

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



November 12, 2021

Sharon Block
Acting Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Ms. Block:

Pursuant to Office of Management and Budget (OMB) procedures established at 5 C.F.R. Part 1320, Controlling Paperwork Burdens on the Public, I request that the proposed information collection, the OGE Request for a Medical Exception to the Covid-19 Vaccination Requirement, be processed as an Emergency Clearance Request in accordance with 5 C.F.R. §1320.13, Emergency Processing.

I have determined that this information must be collected prior to the time periods established under Part 1320 of the regulations and that this information is essential to implement OGE's health and safety measures included within recent Centers for Disease Control and Prevention and Safer Federal Workforce Task Force Guidance.¹ OGE has an urgent need to allow employees to make a request for a medical exception to the Covid-19 vaccination requirement. Applying regular Paperwork Reduction Act clearance procedures is likely to cause harm because of the urgent need to protect employee health and safety, without violating employees' legal rights to request medical accommodations. Moreover, it is impracticable for OGE to consult in advance with medical professionals on the public burden this collection will entail.²

Therefore, the Office of Government Ethics (OGE) requests a 180-day emergency clearance to establish the OGE Request for a Medical Exception to the Covid-19 Vaccination Requirement. As this request for approval concerns an urgent safety need, OGE is also seeking OMB's approval to waive the need for the Federal Register Notices otherwise required by 5 C.F.R. 1320.5(a)(1)(iv) and 1320.8(d)(1) prior to publication and implementation of this disclosure. During the 180-day approval, OGE will work to establish a regular Paperwork Reduction Act clearance submission of this information collection request.

¹ See Executive Order 14043: Requiring Coronavirus Disease 2019 Vaccination for Federal Employees (September 9, 2021).

² OGE notes that it is using the template provided by the Safer Federal Workforce Task Force. Thus, the public burden is no more than necessary to meet the requirements set forth in the Task Force's guidance to federal agencies.



We would appreciate if you could please provide an approval/disapproval determination of this request to collect information under an emergency clearance by close of business on Monday, November 22, 2021.

Sincerely,

Dale Christopher
Deputy Director for Compliance