



December 14, 2021

William Bestani
Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, D.C. 20530

Subject: Emergency PRA Clearance Request, Vaccination Attestation Form

Dear Mr. Bestani:

The Office of the Comptroller of the Currency (OCC) hereby requests approval for a vaccine medical exception form pursuant to the Office of Management and Budget's (OMB) Paperwork Reduction Act (PRA) emergency processing procedures at 5 C.F.R. § 1320.13.

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 C.F.R. 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.

The OCC has determined that: (1) the collection of information within the scope of this request is needed prior to the expiration of time periods established under 5 C.F.R. § 1320.12; (2) this collection of information is essential to the mission of the OCC; and (3) the OCC cannot reasonably comply with the normal clearance procedures because an unanticipated event has occurred and the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information.

This information collection may not be cleared through 5 C.F.R. § 1320.11, which covers only collections of information contained in proposed rules. As noted in 5 C.F.R. § 1320.5(c)(1), the OCC must clear the collection under 5 C.F.R. § 1320.10, which relates to information collections not contained in proposed rules or current rules. There is insufficient time to obtain clearance under 5 C.F.R. § 1320.10 as the collection is needed immediately. Therefore, the OCC is requesting emergency clearance.

Sincerely,

Patrick T. Tierney

Patrick T. Tierney

Assistant Director, Bank Advisory

Office of the Comptroller of the Currency