

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

A. Justification

1. 5 CFR 339.301 provides the authority to require a routine pre-appointment examination for a position with specific medical standards. Medical standards are part of the qualification standards for positions in the Federal government. In general, there must be a direct relationship between the medical standard or physical requirement and the actual duties of the position being filled. Failure to meet an established medical standard of physical requirement means that the individual is not qualified for the position. Medical requirements for positions that involve arduous/hazardous duties or require a high standard of human reliability are based on the arduous or hazardous nature of the duties typically performed in most of the positions covered.

Criminal Investigator, GL/GS-1811, and Explosives Enforcement Officer, GS-1801 has been identified as positions that have specific medical requirements. The qualification standard for Criminal Investigator is published in the *Qualification Standards Operating Manual* beginning at page IV-B-229, with the medical requirements for the Explosives Enforcement Officer on pages IV-B-231 and IV-B-232. These medical requirements are part of the basic qualification requirements for the position.

Pre-appointment medical information is currently being required. It is collected now on two forms. One is the United States Civil Service Commission Certification of Medical Examination, Standard Form No. 78, October 1969 (Revision) and the other is Report of Medical History, Standard Form 93, Rev. June 1996. Both are Office of Personnel Management forms. They are generic forms that are used for any position, not just for Criminal Investigators or Explosives Enforcement Officers. Therefore, they are not specific to the duties of the positions. Additionally, they do not capture information that is essential in the evolution of law enforcement. 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 Criminal Investigators and Explosives Enforcement Officers are routinely exposed to today, were not considered or perhaps didn't exist.

ATF F 2300.10, Special Agent Medical Preplacement replaces two existing generic forms and address the specificity of the duties of the Criminal Investigator. The form collects specific identifiable data, these elements are name, address, telephone, social security number and certain medical data.

2. The information on the form must be collected in order to determine whether or not an applicant is actually qualified for the position. The information will be initially used to make a recommendation on either hiring or not hiring an applicant for the Criminal Investigator or Explosives Enforcement Officer. It will be further used by management officials in making the management decisions on whether to hire or not to hire.
3. ATF F 2300.10 is not available on the ATF website because the form is specifically used by special agents and explosives enforcement officers who are applying for a specific criminal investigator or explosives enforcement officer position with ATF. This position has specific medical standards and physical requirements. The information on the form is used to determine medical suitability for the position. The special agent and explosives enforcement officer applicant completes the first half of the

form and the doctor/health care provider completes the second half. When the form is completed, it is sent by UPS to Law Enforcement Medical Programs in Atlanta, GA by the health care provider.

4. ATF uses a uniform subject classification system to identify duplication and to ensure that any similar information already available cannot be used or modified for use for the purpose of this information collection.
5. The collection of this information will not impact small businesses or other small entities.
6. If pre-appointment medical information is not collected, we will be unable to determine whether or not an applicant is qualified for the position of Criminal Investigator or Explosives Enforcement Officer.
7. The pre-appointment medical examination is a one-time examination. There are no special circumstances associated with this information collection.
8. Collection of pre-appointment medical information for positions in the Federal government has been a requirement for qualification determination since at least 1947. The ATF Human Resources Operations Division and the ATF Special Agent/IOI Services Branch were consulted in the creation of this form. A 60-day Federal Register notice was published and received one public comment for which the ATF provided a response. A 30-day notice to solicit public comments will be published in the Federal Register momentarily.
9. No payment or gift will be made to any respondent for this information collection.
10. Medical records are part of a Government-wide Privacy Act system of records. 5 CFR 293.504, Composition of, and access to, the Employee Medical File System sets the assurance of confidentiality. ATF F 2300.10 is maintained in a secured room and employees that process the form have a special clearance.
11. There are specific medical questions that are asked in order to determine medical suitability to qualify for a position that has specific medical standards and physical requirements.
12. We estimate that 120 agents will be selected for employment. Each agent will respond 1 time. We estimate that it will take the agent 30 minutes to complete his/her portion of the form and medical personnel will take approximately 15 minutes to complete the form for a total of 45 minutes. Therefore, the total burden will be 90 hours. The form will be maintained in the Human Resources Operations Division for as long as the agent is employed with the Bureau of Alcohol, Tobacco, Firearms and Explosives.
13. The health care provider sends the form by UPS to Atlanta, GA at a cost of \$12.00 per form. The total cost associated with this information collection is \$1,440.00.
14. Estimated cost to the Federal government would be approximately \$300.00 for in-house printing of the form.
15. The adjustments associated with this collection are decrease in the number of respondents and burden hours; and increase in cost due to postal rate increase.
16. Results of this information collection will not be published.
17. The Bureau of Alcohol, Tobacco, Firearms and Explosives requests that the expiration date not be printed on the form. There is no expectation of changes in the form unless there are significant changes in the position. The collection of medical information for pre-appointment is an on-going process. We

believe printing costs would be kept at a minimum if we did not have to reprint every three years to accommodate an expiration date.

18. There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

None