SUPPORTING STATEMENT A FOR
Voluntary Wellness Program Healthcare Provider Clearance Form
DEA Form 315c
OMB Approval Number XXXX

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 collection of information via the DEA-315c form is necessary to determine whether DEA employees are medically cleared to safely participate in physical fitness activities under the Voluntary Wellness Program (VWP). This requirement is both a matter of workplace safety and an essential component of the agency's broader health and wellness initiatives.

Pursuant to DEA Personnel Manual 2792, employees must submit a health assessment completed by a licensed medical professional prior to engaging in VWP activities. This process ensures that participation is medically appropriate based on the individual's current health status and minimizes the risk of injury or exacerbation of existing conditions.

The requirement to collect this information is further supported by administrative directives that promote employee well-being and support the safe implementation of agency-sponsored wellness programs. A copy of the relevant section of DEA Personnel Manual 2792 is attached in accordance with the request.

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 information is collected by the DEA Work Life Administrator and is used to confirm that employees have been medically cleared to participate in Voluntary Wellness Program activities. Employees are responsible for obtaining medical clearance from a licensed physician, who must complete the required health assessment form. Once completed, the form is submitted electronically to the DEA Work Life Administrator for review. This process ensures that participation in the program does not pose a health risk to the employee and that all activities align with the individual's current medical condition. Additionally, the information serves to establish program eligibility and supports appropriate documentation for liability coverage.

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 information is collected by the DEA Work Life Administrator and is used to confirm that employees have been medically cleared to participate in voluntary physical wellness activities. As part of the current process, the employee obtains medical clearance from a licensed healthcare provider using the required DEA Form 315c. In some cases, healthcare providers may allow the employee to submit the form electronically and may also return the completed form electronically to the employee. However, the healthcare provider does not submit the form directly to the DEA. The completed clearance form is returned to the employee, who then submits it electronically to the DEA Work Life Administrator as part of a larger documentation package required for program participation.

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.

There is no duplication of information. The DEA Form 315c captures a unique medical clearance that is specific to an employee's eligibility to participate in the Voluntary Wellness Program. This information is not collected or maintained elsewhere in DEA personnel files or occupational health records, as it pertains solely to voluntary fitness activities and is based on an individualized assessment by a licensed healthcare provider. No existing forms or systems within the agency collect the same data for this specific purpose, and therefore, the use or modification of other records is not applicable.

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

There is no impact on small business.

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.

Without the DEA Form 315c, the DEA would be unable to verify participants' medical suitability for the VWP. This poses safety risks to employees, potential liability to the agency, and could jeopardize program integrity.

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.**

There are no special circumstances.

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.

The 60-day notice was posted in the OFR on August 4, 2025, 90 FR 36453 and open for public comment until October 4, 2025, No comments were received. The 30-day notice was posted on November 24, 2025, with the comment period ending on December 24, 2025.

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.

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

There are no gifts or payments made to the respondents by the DEA. The employee is required to pay whatever fee the medical provider charges for this service.

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

The form does not request medical diagnosis or sensitive medical history, only a clearance decision. Completed forms are distributed only to internal staff: the Work Life Administrator and the employee. Records are managed in accordance with DOJ privacy and records policies. As set forth in the Form's Privacy Act Notice, use and disclosure of information contained therein will be strictly controlled and will be confined to those who have a need for the information in conjunction with DEA responsibilities.

Confidentiality of Survey Data

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.

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.**

  This request pertains to one DEA Form 315c no separate breakdown is needed.

- **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.**
    - Wage Category: Healthcare providers (physicians, nurse practitioners, physician assistants)
    - Estimated Hourly Wage: $85/hour
    - Total Respondent Cost: 75 \text{hours} × \$85 = \$6,375
        - Note: The respondent does not bear the burden of the cost as the DEA employee either pays privately or uses health insurance.

Estimated Annualized Respondent Cost and Hour Burden

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)
DEA Form 315c	100	1 x per year	100	45 minutes	75 hours

    - Estimated Number of Respondents: 300 healthcare providers
    - Frequency of Response: Once every three years per respondent
    - Average Annual Responses: 100 (300 ÷ 3)
    - Estimated Time per Response: 45 minutes (0.75 hours)
        - This estimate includes time for reviewing medical records, conducting a brief evaluation (if needed), completing the form, and noting any restrictions or medical considerations. Total Annual Hour Burden: 100 \text{responses} × 0.75 \text{hours} = 75 \text{hours}
    - **Range of Burden Variation:**
        - Low end: 30 minutes (0.5 hours) for simple clearances
        - High end: 60 minutes (1.0 hour) for cases requiring clinical documentation or complex conditions
    - **Explanation of Variance:**
        - Time depends on the complexity of the employee's medical profile and whether restrictions or additional guidance are required.

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

- **The cost estimate should be split into two components: (a) a total capital and start up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of**

methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

Total Capital and Start Up Cost to Respondents: Zero. Respondents can use existing software and Internet connections or, if that is unavailable, can fill out paper forms. Services provided by the respondents are paid by the DEA employee via health insurance or private pay.

Total operation and maintenance and purchase of services requirement: Zero. DEA can use existing software and Internet connections.

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.

Cost of printing and maintaining form: Zero as this process is electronic

Cost of personnel and support staff or other expenses that would not have been incurred without collection of information: Zero

Therefore, the estimated annual cost to Federal government is zero.

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

There are no program changes or adjustments to report.

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.

There are no plans to publish the information collected.

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.

DEA will display the expiration date on this collection.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATON EMPLOYING STATISTICAL METHODS.