

Supporting Statement for Paperwork Reduction Act Submissions
OMB Form 3048-XXXX
Request for a Medical Exception to the COVID-19 Vaccination Requirement Form

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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 Export Import Bank of the United States (EXIM) are authorized to collect the information requested on this form pursuant to 29 U.S.C. § 1302; 44 U.S.C. § 3101; 5 U.S.C. § 301; 29 U.S.C. § 701 et seq.; 29 U.S.C. §791; 42 U.S.C. § 12101 et seq.; 42 U.S.C. § 2000e et seq.; 42 U.S.C. § 2000bb; 42 U.S.C. Ch. 21, 126; 29 CFR Parts 1605, 1614, 1630; Executive Order 13164 (July 26, 2000); and Executive Order 13548 (July 26, 2010).

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.

While the information requested on this form is intended to be used primarily for internal purposes, in certain circumstances it may be necessary to disclose this information externally, for example to disclose information to: physicians or other medical professionals or religious or spiritual advisors or institutions to provide them with or obtain from them the necessary documentation and/or certification for reasonable accommodation; another Federal agency or commission with responsibility for labor or employment relations or other issues, including equal employment opportunity and reasonable accommodation issues, when that agency or commission has jurisdiction over reasonable accommodation issues; the Office of Management and Budget (OMB), Department of Labor (DOL), Office of Personnel Management (OPM), Equal Employment Opportunity Commission (EEOC), or Office of Special Counsel (OSC) to obtain advice regarding statutory,

regulatory, policy, and other requirements related to reasonable accommodation; appropriate third-parties contracted by the Agency to facilitate mediation or other dispute resolution procedures or programs; or to a Federal agency or entity authorized to procure assistive technologies and services in response to a request for reasonable accommodation.

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 submissions 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 majority of these forms are received electronically, together with electronic attachments of supporting medical documentation. EXIM processing is fully electronic and concludes with the issuance of a document sent electronically to the individual or the individual making the request.

4. Describe effort 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.

All requests are independent of each other; therefore, there is no duplication since each request corresponds to a single individual.

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

There is no impact to small businesses as the forms are submitted by individuals.

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.

The collection of this information is essential to the review of the individual request for reasonable accommodation, which can potentially delay the approval/disapproval process.

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;

*in connection with a statistical survey, that is not designed to produce valid or 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 confidentiality 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 secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This collection is consistent with guidelines in 5 CRF 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice 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.

The 60 Days and 30 Days Federal Register Notices will be submitted to the Federal Register as soon as possible.

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

EXIM does not provide any payments or gifts to respondents.

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

EXIM and its officers and employees are required to keep this information confidential pursuant to the authorities listed in the response to question 1. The information will be released only to those EXIM officers and employees who have responsibility to advise on and decide if an individual is entitled to a reasonable accommodation.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered provides. This justification should include the reasons why the agency considered 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.

The information requested includes medical information. The medical

information requested is necessary to determine if an individual is entitled to a reasonable accommodation. The individual submits the information voluntarily, and EXIM informs the individual the information will be used only for the purpose of deciding if the individual is entitled to a reasonable accommodation.

12. Provide estimates of the hour burden of the collection of information. The statement should include
- *the number of respondents: 12
 - *the frequency of response: Annually
 - *annual hour burden: and 2 hours per request
 - *an explanation of how the burden was estimated.

EXIM calculated the burden based on past reasonable accommodation requests.

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

There is no monetary burden to respondents other than the hour burden estimated in (12).

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

Reviewing time per response:	2 hours
Responses per year:	12
Reviewing time per year:	24 hours
Average Wages per hour:	\$42.5
Average cost per year:	\$1020.00
Benefits and overhead:	20%
Total Government Cost:	\$1224.00

15. Explain the reasons for any program changes or adjustments reflected in the public burden or government costs.

There are no program changes or adjustments.

16. For 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, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

No publication or tabulation of collected information is intended. No complex analytical techniques will be applied.

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.

EXIM is not seeking approval to not display the expiration date.

18. Explain each exception to the certification statement identified in item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.

There are no exceptions to the certification statement.

Part B. - Collection of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on OMB Form 83-1 is checked, “Yes” the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

Statistical methods are not used in this information collection.