

Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
Information Collection Request (ICR)
OMB 1140-0056
Special Agent Medical Preplacement
ATF Form 2300.10

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Explain the circumstances that make the information collection necessary.

Medical standards are part of the general requirement for specific positions in the federal government. Medical requirements are created for positions that involve arduous/hazardous duties or require a high standard of human reliability. In general, there must be a direct relationship between the medical standard or physical requirement and the actual duties of the position being filled. Failing to meet an established medical standard or physical requirement means that the individual is not qualified for the position. 5 CFR 339.301 authorizes agencies to require a routine pre-appointment examination as part of qualifying for a position with specific medical standards.

The Office of Personnel Management (OPM) identified the positions of criminal investigator (special agent), GL/GS-1811, and explosives enforcement officer, GS-1801, as having specific medical requirements. The qualification standard for Criminal Investigation series (special agent) and General Inspection, Investigation, Enforcement, and Compliance series (explosives enforcement officer) are published online in OPM's *General Schedule Qualification Standards*¹ under the [Standards by Occupation Series tab](#), 1800-1899 series. These medical requirements are part of the basic prerequisites for both positions.

OPM established two forms agencies could use to collect pre-appointment medical information — the Certificate of Medical Examination, OF 178, and the Report of Medical History, SF 93. However, these are generic forms that are used for any position, not just for criminal investigators (special agents) or explosives enforcement officers. Therefore, they are not specific to the duties of either position. Additionally, they do not capture information that is essential in the law enforcement context. For example, they do not address the issues of blood lead or the use of respirators. When these forms were developed, many of the environmental factors to which criminal investigators (special agents) and explosives enforcement officers are routinely exposed, were not considered or perhaps were nonexistent.

As a result, ATF developed ATF Form 2300.10, Special Agent Medical Preplacement, to replace the generic OPM forms and to address the specific duties and circumstances for criminal investigator (special agent) or explosives enforcement officer positions. The form collects

¹ Previously, the qualification standard for criminal investigator (special agent) was published in the *Qualification Standards Operating Manual*, beginning at page IV-B-229, while the medical requirements for the Explosives Enforcement Officer were included on pages IV-B-231 and IV-B-232.

specific identifiable data, such as the name, address, telephone, social security number, and medical data, necessary to identify the applicant and to assess whether they meet the positions' qualification standards.

2. Indicate how, by whom, and for what purpose the information will be used.

ATF must collect the information requested on the form to determine whether an applicant is qualified for the position. ATF uses the information to make a preliminary determination as to whether an applicant is qualified to serve either as a criminal investigator (special agent) or explosives enforcement officer. Management officials also consider the information when determining whether to hire a candidate for either position.

Applicants from outside ATF use the form to apply for these positions, and existing special agents and explosives enforcement officers who are applying for similar positions at ATF also use the form. These positions have specific medical standards and physical requirements, and the information on the form is used to determine medical suitability for either position. The applicant completes the first part of the form, and the doctor/health care provider completes the second part. When the form is completed, the medical provider sends the form and supporting documentation to the federal occupational health office at the Department of Health and Human Services, which processes the information and facilitates assessing whether the applicant meets the standards. HHS then notifies ATF of the results of their assessment.

3. Describe whether, and to what extent, the information collection involves using automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronically submitting responses, and the basis for the decision to adopt this means of collecting.

ATF Form 2300.10 is available to download from the ATF public website, but ATF sends the form specifically to each applicant. The form is electronically fillable and signable by both the applicant and the doctor/health care provider who completes the second half. When the form is completed, the medical provider sends the form and supporting documentation electronically to HHS. HHS then notifies ATF by email of the results of their assessment. All the steps in the process can be completed electronically.

4. Describe efforts to identify duplication.

This information is not duplicative and requires applicants to provide a specific set of medical information necessary to meet standards for these particular jobs. Applicants provide this information when they apply for one of these positions. While they may have already submitted one of these forms when applying to a previous job of this kind at ATF, their medical and physical conditions change over time. The medical facility that fills out the second half of the form conducts the medical examinations and tests that comprise much of the requested information, as part of the qualification process, so that information must be provided anew and may differ each time. The information is not duplicated in any other collection.

5. If the information collection impacts small businesses or other small entities, describe

any methods used to minimize burden.

This information collection does not have a significant impact on small entities. It applies to individuals, not businesses or entities.

6. Describe the consequences to federal programs 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.

If pre-appointment medical information is not collected, ATF will be unable to determine whether an applicant is qualified for the position of criminal investigator (special agent) or explosives enforcement officer at ATF. In many cases, if not all, that would result in the applicant not being selected for the position.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

There are no special circumstances associated with this information collection, which is conducted in a manner consistent with 5 CFR 1320.6. The pre-appointment medical examination is a one-time examination.

