

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
OMB Number 1405-0224**

A. JUSTIFICATION

1. Why is this collection necessary and what are the legal statutes that allow this?

The DS-6570 (Employee Self-Certification and Ability to Perform in Emergencies (ESCAPE) Posts, Pre-Deployment Physical Exam Acknowledgement Form) is used to identify individuals with health concerns that may be a hazard to themselves or their colleagues while deployed at high threat Diplomatic Missions. This form is required by 16 STATE 62384, paragraph 3, which implements the Foreign Service Act of 1980 (22 U.S.C. 4084).

2. What business purpose is the information gathered going to be used for?

The DS-6570 is completed by an individual and their medical provider to identify if that individual has health concerns that may represent a safety hazard for the individual or others at an ESCAPE post. Employee Self-Certification and Ability to Perform in Emergencies (ESCAPE) posts are diplomatic missions overseas that are in extremely high threat areas with the potential for combat. Current ESCAPE missions are, Iraq, Juba, Kyiv, Libya, Peshawar, Somalia, Syria, and Yemen. The questions on the form identify health risks that might predict an emergency medical situation for that patient or indicate that an individual may not be able to self-evacuate in the event of conflict.

3. Is this collection able to be completed electronically (e.g. through a website or application)?

Presently, the forms are available on the Department of State public internet site as a PDF form, but will provide an electronic format that will utilize the ServiceNow platform. The demographic sections are electronically “fillable”, but each individual must provide a paper copy to his or her personal health care provider, and once completed, the forms are scanned and submitted via facsimile or e-mail. The form is then scanned as an image into the DOS Electronic Medical Record (EMR).

4. Does this collection duplicate any other collection of information?

It does not duplicate any previously collected information. The information gathered is specific to a very small group of people deploying as civilians to conflict areas under the auspices of the U.S. Government. The questions asked are not typically asked on routine medical exams.

5. Describe any impacts on small business.

This collection of information does not impact small businesses or other small entities.

6. What are consequences if this collection is not done?

The DS-6570 is designed to promote the safety of individuals and their colleagues posted to Diplomatic Missions in very high threat posts. These evacuations require special air flights

out of a conflict zone, risking the lives of those required for the transport and potentially delaying life-saving care for the individual. MED Clearances may limit the deployment of an individual that self-identifies a health concern using this form.

7. Are there any special collection circumstances?

There are no special collection circumstances. The distribution of this form is limited to the individuals who may be deployed to ESCAPE posts who also have access to the Department of State Medical Program.

8. Document publication (or intent to publish) a request for public comments in the Federal Register

The Department published a notice in the Federal Register soliciting public comments for a period of 60 days. The Department received one comment. The commenter suggested that the burden calculation was inaccurate because it did not account for the burden on the non-federal healthcare providers who were filling out the DS-6570. The Department agrees and has provided revised burden estimates in paragraph 12. The other allegations from the commenter, including Privacy Act concerns, are without merit. The Department is in compliance with the Privacy Act, and the relevant System of Records Notice is up to date. Finally, the commenter cites EO 12866 in asking for a meeting with OIRA. We note that EO 12866 relates to rulemaking and does not provide any procedures under the Paperwork Reduction Act

9. Are payments or gifts given to the respondents?

The Department does not make any type or form of payment to the respondent.

10. Describe assurances of privacy/confidentiality

Medical records and other medical information associated with a particular individual are governed under the Privacy Act of 1974, 5 U.S.C. § 552a. The Bureau of Medical Services is authorized to collect this health information pursuant to section 904 of the Foreign Service Act, 22 U.S.C. § 4084. The relevant System of Records Notice for the collected information is State-24, Medical Records, which contains a list of routine uses as well as the administrative, technical and physical safeguards for the protection of this information.

11. Are any questions of a sensitive nature asked?

This is a medical document and asks personal medical questions. Questions are limited to identifying health issues that could lead to a sudden medical emergency or a health issue that would inhibit the individual's ability to self-evacuate in a conflict situation.

12. Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection

The Office of Medical Clearances receives approximately 1,900 DS-6570 responses annually, taking approximately 30 minutes for respondents to complete the form. The annual hour time burden for respondents to complete the form is 1,266 hours (1,900 responses x 40 minutes / 60). The Department estimates that 1,900 non-federal physicians will be consulted by respondents. The physician will take approximately 30 minutes to complete the form. Their burden will be 950 hours (1,900 x 30 minutes/60).

The total hourly burden is 2,216 hours (1,266 + 950).

The mean hourly wage for civilians across all occupations is \$24.98. The average mean wage rate for DS-6570 respondents is \$30.00 (\$24.98 * 1.2, rounded). The Department multiplied the wage rate by 1.2 to account for the cost of fringe benefits and overhead costs. The total applicant hourly cost is \$57,000 (\$30.00 x 1,900 respondents).

For physicians, physicians, the hourly wage in the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA area amounts to an hourly base rate of \$107.21. The total hourly cost for physicians is \$203,699 (\$107.21 x 1,900).

The total hourly cost for all respondents is \$57,000 + \$203,699 = \$260,699.

**Wages are derived from the U.S. Bureau of Labor Statistics 2024 National Occupational Employment and Wage Estimates.*

13. Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.

There is no monetary burden placed on respondents.

14. Describe the cost incurred by the Federal Government to complete this collection.

The estimated average wage rate for the office is a General Schedule 12, Step 5 in the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA area, which amounts to an hourly base rate of \$48.78. The average hourly cost of benefits for federal employees, across all levels of education, is \$28.54 (adjusted from \$26.50 in FY2015 dollars). The U.S. Department of State's estimated hourly overhead expense is \$16.67 per hour. The Office of Medical Clearances' total average cost per employee, factoring wage, benefits, and overhead, is \$93.99 per hour.

The cost burden to process a DS-6570 is \$15.08 (total average hourly cost per employee x [10 / 60]). The annual cost to the federal government to process DS-6570 forms is \$28,652.00 (the cost burden to process the response x total annual responses).

15. Explain any changes/adjustments to this collection since the previous submission

This is a renewal of a previously approved collection. The changes to the document include: correcting typographical errors; formatting the font for clarity; updating the questions.

16. Specify if the data gathered by this collection will be published.

The Department will not publish the results of this collection.

17. If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.

The Department will display the expiration date for OMB approval of the information collection.

18. Explain any exceptions to the OMB certification statement below.

The Department is not seeking exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.