

School Dismissal Monitoring System

**Existing Data Collection in use without an OMB Control Number
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Contact:

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**School Dismissal Monitoring System
Request for OMB Approval of an Existing Data Collection
in use without an OMB Control Number**

The Centers for Disease Control and Prevention (CDC) is requesting OMB approval of an existing data collection in use without an OMB Control Number. Although CDC is currently collecting data using this system under OMB Control No. 0920-0008, Emergency Epidemic Investigations, CDC would like to continue the data collection long term. CDC is requesting a 3 year approval to collect data.

A. Justification

1. Circumstances Making the Collection of Information Necessary

During the spring 2009 H1N1 outbreak, the U.S. Department of Education (ED) and the Centers for Disease Control and Prevention (CDC) received numerous daily requests about the overall number of school dismissals nationwide and the number of students and teachers impacted by the school dismissals. CDC and ED recognized the importance of having a mechanism in place to collect this information and gauge the impact of the outbreak. Thus, CDC and ED developed a standardized data collection instrument to obtain this data and have begun to collect data under OMB Control No. 0920-0008, Emergency Epidemic Investigations. Data collections under OMB Control No. 0920-0008 are permitted for 90 days. Since CDC expects school closures to occur beyond the 90 day period and would like to collect this data over the long term, CDC is requesting OMB approval for this data collection under a separate OMB Control Number.

In the spring of 2009, illness among school-aged students (K-12) in many states and cities resulted in at least 1351 school dismissals due to rapidly increasing absenteeism among students or staff. These dismissals impacted at least 824,966 students and 53,217 teachers. Although an informal process was put in place, in conjunction with ED, to track school closures, there was no formal monitoring system established, making it difficult to monitor reports of school dismissal, to characterize factors associated with differences in morbidity and mortality due to influenza in the schools and surrounding communities, or to describe the characteristics of the schools experiencing outbreaks and the steps and control measures taken by those schools. In August 2009, CDC issued “CDC Guidance for State and Local Public Health Officials and School Administrators for School (K-12) Responses to Influenza during the 2009-2010 School Year” (Attachment 3). The purpose of the School Dismissal Monitoring System is to generate accurate, real-time, national summary data daily on the number of school dismissals and the number of students and teachers impacted by the school dismissals. CDC and ED will use the data to better understand how schools are responding to CDC community mitigation guidance among schools and students and the impact of influenza outbreaks on school systems and communities. The School Dismissal Monitoring Form is found at Attachment 4.

In the fall of 2009, CDC's School Dismissal Monitoring System detected 1,947 school dismissals impacting approximately 623,616 students and 40,521 teachers nationwide. These data were used widely throughout the U.S. Government for situational awareness and specifically at CDC to assess the impact of CDC guidance and community mitigation efforts in response to the H1N1 outbreak.

CDC is authorized to collect this data under the Public Health Service Act (42 USC 241), Section 301 (Attachment 1).

Privacy Impact Assessment

Overview of the Data Collection System

Direct reports from schools and school districts are handled in two ways. States with a school dismissal monitoring system already in place at the start of the 2009-2010 school year provide a list of dismissed schools to CDC daily. CDC provides one-on-one technical assistance to any state considering such a system for the 2009-2010 school year and jointly determines with the state how best to share data.

If a state does not have a sustainable school dismissal monitoring system as described above, then schools, school districts, and local health agencies are encouraged to use the School Dismissal Monitoring System to report school dismissals to CDC and state agencies. The use of the School Monitoring System is supported by the Association of State and Territorial Health Officials (ASTHO), the Council of State and Territorial Epidemiologists (CSTE), the National Association of County and City Health Officials (NACCHO), and many national education organizations including the American Association of School Administrators, the National Association of Independent Schools, the National School Boards Association, and the National School Nurses Association.

The common reporting form (Attachment 4) requires only the name and zip code of the school or school district, the date they first dismiss students, and the projected date they plan to re-open. Schools, school districts, and local public health agencies may complete this form via the Web (www.cdc.gov/FluSchoolDismissal), email (FluSchoolDismissal@cdc.gov), or fax (770-488-6156). All Web and email submissions are sent simultaneously to CDC and a designated state agency. All faxed submissions to CDC are emailed as a PDF file to a designated state agency. CDC requests each state to provide only one email address for this purpose.

For all submitted reports of a school dismissal, CDC uses publicly available information from the National Center for Education Statistics to determine the number of students and teachers impacted. The National Center for Education Statistics is part of the Department of Education. Their website is located at www.nces.ed.gov.

Items of Information to be Collected

The items to be collected are found on the common reporting form. The data collection request specifies the following pieces of information:

- Name of school district
- Zip code of school district
- Date of school or school district dismissed
- Date school or school district projected to reopen

There is no mandatory collection of individually identifiable information in this information request. The common reporting form includes the following data items that are optional:

- Name of person submitting information
- Organization/Agency
- Phone
- Email

Identification of Website(s) and Website Content Directed at Children Under 13 Years of Age

School districts and local public health agencies may submit the requested data via the Web at www.cdc.gov/FluSchoolDismissal. This website and the common reporting form are designed for professional public health and education officials and are not directed towards children under 13 years of age.

