

Selective Service System

SUPPORTING STATEMENT

Selective Service System FORM 750

“Reasonable Accommodation and Medical Exception Health Records”

Description of the Information Collection

Executive Order (EO) 14043, titled, “Requiring Coronavirus Disease 2019 Vaccination for Federal Employees,” requires all Federal employees, as defined in 5 U.S.C. § 2105, to be vaccinated against COVID-19, with exceptions only as required by law. Requests for “medical accommodation” or “medical exceptions” will be treated as requests for a disability accommodation and evaluated and decided under applicable Rehabilitation Act standards for reasonable accommodation absent undue hardship to the agency. An employee may also request a delay for complying with the vaccination requirement based on certain medical considerations that may not justify an exception under the Rehabilitation Act. The agency will be required to keep confidential any medical information provided, subject to the applicable Rehabilitation Act standards. Employees who receive an exception or a delay from the vaccination requirement would instead comply with alternative health and safety protocols.

The Selective Service System (SSS) is requesting emergency review of SSS Form 750, which will be used to collect information from employees seeking a medical exception from the COVID-19 vaccination requirement. The information is needed before the expiration of the normal time limits under the Office of Management and Budget’s regulations at 5 CFR 1320 that implement the provisions of the Paperwork Reduction Act of 1995. Because of the nature of the public health emergency and the urgent need for the agency to meet the required deadline that all Federal employees be vaccinated except those approved for an exception as required by law, the SSS cannot reasonably comply with the normal clearance procedures because of a need for a swift response to allow for the collection of this information by November 22, 2021.

1. Explain the circumstances that make the collection of information necessary.

Consistent with Executive Order 14043, of September 9, 2021, “Requiring Coronavirus Disease 2019 Vaccination for Federal Employees” and included within the Safer Federal Workforce Task Force Guidance mandating all Federal employees be vaccinated by November 22, 2021, the SSS has established specific safety protocols for individuals fully vaccinated and not fully vaccinated against coronavirus disease 2019 (COVID-19). Individuals who are not fully vaccinated against COVID-19 by November 22, 2021, or who choose not to provide this information will be required to comply with applicable OMB, OPM, and SSS guidance for individuals not fully vaccinated against COVID-19, which may include wearing masks regardless of the transmission rate in a given area, physical distancing, regular screening testing, and adhering to applicable travel requirements.

SSS employees may request an exception on the basis of a medical condition or circumstance. Exceptions will be granted in limited circumstances and only where legally required.

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

The SSS is seeking approval of SSS Form 750, "Reasonable Accommodation and Medical Exception Health Records" which will be completed by employees who seek a medical exception and their personal medical providers. The SSS Form 750 will be used by SSS staff and provided to employees to ensure they submit adequate information to support the exception request. This form will also ensure the information collected is consistent and minimizes the need to seek additional evidence. Rendered decisions should be in accordance with guidelines established by the Safer Federal Workforce Task Force Guidance.

The SSS will use the information submitted for the sole purpose of determining if a medical exception is legally warranted.

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.

All records in this System of Records are maintained and in compliance with applicable executive orders, statutes, and agency implementing recommendations. Electronic records are stored in databases and/or on hard disks, removable storage devices, or other electronic media. Paper records are maintained in a secure, access controlled room, with access limited to authorized personnel.

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 2 above.

The SSS is not aware of any duplication of requirements.

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

This information collection request has no identified impact on small businesses and organizations.

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

It would inhibit the ability of SSS to meet the mandates of the Safer Federal Workforce Task Force and COVID-19 workplace safety protocols.

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

N/A

8. If applicable, provide a copy and identify the date and page 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.

N/A. Emergency approval was received by OMB to waive the Federal Register Notice with regard to this information collection request for emergency clearance.

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

N/A

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

The Privacy Act Statement is provided on the form. The Systems of Records Notices (SORNs) associated with this data collection is for Selective Service System's Reasonable Accommodation, Religious Exception, and Medical Exception Health Records.

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.

The questions included on this form are consistent with OMB's guidance for requesting a medical exception to the COVID-19 vaccination requirement.

12. Provide estimate of the hour burden of the collection of information.

The SSS estimates that annually less than 8 requests will be received and that the burden to complete the form will be 0.5 hours per request. The estimated total annual burden will approximately 4 hours (8 requests x 0.5 hrs/request).

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information.

There are no additional costs.

14. Provide estimates of annualized costs to the Federal Government.

The SSS estimates that it will take 2 hours per form for SSS staff to review and process each request. For 8 forms, this will require 16 hours of SSS staff time (16 forms x 2 hours per form) at an estimated cost of \$872 (16 hours x \$54.50/hour).

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

This is a new information collection. The SSS staff anticipates receiving less than 10 requests for medical exceptions via the SSS Form 750, "Reasonable Accommodation and Medical Exception Health Records" resulting in 5 hours of burden to respondents.

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

N/A

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

N/A. Selective Service is not seeking approval.

18. Explain each exception to the topic certification statement identified in Certification for Paperwork Reduction Act Submission.

There are no exceptions to the certification statement.

19. Federal Register notice required for soliciting public comments on this collection of information was published on:

N/A