

Office of the Comptroller of the Currency
Supporting Statement
Request for COVID-19 Vaccine Status and Proof of Vaccination
OMB Control No. 1557-NEW

A. *Justification.*

1. *Circumstances that make the collection necessary:*

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. The Taskforce issued guidance regarding individuals who start their government service after November 22, 2021, stating that those individuals should be fully vaccinated prior to their start date, except in limited circumstances where an accommodation is legally required. The guidance also provided that agencies should require documentation to prove vaccination status of those individuals prior to the enter on-duty date. To determine whether individuals who have been offered a position with the Office of the Comptroller of the Currency (OCC) are fully vaccinated during the onboarding process and before their enter on-duty date, in compliance with the Taskforce guidance, the OCC has developed a form in an online application (Appian vaccination attestation form).

The Request form was developed, consistent with guidance issued by the Taskforce and the U.S. Department of Treasury, to gather information from employees regarding their vaccination status and proof of vaccination. The Appian vaccination attestation form will also be used to collect information from prospective employees. In order to comply with the Taskforce guidance, the information to be collected on the Appian vaccination attestation form is needed prior to the time periods established under 5 CFR part 1320. Compliance with the vaccination mandate and the Taskforce guidance 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 onboarding new employees and, at the same time, obtaining information on the Appian vaccination attestation form that is needed to comply with the timeframes Taskforce's guidance issued pursuant to Executive Order.

2. *Use of the information:*

The OCC will use the information on the form to determine whether employees or prospective employees are in compliance with the vaccination mandate.

3. *Consideration of the use of improved information technology:*

The form is completed and submitted electronically.

4. *Efforts to identify duplication:*

There is no duplication.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Not applicable.

6. Consequences to the federal program if the collection were conducted less frequently:

Not applicable.

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

Not applicable.

8. Efforts to consult with persons outside the agency:

The OCC will issue a notice for 60 days of comment regarding this collection to renew it.

9. Payment or gift to respondents:

None.

10. Any assurance of confidentiality:

The information is subject to the protections of the Privacy Act of 1974; is covered by system of record notice Treasury .020, Department of the Treasury - Health Screening and Contact Tracing Records, available at 86 FR 11381 (Feb. 24, 2021).; and, the Rehabilitation Act, and it will be kept private to the extent permitted by law.

11. Justification for questions of a sensitive nature:

Pursuant to the Executive Order and the Taskforce guidance, and consistent with the Rehabilitation Act and EEOC regulations, the OCC is authorized to and must ask questions regarding vaccination status and require proof of vaccination to determine whether employees and prospective employees are in compliance with the vaccination mandate.

12. Burden estimate:

Estimated Number of Respondents: 250.

Estimated Burden per Respondent: 0.25 Hours.

Total Burden: 62.5 Hours.

$62.5 \times \$114.17 = \$ 7,135.63$

To estimate wages, the OCC reviewed May 2020 data for wages (by industry and occupation) from the U.S. Bureau of Labor Statistics (BLS) for credit intermediation and related activities (NAICS 5220A1). To estimate compensation costs associated with the rule, the OCC uses \$114.17 per hour, which is based on the average of the 90th percentile for six occupations adjusted for inflation (2 percent as of Q1 2021), plus an additional 33.4 percent for benefits (based on the percent of total compensation allocated to benefits as of Q4 2020 for NAICS 522: credit intermediation and related activities).

13. Estimate of total annual cost to respondents (excluding cost of hour burden in Item #12):

Not applicable.

14. Estimates of annualized costs to the federal government:

Not applicable.

15. Change in burden:

None. This is a new collection.

16. Information regarding collections whose results are to be published for statistical use:

Not applicable.

17. Reasons for not displaying OMB expiration date:

Not applicable.

18. Exceptions to the certification statement:

Not applicable.

B. Collections of Information Employing Statistical Methods.

Not applicable.