

SUPPORTING STATEMENT
Environmental Protection Agency
COVID-19 Vaccine Supplemental Medical Provider Statement
OMB Control Number 2030-NEW
EPA ICR Number 2704.01

Abstract

Pursuant to section 3507(j) of the Paperwork Reduction Act (PRA) (44 U.S.C. 3501 et seq.), as implemented in the Office of Management and Budget (OMB) regulations at 5 CFR §1320.13, the Environmental Protection Agency (EPA) is hereby requesting emergency processing of an information collection necessary for collecting information from individuals applying for medical exemption to the COVID-19 Mandatory Vaccinations. Given the critical role of the collection of information to meeting our commitments as outlined in Executive Order (E.O.) 14043 of September 9, 2021, *Requiring Coronavirus Disease 2019 Vaccination for Federal Employees* and the Safer Federal Workforce Task Force guidance, EPA cannot reasonably comply with the normal clearance procedures.

A. Justification

1. Need for collection of information.

Executive Order 14043, *Requiring Coronavirus Disease 2019 Vaccination for Federal Employees* (September 9, 2021), requires all Federal Employees as defined in 5 U.S.C. 2105, to be vaccinated against COVID-19, with exceptions only as required by law. In order to make determinations on requests for medical exceptions to the vaccine mandate, EPA needs to collect information, including medical certification from the employee's medical provider to support their request for accommodation. This information is essential to implement health and safety measures requiring all Federal employees be vaccinated against COVID-19.

2. How, by whom, and for what purpose the information is to be used.

This information is being requested to promote the safety of the Federal workforce, the safety of Federal buildings, and the safety of others on site at agency facilities or those interacting with the public consistent with the COVID-19 Workplace Safety: Agency Model Safety Principles established by the White House Safer Federal Workforce Task Force and guidance from the Centers for Disease Control and Prevention. To support requests for a medical exemption from the COVID-19 vaccination requirement, employees are requested to provide medical information consistent with the medical information in Part 2 of the form (either by having their medical provider fill out the form or separately provide signed certification with the necessary information). The medical provider would provide the form or signed certification to the employee, who would submit the information to the EPA reasonable accommodation office. EPA will use this information to effectively evaluate the employee's request for a medical exemption.

3. Use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

This information collection will request the individual responder to fill out the required fields of the form, obtain medical provider's signature for Part 2, and submit the completed form to the appropriate personnel. A link to this form or a PDF version may be emailed to respondents who will then print it out to complete it or complete it electronically.

4. Efforts to identify duplication.

The EPA is unaware of other sources of similar information available for use by the respondents.

5. Methods to minimize burden on small businesses or other small entities.

The EPA expects that the submission of the information provided places no undue burden on small businesses or other small entities. The information requested has been drafted as narrowly as possible and is not available from any other source.

6. Consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If the collection of the information is not conducted or conducted less frequently, EPA's ability to make determinations on requests for medical exceptions to the vaccine mandate will be impaired and/or delayed.

7. Special circumstances that would cause an information collection to be conducted in a manner inconsistent with 12 CFR part 1320.

There are no special circumstances involved in the collection of this information.

8. Federal Register notice, public comments received, and consultation with the persons outside the Agency.

EPA has requested and a waiver from the requirement to publish a notice in the Federal Register in connection with for the emergency clearance of this information collection request.

EPA will issue a notice in the Federal Register soliciting public comment for 60-days and consult with respondents prior to renewing this emergency clearance.

9. Payment or gift to respondents.

This information collection does not involve a payment or gift to any respondents.

10. Assurance of confidentiality.

The agency provides assurance of confidentiality to respondents concerning the completed Request for a Medical Exception to the COVID-19 Vaccination Requirement.

The Privacy Act Statement is located on the first page of the form.

The authority for this Request for a Reasonable Accommodation to the COVID-19 Vaccination Requirement is derived from Executive Order 14043, Requiring Coronavirus Disease 2019 Vaccination for Federal Employees (Sept. 9, 2021) and Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq. The information in this system is used to decide on requests for accommodation, any subsequent complaints of alleged discrimination, and possibly to evaluate the effectiveness of the EEO program. The collection of this information is authorized by the Equal Employment Opportunity Act of 1972, 42 U.S.C. § 2000e-16, as amended. The Agency will maintain a record of all accommodation requests, including this form, which will be utilized to determine the efficacy and consistency of the reasonable accommodation process. This information may be

disclosed to Agency employees with a need to know, and, per the routine uses found in the system of records notice associated with this collection of information, EPA-73, Reasonable Accommodation Management System (RAMS), 84 FR 32456 (Jul 8, 2019), available at <https://www.regulations.gov/document/EPA-HQ-OEI-2017-0536-0001>. EPA General routine uses A, B, C, F, I, J, K apply.

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

11. Questions of a sensitive nature.

The questions included on this form are consistent with OMB's guidance for requesting a medical exemption.

12. Hour burden of the collection of information.

	Estimated Annual Respondents	Responses per Respondent	Estimated Annual Responses	Estimated Time For Response (hours)	Estimated Burden (hour/year)	Rate (\$/hour)	Estimated Annual Respondent Cost Burden
	(a)	(b)	(a) x (b) = (c)	(d)	(c) x (d) = (e)	(f)	(e) x (f) = (g)
MEDICAL CERTIFICATION REQUEST	175	1	175	1 hours	175	\$103.06	\$18,035.5

EPA uses a rate of \$103.06 per hour for respondent cost burden calculations based on the [U.S. Bureau of Labor Statistics Wage Report](#) rate for family medical physicians.

13. Annual cost burden to respondents or record keepers.

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

14. Annualized costs to the Federal government.

The EPA estimates that the cost of an EEO/Reasonable Accommodation Specialist as a [GS-13, step 6](#) employee is \$75.34 per hour (GS hourly rate of \$57.96 with 30% (\$17.38) added for benefits and overhead).

The EPA estimates that the cost of an Office of General Law Attorney as a [GS-15, step 4](#) employee is \$98.76 per hour (GS hourly rate of \$75.97 with 30% (\$22.79) added for benefits and overhead).

The EPA estimates that the cost of a Deciding Official as a [SES employee](#) is \$103.35 per hour (GS hourly rate of \$79.50 with 30% (\$23.85) added for benefits and overhead).

Burden Hour/Burden Cost to the Federal Government

	Estimated Annual Responses	Estimated Time for Response (hours)	Estimated Burden (hour/year)	Rate (\$/hour)	Estimated Annual Respondent Cost Burden
	(a)	(b)	(a) x (b) = (c)	(d)	(c) x (d) = (e)
COVID-19 Vaccine Supplemental Medical Provider Statement (EEO/Reasonable Accommodation Specialist)	175	1	175	\$75.34	\$13,185

COVID-19 Vaccine Supplemental Medical Provider Statement (Office of General Law/Legal Review)	175	0.5	87.5	\$98.76	\$8,642
COVID-19 Vaccine Supplemental Medical Provider Statement (Deciding Official)	175	0.5	87.5	\$103.35	\$9,043
Total					\$30,870

15. Changes in burden.

There is no change in burden as this is a new information collection.

16. Publication of Results.

EPA will not publish the results of this information collection.

17. Approval to not display the expiration date for OMB approval of the information collection.

The form in this information collection will display the OMB Control Number and the expiration date of OMB approval.

18. Exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

This collection of information does not include any exceptions to the certificate statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.