

SUPPORTING STATEMENT

2700-0063

A. Justification.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Authority for creation of the NASA Safety Reporting System (NSRS) is found in the Space Act, 42 U.S.C. 2451. In addition, NPG 8715.3 (The NASA Safety Manual) directs the Associate Administrator for Safety and Mission Assurance to implement a backup safety notification system. The safety notification is designed to afford individual NASA and contractor employees with a mechanism to alert NASA Headquarters to potential safety concerns that have not been resolved adequately through normal, local safety reporting processes. Creation of a strengthened safety office was also one of the major recommendations of the Presidential Commission which investigated the Challenger accident, and implementation of the NSRS is one manifestation of NASA's commitment to meeting the Commission's recommendation.

1. Indicate how, by whom, how frequently, and for what purpose the information will be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The NSRS was established to provide a fast response hazard identification and reporting system, which aids in the elimination of unsafe conditions and the prevention of accidents. In addition, the NSRS serves as a mechanism for elevating problems to selected upper management when standard channels fail. The NSRS is a voluntary, anonymous, and non-punitive supplement to formal safety reporting procedures and is administered by an independent agent, Futron Corporation of Bethesda, Maryland. The only means of reporting to the NSRS is the NSRS report form, which is available to all NASA and contractor employees. During the first year of operation the NSRS handled safety hazard reports pertaining to the Space Shuttle program. Subsequently, the NSRS has been expanded to handle safety hazard reports pertaining to all NASA programs, projects, and operations. Over 550 reports have been received by mail since the inception of the program, and the information provided by these reports has resulted in numerous direct changes to NASA policies, procedures, and operations which have significantly reduced NASA's safety risk.

2. 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. Also describe any consideration of using information technology to reduce burden.

The NSRS is designed, first and foremost, to be an anonymous hazard reporting system whereby NASA civil servants and contractors can notify NASA's upper management of safety concerns. Paramount is the protection of that anonymity, and the continued trust and confidence on the part

of the submitters that their anonymity will never be compromised. The current, paper-based reporting system ensures the protection of a submitter's anonymity and secure submission of their report by way of the U.S. Postal Service. An independent contractor receives and processes incoming NSRS reports. The contractor removes submitters' identifying information (known as the identification strip) and forwards a transcribed version of the reporter's concerns to the NASA Headquarters Office of Safety and Mission Assurance for immediate analysis and investigation. The report is transcribed in an attempt to cloak the submitter's handwriting and writing style. Unfortunately, electronic and computer based submissions would be at greater risk of government or outside monitoring and/or interception, and the awareness of that possibility in the minds of potential NSRS submitters has a chilling effect on their future willingness to trust and use an electronic reporting system.

4. Describe efforts to identify duplication.

The NSRS is a unique, overarching safety reporting system that supplements local NASA civil servant and contractor hazard reporting systems. NASA civil servants and contractors are encouraged to first report hazards and safety concerns using local established safety reporting procedures. They are encouraged to use this alternate system when: a) they have reported a hazard locally and have seen no action taken, b) they are not satisfied with the response to a locally reported hazard, or c) they fear reprisal if they were to report the hazard through their local reporting system. The NSRS is the only Agency wide safety reporting system that encompasses all NASA civil servant and contractor programs, projects, and operations.

5. If the collection of information impacts small businesses or other small entities (Item five of form OMB 83-I, the Paperwork Reduction Act Submission form), describe any methods used to minimize burden.

Not applicable.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The NSRS is a critical element of NASA's overall approach to ensuring safety and mission success for all NASA activities. Without the NSRS, NASA's upper management would not have a direct and anonymous Agency wide line of communication for NASA civil servants and contractors to report hazards or safety concerns that could potentially harm the general public, the NASA workforce, NASA facilities and equipment.

7. Explain any special circumstances that would cause an information collection to be conducted in certain manners (as listed).

Not applicable

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 before submission to OMB.

See attached Federal Register notices. FRN 1 was published on June 2, 2006, Federal Register Vol. 71, No. 106. FRN 2 was published on July 27, 2006, Federal Register Vol. 71, No. 144. No comments were received on FRN 1 or FRN 2.

8. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable.

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

Prospective reporters are notified by brochure that their identity will remain anonymous and that anonymity is reemphasized on the report form. The report form specifically states: "this identification section will be separated from the report and mailed back to you to protect your anonymity. YOUR IDENTITY WILL NOT BE SHARED WITH NASA AT ANY POINT. NO RECORD OF YOUR IDENTITY WILL **BE KEPT.**"

9. 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.

Not applicable.

10. Provide estimates of the hour burden of the collection of information.

An average of 75 reports is received annually. An estimate of 15 minutes is required to fill out each report, resulting in a total annual burden of approximately 19 hours.

11. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There is no cost to respondents or record keepers.

14. Provide estimates of 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, and any other expense that would not have been incurred without this collection of information.

The annualized cost to the Federal government is approximately \$188,000. This includes the cost of investigation of the condition or situation by the principal NASA investigator and supporting investigative team (\$100,000), the cost of the promotional material (\$8,000), and the cost of the administration of the NSRS (\$80,000). The NSRS is administered for NASA's Office of Safety and Mission Assurance by Futron Corporation, and NSRS administration costs include report processing, database maintenance, and administration of an ongoing awareness program.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

Not applicable.

14. For collections of information intended for publication, outline plans for tabulation and publication.

Not applicable.

14. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display may be inappropriate.

Not applicable

15. Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-1.

Not applicable.

B. Collections of Information Employing Statistical Methods.

The collection does not employ statistical methods.