SUPPORTING STATEMENT FOR CERTIFICATION OF VACCINATION OMB CONTROL NO. TBD

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Consumer Financial Protection Bureau (CFPB or the Bureau) is establishing safety protocols for both fully vaccinated and unvaccinated people. This information collection (e.g. the certification form) will ascertain individuals' vaccination status in order for the Bureau to comply with Executive Order 13991[1] titled *Protecting the Federal Workforce and Requiring Mask-Wearing*.

In compliance with guidance from the Centers for Disease Control and Prevention (CDC) and the Safer Federal Workforce Task Force, the Bureau is collecting this information from fully vaccinated individuals so that they can comply with Bureau safety guidelines. The Bureau is also collecting this information from partially or unvaccinated individuals so that that other measures can be implemented to enforce Bureau safety guidelines (e.g. wearing masks, physical/social distancing, regular testing, adherence to applicable travel requirements).

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The Bureau requests these data to promote the safety of Federal buildings, the Federal workforce, and others on site at agency facilities consistent with the COVID-19 Workplace Safety: Agency Model Safety Principles established by the Safer Federal Workforce Task Force and guidance from the Centers for Disease Control and Prevention and the Occupational Safety and Health Administration. Specifically, Bureau staff will use these data for implementing and enforcing workplace safety protocols.

The Bureau is permitting visitors to provide any of the following forms of proof of vaccination:

- A copy of the immunization record from a health care provider;
- A copy of the COVID-19 Vaccination Record Card;
- A copy of medical records documenting the vaccination;

[1] Published in the Federal Register on 1/21/2021: https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01766.pdf

- A copy of immunization records from a public health or state immunization information system;
- A copy of any other official documentation containing required data points (e.g. type of vaccine administered, date(s) of administration, the name of the health care professional(s) or clinic site(s) administering the vaccine(s)).

All of these requirements are in accordance with guidelines of the Safer Federal Workforce Task Force.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The form can be printed out, completed, and presented to Bureau security personnel at the entrance of Bureau headquarters. Respondents may also complete the form in PDF format, save it to their electronic device, and show agency personnel at the entrance of Bureau headquarters.

Respondents may also provide digital copies of vaccination proof (e.g. digital photograph, scanned image, or PDF) as long as the record clearly and legibly displays the information outlined above.

In any case, Bureau staff will continue researching options on further reducing burden and/or implementing IT resources to a greater extent.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

An information collection that collects data sufficient to satisfy the Bureau's safety protocols does not exist.

There is no other existing information collection that covers this category of respondent.

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

Not applicable. The information collected will be supplied by individuals. Small businesses or other small entities are not impacted by this collection of information.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

As discussed above, failing to collect this information may leave the Bureau without the necessary information to properly impose science-based public health measures and to adequately protect federal staff, federal contractors, and visitors while physically present in the Bureau's headquarters.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentially that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentially to the extent permitted by law.**

Respondents may be required to complete this form more often than quarterly if there are changes in their vaccination status, if there is a need to update their pertinent information on the form, or if they routinely seek entry into Bureau headquarters.

No other special circumstances apply to this information collection.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and

recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Per requirements in 44 USC 3506(c)(2)(a), the Bureau published a 60-day notice within the Federal Register[2]. No comments were received.

Per requirements in 44 USC 3507(b), the Bureau also published a 30-day notice within the Federal Register[3]. That notice directed respondents to submit comments directly to the OMB desk officer per normative procedure.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

Not applicable. This information collection does not provide payments of gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The information collected on this form is covered by the system of records notice, CFPB.029, Public Health and Safety System, 86 FR 18041 (4/7/2021).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection includes a request for information concerning whether an individual has received the COVID-19 vaccination. To the extent this information is deemed sensitive by respondents, it is necessary to promote the safety of Federal buildings, and the Federal workforce, and others on site at agency facilities consistent with the COVID-19 Workplace Safety: Agency Model Safety Principles established by the Safer Federal Workforce Task Force, and guidance from the Centers for Disease Control and Prevention and the Occupational Safety and Health Administration.

[2] 86 FR 63344 (11/16/2021).
[3]

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The Bureau estimates the burden of this information collection as follows:

Information Collection Requirement	Number of Respondent	Number of Responses per Respondent	Total Responses	Average Burden Hours	Annual Burden Hours	Wage Rate	Total Burden Cost
Certification of Vaccination	1,500	1	1,500	0.0083[4]	125	$27.07[5]	$3,384

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no non-wage costs to respondents or recordkeepers resulting from this information collection.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

[4] 0.0083 hours = ~5 minutes.
[5] Mean hourly wage for all occupations as listed on the Bureau of Labor Statistics website: https://www.bls.gov/oes/current/oes_nat.htm#00-0000.

The Bureau does not incur any additional Federal annualized cost as a result of this information collection.

15. Explain the reasons for any program changes or adjustments.

The Bureau is not making program changes or adjustments to this information collection.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The Bureau will not publish the collected information.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Bureau is not seeking to avoid displaying the expiration date. The expiration date will be displayed in the upper right-hand corner of the proposed form.

18. Explain each exception to the certification statement.

The Bureau certifies that this collection of information is consistent with the requirements contained within 5 CFR Sections 1320.9 and 1320.8(b)(3) and is not seeking an exemption to these certification requirements.