

INFORMATION COLLECTION REQUEST

NEW

STATE SURVEILLANCE UNDER THE NATIONAL TOXIC SUBSTANCE  
INCIDENTS PROGRAM

Supporting Statement Part A

Justification

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Attachment B – 60-Day Federal Register Notice

Attachment C – Data Collection Flowchart

Attachment D – NTSIP State Data Collection Form (Word version)

Attachment E – NTSIP State Data Collection Form Screen Shots (Web version)

Attachment F – NTSIP Training Manual

Attachment G – NTSIP Event Eligibility Decision Tree

Attachment H – NTSIP Data Items Chart

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## A. Justification

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

This is a new Information Collection Request (ICR) for the Agency for Toxic Substances and Disease Registry (ATSDR) titled *State Surveillance under the National Toxic Substance Incidents Program (NTSIP)*. The Agency is authorized to conduct these activities under sections 104(i)(4) and (15) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA) [42 U.S.C. 9604 (i)(4) and (15)] (**Attachment A**).

The Agency is seeking Office of Management and Budget (OMB) approval for three years. The information collection would entail ongoing data collection for surveillance purposes. The 60-day Federal Register Notice is provided as **Attachment B** and is further discussed in Section A.8.

#### Background

Acute chemical incidents are largely preventable with improved knowledge, equipment maintenance, and process management. The NTSIP seeks to gather information from many sources on incidents caused by spills and acute leaks of toxic substances. The information will be used to help prevent or reduce the harm caused by toxic substance incidents. The NTSIP builds on the work of the Agency's Hazardous Substances Emergency Events Surveillance (HSEES) system which received OMB approval in 1992 and was discontinued in 2012 (OMB # 0923-0008; expiration date 01/31/2012). HSEES was the first national public health-based surveillance system that coordinated the collation, collection, analysis, and distribution of hazardous substances emergency release data to public health practitioners. More information on HSEES can be found on the ATSDR website (<http://www.atsdr.cdc.gov/HS/HSEES/>).

The NTSIP has three components: state surveillance, the response team, and a national incident estimates database. The national incident estimates database component is managed by the US Department of Transportation (DOT). The DOT HazMat Intelligence Portal (HIP) is a data warehouse that will combine and match the NTSIP datasets with existing datasets from the National Response Center (NRC) (US EPA "Notification of Episodic Releases of Oil and Hazardous Substances" OMB # 2050-0046; expiration date 03/31/2014, currently undergoing OMB review as an extension) for fixed facility incidents and the Department of Transportation (DOT) ("Hazardous Materials Incidents Reports" OMB # 2137-0039; expiration date 08/31/2014) for transportation incidents. A matching ratio for fixed facility incidents and a matching ratio for transportation incidents is calculated and is applied to the and NRC and DOT data in states that do not participate in NTSIP in order to estimate the number of NTSIP-qualifying incidents that would be expected. These estimates help non-participating states better understand the number and impact of NTSIP-qualifying incidents that occur in their states. Since the national database relies on existing information, OMB

approval is not required. This ICR is focused on one of the NTSIP components – state surveillance. The three main objectives of the NTSIP state surveillance are to:

1. Describe toxic substance releases and the public health consequences associated with such releases within participating states,
2. Identify and prioritize vulnerabilities in industry, transportation, and communities as they relate to toxic substance releases, and
3. Identify, develop, and promote strategies that could prevent ongoing and future exposures and resultant potential health effects from toxic substance releases.

