

SUPPORTING STATEMENT - PART A

Request for a Medical Exception to the COVID-19 Vaccination Requirement – OMB Control Number 3440-XXXX

1. Need for the Information Collection

This information must be collected prior to the time periods established under 5 C.F.R. Part 1320 and this information collection is essential to implement health and safety measures requiring all civilian Federal employees be vaccinated as mandated by Executive Order 14043 of September 9, 2021, Requiring Coronavirus Disease 2019 Vaccination for Federal Employees, and included within Safer Federal Workforce Task Force Guidance which mandated all Federal employees be vaccinated by November 22, 2021. The only exception is for individuals who receive a legally required exception approved under established agency processes. ODNI employees may request an exception on the basis of a medical condition or circumstance or a sincerely held religious belief, practice or observance. Exceptions will be granted in limited circumstances and only where legally required.

2. Use of the Information

ODNI is seeking approval of the ODNI form titled, “Request for a Medical Exception to the COVID-19 Vaccination Requirement,” which will be completed by employees who seek a medical exception. ODNI seeks OMB’s approval to process the form as an emergency clearance request in accordance with 5 C.F.R. § 1320.13, Emergency Processing. The ODNI form will be used by ODNI staff and provided to employees to ensure they submit adequate information to support the exception request. This form will also collect information supplied by the requester’s medical provider in order to minimize the need to seek additional information in order to process requests for medical exceptions to the vaccine requirement. Rendered decisions should be in accordance with guidelines established by the Safer Federal Workforce Task Force Guidance.

The ODNI form will be provided directly by the individual who is requesting a medical exception. In establishing exception processes, ODNI will ensure that the individuals designated to make decisions concerning requests for exception from COVID-19 vaccination are at an appropriate level within the organization to consider the impact, if any, of the volume of requests and to ensure that similar cases are handled in a consistent manner.

3. Use of Information Technology

The ODNI form will be given to the medical provider to complete by the individual who is seeking the medical exception. The medical provider will complete the hard copy form and provide it back to the individual seeking the exception.

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

It is anticipated that the respondent will only need to provide this information one time, so there is no way to change the frequency without compromising the results of this collection.

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

Emergency approval was received to waive the public notice requirement under the Paperwork Reduction Act.

Part B: CONSULTATION

Aside from discussions with Office of Management and Budget (OMB) personnel, no additional consultation 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

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 is as follows:

- ODNI-10, "Office of Intelligence Community Equal Employment Opportunity and Diversity Office (IC EEOD) Records, 80 FR 30276 (May 27, 2015) – also available at [<https://www.govinfo.gov/content/pkg/FR-2015-05-27/pdf/2015-12764.pdf>]

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

11. Sensitive Questions

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

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

[ODNI form titled: "Request for a Medical Exception to the COVID-19 Vaccination Requirement"]

- a) Number of Respondents: 100
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 100
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 25 hours

2) Total Submission Burden

- a) Total Number of Respondents: 100
- b) Total Number of Annual Responses: 100
- c) Total Respondent Burden Hours: 25 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[ODNI form titled: "Request for a Medical Exception to the COVID-19 Vaccination Requirement"]

- a) Number of Total Annual Responses: 100
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$27.07
- d) Labor Burden per Response: \$6.76
- e) Total Labor Burden: \$676.00

2) Overall Labor Burden

- a) Total Number of Annual Responses: 100
- b) Total Labor Burden: \$676.00

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

1) Collection Instrument(s)

[ODNI form titled: "Request for a Medical Exception to the COVID-19 Vaccination Requirement"]

- a) Number of Total Annual Responses: 100
- b) Processing Time per Response: 1 hour
- c) Hourly Wage of Worker(s) Processing Responses: \$45.00
- d) Cost to Process Each Response: \$45.00
- e) Total Cost to Process Responses: \$4,500.00

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 100
 - b) Total Labor Burden: \$4,500.00

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0.00
 - b) Printing: \$155.00
 - c) Postage: \$0.00
 - d) Software Purchases: \$0.00
 - e) Licensing Costs: \$0.00
- 2) Total Operational and Maintenance Cost: \$155.00

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

Total estimated costs for the ODNI include labor costs and potential printing of the forms (for those who are not able to access computers).

- 1) Total Labor Cost to the Federal Government: \$4,500.00
- 2) Total Operational and Maintenance Costs: \$155.00
- 3) Total Cost to the Federal Government \$4,655.00

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

ODNI 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"

ODNI is not requesting any exceptions to the provisions stated in 5 CFR § 1320.9.