

**USDA, Forest Service**  
**Paperwork Reduction Act (PRA)/Information Collection Request (ICR)**  
**Justification for a Nonmaterial/Non-substantive Change Request** Formally OMB 83c

OMB Control 0596-0164: Fire and Aviation Management Medical Qualifications Program

The USDA Forest Service is requesting a nonmaterial/non-substantive change for information collection OMB 0596-0164: Fire and Aviation Management Medical Qualifications Program. This request is for approval of a nonmaterial/non-substantive change to remove four questions from the Health Screening Questionnaire form (FS-5100-0031) to be more consistent with the intent of Forest Service policy FSH 6509.14 in the implementation of 5 CFR Part 339 Medical Qualifications Determinations. Removing the questions would not change the scope of the form.

Pursuant to 5 CFR Part 339 Medical Qualifications Determinations, the agency can require an examination only for a position with specific medical standards and/or physical requirements, or that is covered by a medical evaluation program (§ 339.301(a)). The Office of Personnel Management established the Federal Interagency Wildland Firefighter Medical Standards for Arduous Duty Wildland Firefighters in 2000, with minor revisions in 2014. The Health Screening Questionnaire form is used for positions that have specific medical standards (i.e., arduous duty wildland firefighter) as well as for positions and qualifications categorized as moderate and light duty prior to being allowed to take the work capacity test.

Four questions were added to the Health Screening Questionnaire (FS-5100-0031) as part of the renewal of OMB 0596-0164 in 2023:

- I have/carry/take prescribed medications (other than birth control, testosterone), take herbal supplements, or take over-the-counter medication regularly
- I have an allergy that I have been told I should carry an Epi-pen for
- I wear corrective lenses
- I have been told I have hearing loss or I wear hearing aids

Upon implementation of the new Health Screening Questionnaire form in late 2023 and 2024, the agency recognized that while the broadness of the questions aligned with the Federal Interagency Wildland Firefighter Medical Standards for arduous duty positions, they were too broad for the moderate and light levels and were resulting in a significant increase in follow-up exams for relatively minor issues. Due to the form being the sole mechanism for screening arduous, moderate and light duty positions and wildland fire qualifications, the addition of the four questions created a higher level of medical clearance for non-arduous positions. This increase in exams resulted in delays in routine clearances for all positions, which impacted workforce availability for emergency response.

While the agency evaluates a more robust exam and process specifically for arduous duty employees, removing the four questions from the Health Screening Questionnaire form that is part of OMB 0596-0164 would more closely align the intent and scope of the form with the medical clearance process and associated authorities for all three position and wildland fire qualification levels (arduous, moderate and light). As the changes are to remove questions only, there is no modification or change to the burden on the parties from whom the information is being collected.