Once approved, the NTSIP state surveillance system will be the only federal public health-based surveillance system to coordinate the collection, collation, analysis and reporting of the potential impact of acute toxic substance incidents on the health of the United States population. Basically there are three national federal sources of acute chemical incident data: the National Response Center (NRC), Environmental Protection Agency (EPA), and Department of Transportation (DOT). The NTSIP program will include all of these other datasets when it collates the incidents and then investigate them further to identify public health consequences. NTSIP is needed because of the limitations of the other federal databases. NRC data rely on the company or person responsible for the spill to report. Because they may obtain more than one call on the incident, they may have multiple reports and the data is often preliminary and incomplete. These agencies also have differing reporting criteria that do not cover all releases (e.g. DOT data is on commercial transportation incidents only, NRC incidents are incidents required to be reported under the Code of Federal Regulations, and EPA Risk Management Plan only includes incidents from covered facilities which are a small subset of all facilities that have chemical releases.) Additionally, these federal agencies focus on the release of hazardous substances, and the effects of these releases on the environment as end points, with a purpose of regulation and response. These data are not adequate to fully investigate the many risk factors associated with the human morbidity and mortality resulting from the release of hazardous substances. NTSIP actively gathers data from many varied sources (including NRC, DOT and environmental agencies) into one complete and comprehensive public health database. It is, therefore, necessary to continue and improve NTSIP which focuses on the public health, and not just the environmental impact, of toxic substance incidents. An incident will be captured in the surveillance system if it is a sudden, uncontrolled, or illegal release of at least one hazardous substance (i.e., a substance that might reasonably be expected to cause adverse human health outcomes) in a participating state. Upon OMB approval, the ATSDR will potentially include up to ten requesting states in the surveillance system.

This proposed information collection will actively gather data from many varied local, state and federal sources into one complete and comprehensive public health database. Such a database is needed to improve prevention and response to chemical incidents because without data on the magnitude, distribution and determinants of the problem, preparedness and prevention efforts are very limited and measuring of change is impossible. The NTSIP state surveillance data will be used by public health and safety

practitioners to develop evidence-based outreach, planning, and response efforts. Without this information collection the United States would not be prepared to prevent or respond to the numerous acute chemical incidents, lasting three days or less, that occur each year.

## 1.1 Privacy Impact Assessment

### Overview of the Data Collection System

**Attachment C** depicts the phases of data collection for this ICR. Upon OMB approval, the NTSIP coordinator, who may be either a federal employee assigned to the state or an employee of the state health department, will be responsible for collecting the data outlined on the State Data Collection Form (**Attachment D**). The form uses questions from the previously OMB approved HSEES data collection that has had many years of practical use and input from inside and outside stakeholders. Any changes were for practical data capture, at stakeholder request and with approval of all users. Also, based on an analysis of the HSEES data, questions that had a lot of missing entries were deleted. Data will be entered directly into the database via a web-based data entry system (**Attachment E**). The ATSDR will provide technical assistance to every participating state. At any given time, we anticipate as many as three of the ten states will have a NTSIP coordinator who will be a state health department employee. These coordinators will incur recordkeeping burden during the two phases of information collection.

During the first phase of the information collection, the NTSIP coordinators will rapidly learn about the incident and within 48 hours of the incident begin to enter information from a variety of existing data sources<sup>1</sup>. Examples of existing data sources include, but are not limited to, reports from the media, the NRC, the DOT Hazmat Intelligence Portal (HIP), state environmental agencies, state law enforcement agencies, and state spill hotlines. Since states vary in the way incidents are reported, the NTSIP coordinators will arrange for automatic notifications of chemical incidents. For example, the NTSIP coordinators will sign up to receive emails from the DOT HIP and NRC when an incident occurs. The NTSIP coordinators will also set up web media alerts to rapidly learn of incidents that don't meet NRC reporting criteria or are not reported properly or learn of details not in the original NRC report.. They will set up agreements with state environmental agencies to learn about and obtain information on incidents. Based on previous experiences with HSEES, it is expected that approximately 65% of the information will be obtained from existing data sources. However, because the timeliness, quality and quantity of existing data will vary by incident, we can not say which questions will be completed in this phase.

