

PUBLIC SUBMISSION

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NRC Form 646, "Formal Discrimination Complaint" - Information Collection

Comment On: NRC-2021-0098-0003

Information Collection: NRC Form 646, "Formal Discrimination Complaint"

Document: NRC-2021-0098-DRAFT-0003

Comment on FR Doc # 2022-02943

Submitter Information

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General Comment

In response to the NRC specific questions proposed:

1. The proposed collection of information is NOT necessary to be captured on a new form. It is previously captured in the counselor's report. The information may have practical utility based on information gathered to support a claim.
2. The estimated burden for information collection appears to be incorrect. Bullet 9 of the Background states, ". The estimated number of hours needed annually to comply with the information collection requirement or request: 30 hours." If the number of estimated responses is 30, often times one hour per response is insufficient. This creates an unusually burdensome requirement.
3. To make the information more efficient, consolidate the Counselor's Report and the proposed new form.
4. Minimizing the burden may be accomplished via automated systems; however, various departments, commissions, bureaus, etc. have consistently shown they are inadequate to provide security to the personally identifiable information.