2. Purpose and Use of Information Collection

The purpose of this monitoring system is to generate accurate, real-time, national summary data daily on the number of school dismissals and the number of students and teachers impacted by the dismissals. During the Spring 2009 initial outbreak of H1N1, CDC and the Department of Education (ED) received many requests from throughout the federal government (Department of Health and Human Services, Department of Homeland Security, and the White House), from states, and from the media for information on H1 N1-related school dismissals. In response, reactive monitoring activities were undertaken by CDC and ED; however, no national system was in place to monitor dismissals and neither ED nor CDC had official authority to require reporting of school dismissals. In anticipation of additional school of additional school dismissals during the fall of 2009, CDC and ED determined it was necessary to put a formal school dismissal monitoring system in place to be better able to respond to requests for information, to contribute to situational awareness, and to help assess the impact of CDC guidance and community mitigation efforts. Without such a system, CDC and Ed could not have responded as needed. Since this information is generated by an easily accessible system, the task of monitoring the response to CDC guidance is much less cumbersome than it was during the spring response to the H1N1 outbreaks.

Respondents for this data collection are schools, school districts, and public health agencies. Responses are only needed when schools close during an outbreak.

Privacy Impact Assessment Information

CDC has determined that the information to be collected is necessary to study the impact of an H1N1 outbreak as it relates to community mitigation activities. The information has been used to help understand how CDC guidance on school dismissals has been implemented at the state and local levels nationwide and to help determine how this guidance might be more helpful in the future. Specifically the data collection will be utilized to:

1. Determine the scope and extent of school dismissals in the United States during the spring of 2009 and during the 2009-2010 school year.
 - a. Retrospectively review data collected during the Spring outbreak of Pandemic H1N1 Influenza
 - b. Prospectively monitor schools in the Fall to identify schools with high rates of outbreaks and/or school absenteeism due to influenza like illness (ILI)
2. Describe the characteristics of schools with high rates of outbreaks and/or school absenteeism due to ILI

Respondents are required to provide non-sensitive, publically available information on the name and zip code of schools and school districts and their dates of closure and have the option of providing a contact name, phone number, and email address. Respondents are providing this information as public health and education officials and representatives of their agencies and organizations and not as private citizens. The data collection should have no impact on an individual's privacy.

3. Use of Improved Information Technology and Burden Reduction

The majority of respondents will provide their responses electronically, either via the Internet or email. Respondents also have the option of downloading the form and returning it to CDC by fax. During the spring reporting cycle, less than 1% of school systems returned the form via fax. Among all the dismissals detected, 57.4% of all dismissal events were reported via the on-line submission form. The remaining dismissals were detected through other electronic means such as media scans, Google searches, and reviews by CDC of state and local health and education agency websites.

4. Efforts to Identify Duplication and Use of Similar Information

There is currently no similar data, nor system for collecting this data, to that which is being included in this information request. CDC is the only public health agency with the scope of responsibility necessary to collect national school dismissal information.

5. Impact on Small Businesses or Other Small Entities

Some private schools may be considered small businesses. However, data collection variables are kept to an absolute minimum to minimize burden on these respondents.

6. Consequences of Collecting the Information Less Frequently

The frequency of data collection is determined by the frequency that a school dismissal has occurred. Development of guidance related to communicable diseases is

dependent on rapid identification and immediate response when identified. If data are not collected immediately, the data will not be relevant to the developing situation. There are no legal obstacles to reducing the burden.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Frequency of data collection is inconsistent with the guidelines. The frequency of data collection is determined by the frequency that a school dismissal has occurred, but technically cannot occur more than once a day. A given school may close and re-open more than once in a quarter, but to date that is a rare event.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A. A 60 day Federal Register Notice was published in the *Federal Register* on November 3, 2009, Vol. 74, No. 211, pp. 56840-56841 (Attachment 2). There were no public comments.

B. The School Dismissal Reporting Form was developed jointly by the CDC and ED CDC representatives included those from the Division of Global Migration and Quarantine, National Center for Preparedness, Detection, and Control of Infectious Diseases and the Division of Adolescent and School Health, National Center for Chronic Disease Prevention and Health Promotion. CDC has worked with William Modzeleski, Associate Assistant Deputy Secretary, Office of Safe and Drug Free Schools, Department of Education, phone (202) 260-1856, email Bill.Modzeleski@ed.gov.

9. Explanations of Any Payment or Gift to Respondents

There are no payments or gifts to respondents.

10. Assurance of Confidentiality Provided to Respondents

The Privacy Act does not apply to this data collection. Respondents are organizations or governmental agencies. Individuals who respond are doing so as public health and education officials and representative of their organizations and governmental agencies. Respondents are asked to provide a contact name for the organization/agency; however, providing that information is optional.

