

**School Dismissal Monitoring System (SDMS)**

**Request for Revision**

**OMB Control Number 0920-0849**

**Supporting Statement A**

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**Contact:**

**Amy McMillan  
Office of Policy and Planning  
National Center for Emerging and Zoonotic Infectious Diseases  
Centers for Disease Control and Prevention  
1600 Clifton Road, N.E., MS D76  
Atlanta, Georgia 30333  
Phone: (404) 639-4895  
Fax: (404) 248-4146  
Email: [auh1@cdc.gov](mailto:auh1@cdc.gov)**

## **School Dismissal Monitoring System (SDMS)**

### **Request for Revision**

**OMB Control Number 0920-0849**

The Centers for Disease Control and Prevention (CDC) is requesting OMB approval for a revision of an existing data collection. CDC is requesting a 3 year approval to collect data.

CDC is requesting a revision to a currently approved information collection. During the 2009 H1N1 pandemic influenza response, there was considerable interest in the reasons why dismissals were occurring. This revision requests the addition of a field for the reason for dismissal into the existing data collection form, and an increase of 166 burden hours due to a revised estimate of respondent burden given lessons learned during the response to the 2009 H1N1 pandemic influenza.

#### **A. Justification**

##### **1. Circumstances Making the Collection of Information Necessary**

In its 2007 “Interim Pre-pandemic Planning Guidance: Community Strategy for Pandemic Influenza Mitigation in the United States” (Attachment 1), CDC recommended using dismissal of students from schools as an early intervention to mitigate the influenza pandemic before appropriate vaccine was produced and distributed to the population.

In the spring of 2009, the beginning of H1N1 influenza pandemic, illness among school-aged students (K-12) in many states and cities resulted in at least 1,351 school dismissals. These dismissals impacted at least 824,966 students and 53,217 teachers. During that time, the U.S. Department of Education (ED) and 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 school dismissals during the pandemic. Although an informal process was put in place in conjunction with ED to track school closures, there was no formal monitoring

system established. Consequently, CDC and ED launched the School Dismissal Monitoring System (SDMS) in the fall of 2009 to track reports of school closures during the H1N1 pandemic and possibly during other public health emergencies including infectious disease outbreaks and weather related events, when school closures are recommended by federal, state, or local public health or education authorities. SDMS was designed to generate accurate, real-time, national summary data daily on the number of closed schools and the number of students and teachers impacted by the dismissals. The system facilitates CDC's and ED's efforts to track implementation of CDC pandemic guidance, characterizes factors associated with differences in morbidity and mortality due to infectious disease outbreaks in the schools and surrounding communities, describes the characteristics of the schools experiencing infectious disease outbreaks, and prompts investigations to evaluate economic and social consequences of unplanned school closures. During 2009, SDMS was 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.

In the fall of 2009, SDMS 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 2009 H1N1 influenza pandemic.

The extension of the SDMS will allow for CDC to quickly activate data collection on school dismissals during public health emergencies. The information to be collected by SDMS is important to study the impact of infectious disease outbreaks as it relates to community mitigation activities. It will allow being able to better respond to requests for information, to contribute to situational awareness, and to help assess the impact of CDC guidance and community mitigation efforts during an influenza pandemic and other public health emergencies.

## Overview of the Data Collection System

During 2009, CDC and ED developed a standardized data collection instrument and collected data under OMB Control No. 0920-0008, Emergency Epidemic Investigations. CDC then received approval from OMB to collect information on school dismissals under control number 0920-0849. The School Dismissal Monitoring Form (Attachment 4) has been updated to include reasons the school or school district was closed.

The form requires only the name and zip code of the school or school district, the date they first dismiss students, the projected date they plan to re-open and, as indicated above, the reason the school or school district was closed. Schools, school districts, and local public health agencies may complete this form via the Web, email, or fax. 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.

SDMS handles direct reports from schools and school districts in two ways. States with a school dismissal monitoring system already in place provide a list of dismissed schools to CDC daily. CDC provides one-on-one technical assistance to any state considering such a system and jointly determines with the state the best approach for sharing 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 SDMS to report dismissals to CDC and state agencies.

CDC is authorized to collect these data under the Public Health Service Act (42 USC 241), Section 301 (Attachment 3).

## Items of Information to be Collected

The items to be collected are found on the School Dismissal Monitoring Form. The data collection request specifies the following pieces of information:

-Name of school or school district

- Zip code of school or school district
- Date school or school district dismissed
- Date school or school district projected to reopen
- Reasons for school or school district dismissal

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 the form
- Title of person submitting the form
- The name of their organization/agency
- Phone number
- Email address

This optional information is not kept as part of the data set, but only used for data verification procedures.

#### Identification of Website(s)

Schools, school districts, and local public health agencies may submit the requested data via the Web to a CDC website to be determined when the system is activated.

