

**Office of the Comptroller of the Currency**  
**Supporting Statement**  
**Request for COVID-19 Vaccine Status and Proof of Vaccination**  
**OMB Control No. 1557-0355**

**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 (Task Force). The Task Force 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 Task Force 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 Task Force 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 Task Force guidance, the OCC developed the Appian vaccine attestation form in an online application (Attestation Form). The Attestation Form was developed, consistent with guidance issued by the Task Force and the U.S. Department of Treasury, to gather information from current and prospective employees regarding their vaccination status and proof of vaccination.

To ensure compliance with an applicable preliminary nationwide injunction, which may be supplemented, modified, or vacated, depending on the course of ongoing litigation, Office of the Comptroller of the Currency will take no action to implement or enforce the COVID-19 vaccination requirement pursuant to Executive Order 14043 on Requiring Coronavirus Disease 2019 Vaccination for Federal Employees while the injunction is in effect.

**2. *Use of the information:***

The OCC uses 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 issued a notice for 60 days of comment regarding this collection on March 8, 2022, 87 FR 13042. No comments were received.

**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 Executive Order 14043 and the Task Force 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.

**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.