Privacy Impact Assessment Information

A. This submission has been reviewed by CDC's Information Collection Review Office, who determined that the Privacy Act does not apply. Respondents are public health and education officials and representatives of their organizations or governmental agencies. Individuals who respond are doing so as representative of these organizations and governmental agencies. Respondents are asked to provide a contact name for the organization or agency; however, providing that information is optional.

B. Because a school dismissal does not occur without notification of the public, all information collected by this system is already known publicly. The information collected does not contain any required personal identifiers though any that is submitted

is optional and is provided by public health and education officials acting as representatives of the organizations and governmental agencies not as private citizens. Nonetheless, all information submitted through the system is stored on an internal CDC intranet website accessible only to authorized CDC staff and backed up and supported by all standard CDC security measures. Access is restricted to a minimal number (n=4) of agency employees with a bona fide “need to know” in order to carry out the duties of their positions or to accomplish the purposes for which the data were collected. Any faxed submissions are stored in locked cabinets in locked offices when not in use.

C. Participation in the School Dismissal Monitoring System is voluntary. Participation in the system indicates consent.

D. Respondents are asked to provide a contact name for the organization/agency; however, providing that information is optional.

11. Justification for Sensitive Questions

This data collection does not contain any questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Public reporting burden of this collection of information is estimated to average 5 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Respondents are state and local school officials, school district officials, and state or local health agency officials. To estimate annualized burden costs, we have used the hourly wage for a GS-7, step 5 Administrative Assistant.

A. Estimated Annualized Burden Hours

Respondent	Number of Respondents	Responses per Respondent	Average Burden per Respondent (in hours)	Total Burden (in hours)
School, school district or health department	500	1	5/60	42
Total				42

B. Estimated Annualized Burden Costs

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Cost
School, school district or health department	42	\$14.68	\$616.56
Total			\$616.56

13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

There is no estimated other total annualized cost burden for either respondents or recordkeepers.

14. Annualized Cost to the Government

Costs to the Federal government are listed in the table below.

Required Staff	GS Level	Cost
Project Lead (100%)	AD 00/00	\$201,899
Project Sub-Lead (100%)	GS 14/8	\$153,475
Database Managers (contractors - 2)	N/A	\$255,504
Total		\$610,878

Total Cost to the Federal government: \$610,878

15. Explanation for Program Changes or Adjustments

This is a existing collection in use without an OMB Control Number.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no immediate plans for tabulation or publication of data. However, any data that is to be published would be published in either CDC’s *Morbidity and Mortality Weekly Report (MMWR)* or in a peer-reviewed journal.

Summary data generated by the system are released daily by ED and CDC to the media and shared widely throughout the USG including at CDC, HHS, ED, and the Department of Homeland Security (DHS) and are included in multiple daily H1N1 situational reports at CDC, HHS, ED, and DHS.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

CDC is not seeking a waiver of the requirement to not display an expiration date.

18. Exceptions for Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

B. Collections of Information Employing Statistical Methods

This data collection does not employ statistical methods. Direct reports from schools and school districts will be handled in two ways. States with a school dismissal monitoring system already in place at the start of the 2009-2010 school year need only provide a list of dismissed schools to CDC. CDC is asking that state-based systems report to CDC daily, real-time data on school dismissals for both public and private schools grades K-12. CDC will provide one-on-one technical assistance to any state considering such a system for the 2009-2010 school year and jointly determine with the state how best to share data.

If a state does not have a sustainable school dismissal monitoring system as described above, then schools and local districts will be encouraged to use a common electronic reporting form to report school dismissals to CDC and state agencies. The use of the School Monitoring System is supported by the Association of State and Territorial Health Officials (ASTHO), the Council of State and Territorial Epidemiologists (CSTE), the National Association of County and City Health Officials (NACCHO), and many national education organizations. CDC, NACCHO, and national education organizations will promote the use of the common form and will post a link to the form on their websites. CDC and the Department of Education (ED) will also support use of the common school dismissal monitoring reporting form in novel H1N1 virus communications.

The School Dismissal Form requires only the name and zip code of the school or school district, the date they first dismiss students, and the projected date they plan to re-open. Optional information includes the name of the person submitting the form; the organization/agency; phone number; and email address. Respondents can submit the form electronically via the Internet or email the form to the state and CDC. CDC requests each state to provide only one email address for this purpose.

A common reporting form (Attachment 4) has been created that requires only the name and zip code of the school or school district, the date they first dismiss students, and the projected date they plan to re-open. School districts and local public health agencies may complete this form via the Web (www.cdc.gov/FluSchoolDismissal), email (FluSchoolDismissal@cdc.gov), or fax (770-488-6156). All Web and email submissions will be sent simultaneously to CDC and a designated state agency. All faxed submissions to CDC will be emailed as a PDF file to a designated state agency.

List of Attachments

- 1. Public Health Service Act (42 USC 241) Section 301**
- 2. 60 day Federal Register Notice**
- 3. CDC Guidance for State and Local Public Health Officials and School Administrators for School (K-12) Responses to Influenza during the 2009-2010 School Year**
- 4. School Dismissal Reporting Form**