## **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 school dismissals due to public health emergencies including infectious disease outbreaks or weather related events, when school dismissals are recommended by federal, state, or local public health or education authorities.

During the Spring 2009 initial outbreak of H1N1, CDC and 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 H1N1-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. 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 during an influenza pandemic. Without such a system, CDC and ED could not have responded as needed. This information is generated by an easily accessible system, which makes the task of monitoring the response to CDC guidance much less cumbersome. Respondents for this data collection are schools, school districts, and public health agencies. Responses are only needed when schools close due to public health emergencies including infectious disease outbreaks or weather related events, when school dismissals are recommended by federal, state, or local public health or education authorities.

CDC has determined that the information to be collected is necessary to study the impact of infectious disease 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, data collection will be utilized to:

1. Determine the scope and extent of school dismissals in the United States during public health emergencies:
  - a. Prospectively monitor data to identify schools and school districts that have high dismissal rates due to infectious diseases, or that implement pre-emptive school dismissals due to other public health emergencies (such as natural disasters, radiation emergencies, chemical spills and etc.) when recommended by public health or education officials.
  - b. Retrospectively review data collected to describe impact school dismissals had on students and teachers
2. Describe the characteristics of schools and school districts with high dismissal rates due to infectious diseases or other public health emergencies.

Respondents are required to identify their respective institutions by providing non-sensitive information, to include the name and zip code of schools and school districts and their dates of closure, as well as reason for the dismissal (due to absenteeism rates among students, faculty, and staff or pre-emptive to slow the spread of infection). The respondents have the option of providing their name, title, name of their organization/agency, phone number, and email address. This optional information is not kept as part of the data set, but only used for data verification procedures. 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 fall 2009 H1N1 influenza pandemic, 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 are currently no similar data, nor systems for collecting these data, to that which are 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. Information on each dismissal will only be entered into the system once, regardless of the duration of the dismissal. A given school may close and re-open more than once in a school year, 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* 12/04/2012, Vol. 77, No.233, pp. 71797 (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 Emerging and Zoonotic Infectious Diseases and the Division of Adolescent and School Health, National Center for HIV/AIDS, Viral Hepatitis, STD, and TB Prevention.

## **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 representatives of their organizations and governmental agencies. Providing the name of the person responding, their title, their organization/agency name, as well as a phone number and email address is optional. This optional information is not kept as part of the data set, but only used for data verification procedures.

### Privacy Impact Assessment Information

- A. The data collected by SDMS are necessary to fulfill CDC's public health mission. The data will be used by CDC to prevent the spread of infectious diseases and evaluate consequences of public health emergencies in communities in the United States.
- B. 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 their name, their title, the name of their organization/agency, a phone number, and email address; however, providing that information is optional. This optional information is not kept as part of the data set, but only used for data verification procedures.
- C. Because a school dismissal does not occur without notification of the public, all information collected by this system is already known by members of the community. The information collected does not contain any required personal identifiers, though any that are submitted as optional, are not kept as part of the data set, and are provided by public health and education officials acting as representatives of 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.

- D. Participation in SDMS is voluntary. Participation in the system indicates consent.
- E. Respondents are asked to provide their name, their title, the name of their organization/agency, a phone number, and email address; however, providing that information is optional and that information is not kept as part of the data set, but only used for data verification procedures.

**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

Type of Respondent	Form Name	Number of respondents	Number of responses per respondent	Average burden per response (in hours)	Total burden (in hours)
School, school district, or health department	School Dismissal Monitoring System Reporting Form	2500	1	5/60	208
Total					208

**B. Estimated Annualized Burden Costs**

Type of Respondent	Form Name	Total Burden Hours	Hourly Wage Rate	Total Respondent Cost
School, school district, or health department	School Dismissal Monitoring System Reporting Form	208	\$14.68	\$3053.44
				\$3053.44

**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 Sub-Lead (100%)	GS 14/8	\$153,475
Online database developer (contractor)	N/A	\$150,000
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**

CDC is requesting a revision to a currently approved information collection. During the 2009 H1N1 pandemic influenza response, there was considerable interest in

the reasons why dismissals were occurring. This revision requests the addition of a field for the reason for dismissal into the existing data collection form, and an increase of 166 burden hours due to a revised estimate of respondent burden given lessons learned during the response to the 2009 H1N1 pandemic influenza.

**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 are 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 during an influenza pandemic 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 situational reports at CDC, HHS, ED, and DHS.

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

The display of the OMB expiration date is not inappropriate

**18. Exceptions for Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.

## **List of Attachments**

- 1. Interim Pre-pandemic Planning Guidance: Community Strategy for Pandemic Influenza Mitigation in the United States**
- 2. 60 Day Federal Register Notice**
- 3. Public Health Service Act (42 USC 241) Section 301**
- 4. School Dismissal Reporting Form**