker system.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are 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

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.