8. If applicable, provide a copy, and identify the date and page number, of the agency's notice published in the *Federal Register*, as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submitting to OMB.

The 60-day notice was published in the *Federal Register* on 12/20/2026 (91 FR 66365). The comment period ended on 12/21/2026. **ATF received no comments.** ATF published the 30-day notice on **[DATE] (xx FR xxxxx)**, with an OMB comment period ending on **[DATE]**.

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

ATF does not provide payments or gifts in connection with this collection.

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

ATF has not assured respondents of confidentiality. However, the information being collected includes PII and is thus protected by the Privacy Act. The information is maintained by ATF in a system of records, Justice/ATF-007, Personnel Record System. The form that accompanies this ICR includes a Privacy Act statement that covers this information and informs respondents of the system of records, routine uses, etc.

The information being collected also includes medical records, which are protected under a government-wide Privacy Act system of records established by OPM, the Employee Medical File System (EMFS). Information about this system of records, and how EMFS records are

protected, is set forth in 5 CFR part 297.

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.

The requested information includes specific medical questions, related to and necessary for determining whether the applicant qualifies for a position with certain medical standards and physical requirements.

12. Provide estimates of the information collection's hour burden.

ATF estimates that it will receive 1,000 applications annually over the next three years for these two types of positions. ATF anticipates this increase in the number of respondents because of new funding and task forces needing these types of agents. Each applicant responds one time. We continue to estimate that it takes applicants 45 minutes (0.75 hours) to complete their portion of the form and undergo the medical visit so the physician can complete the form. Therefore, the total applicant burden is 750 hours (1,000 respondents * .75 hours). The Workforce Wellness and Services Division maintains the form as long as the applicant is an ATF employee.

To calculate hourly wage burdens for applicants under this ICR, ATF used a leisure wage rate, as the applicants would be applying for a job, so not completing this ICR as part of their employment. ATF estimated a leisure wage rate based on methodology from HHS, updated to account for the latest available data.² Based on the most-recent median weekly household wage information from the Bureau of Labor and Statistics, ATF estimates that the hourly leisure wage rate for persons applying for one of these positions is \$26.10.³ The monetized hourly burden for this ICR is therefore \$19,575 (750 hours * \$26.10 leisure wage rate).

Table 1. Estimated annualized respondent cost and hour burden

Activity	Number of respondents	Frequency	Total annual responses	Time per response (hours)	Total annual burden (hours)	Hourly rate*	Monetized value of respondent time
Applicants completing their portion of the form	1,000	1	1,000	0.75	750	\$26.10	\$19,575

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

² Jennifer R. Baxter, et al., *Valuing Time in U.S. Department of Health and Human Services Regulatory Impact Analyses: Conceptual Framework and Best Practices* (June 2017), <https://aspe.hhs.gov/sites/default/files/private/pdf/257746/VOT.pdf>.

³ News Release, Bureau of Labor and Statistics, *Usual Weekly Earnings for Wage and Salary Workers*, third quarter 2025, (Dec. 4, 2025), https://www.bls.gov/news.release/archives/wkyeng_12042025.pdf

There are no start-up or other additional costs associated with this information collection. This form is now completed electronically, so no longer entails printing, mailing, or related costs.

14. Provide estimates of the annualized cost to the federal government.

ATF estimates no additional costs to the federal government associated with this collection. This is due to the current staffing and administrative capacity already in place to complete medical exams for this and other purposes and any marginal processing required under this information collection, with long-term staffing capacity serving as a sunk cost.

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

ATF anticipates a program change affecting this information collection, in that ATF anticipates an increase in hiring for affected positions over the next three years. As a result, ATF adjusted the hourly burden due to a significant increase in the annual number of applicants since the last renewal, from 380 to 1,000, an increase of 620. This resulted in a corresponding increase in the total number of burden hours associated with this IC from 285 during the last renewal, up by 465 hours to 750 hours for this renewal.

16. For information collections whose results will be published, outline plans for tabulations and publication.

ATF does not publish the results of this information collection.

17. If seeking approval to not display the expiration date for the information collection, explain the reasons that display would be inappropriate.

ATF intends to display the OMB expiration date for this information collection.

18. Explain each exception to the certification statement.

This information collection does not include any exceptions to the certification statement.

B. INFORMATION COLLECTIONS EMPLOYING STATISTICAL METHODS.

This collection does not employ statistical methods.