The second phase of the information collection will require the NTSIP coordinators to alert other entities of the incident and to request additional information on the incident

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<sup>1</sup> Recordkeeping burden does not apply to information collections conducted by federal employees. NTSIP coordinators who are federal employees already assigned to states are currently collecting information from existing data sources. These federal employees currently do not impose any reporting burden on the additional NTSIP respondents.

via interviews. Based on HSEES, approximately 35% of the information is expected to be obtained by the NTSIP coordinators through email or telephone interviews with additional types of respondents. These additional respondents will incur reporting burden and include, but are not limited to, the state health department coordinator, the on-scene commander of the incident, emergency government services (e.g., state divisions of emergency management, local emergency planning committees, fire departments, Hazmat units, police, and emergency medical services), the responsible party (i.e., the “spiller”), other state and local government agencies (e.g., departments of occupational safety, health, agriculture, and natural resources), hospitals, and local poison control centers.

The NTSIP coordinator will directly enter the data collected in each phase into the database via a free web-based data entry system that checks for inaccuracies and automatically completes additional fields to reduce burden. To ensure standardization of data collection across states, the NTSIP coordinators will be trained and receive a training manual (**Attachment F**).

When the NTSIP coordinator becomes aware of an incident, initial information may not be sufficient to decide whether it meets the NTSIP event eligibility criteria (**Attachment G**). After conducting the information collection, the NTSIP coordinator will confirm whether the incident qualifies for the NTSIP state surveillance system.

#### Items of Information to be Collected

This ICR will collect information related to the sudden, uncontrolled, or illegal releases of at least one hazardous substance. For the purposes of NTSIP, something is considered hazardous if it might reasonably be expected to cause an adverse human health outcome. The information collected will be on incidents and includes: the location of the incident, factors that contributed to the incident, type of industry involved, chemicals released, exposed/injured persons and their injuries, and evacuations. The State Data Collection Form (**Attachment D**) comprises 36 questions, that fall under 11 general categories (**Attachment H**).

No information in identifiable form (IIF) will be collected. Persons injured during the incident (i.e., “victims”) will never be interviewed; information on the victims of an incident will be collected from existing sources or from interviews with knowledgeable sources, such as first responders who will be at the scene or hospital personnel. The information collected about victims will be collected to assist in targeting prevention activities. Knowledge on the type of people being injured (e.g., youth or adult, responder, worker, student, public, types of PPE worn, etc.) helps to target outreach. For example, in 2004, “Georgia’s former Governor, Sonny Perdue, used findings from an HSEES article to show the adverse public health consequences to children as a result of chemical releases from meth labs. As a result, the state of Georgia passed a law stating that if a person is caught manufacturing meth in the presence of a child or children, they will be sentenced to prison time, even if they don’t have a prior record. First responders have also used data from NTSIP to determine that meth labs are

dangerous environments to enter. As a result, some police departments were able to successfully lobby for hazard pay. Additionally, some states—Michigan, Minnesota, and New York—have used NTSIP data on children’s exposure to mercury at schools to support legislation and outreach to have mercury removed from schools.

Although not considered IIF, the company name and address associated with an incident will be collected by the NTSIP coordinator. However, if an incident occurs in a private residence or vehicle, the location information is not collected. To ensure private addresses are not collected, a screener question will be used. A question in the event location section of the data collection form will first ask if the incident occurred in a private vehicle or residence. If it did, the rest of the location questions will be automatically skipped. If the event location is different from where the company is located (e.g., an exterminating company releases pesticide into an air handler at a department store), the name of the company responsible for causing the incident will be collected.

## **2. Purpose and Use of the Information Collection**

Based on experiences with HSEES, it is anticipated that the NTSIP surveillance information will be frequently used by a wide array of interested parties.

First, the NTSIP coordinator and local/state governments involved in response efforts will immediately use the information collected on an incident to inform their response. The NTSIP coordinator will alert other organizations of the existence of the incident and provide, when appropriate, any additional resources to aid the response. For example, the ATSDR may provide chemical fact sheets and Geographic Information System (GIS) maps to assist in the response.

We also expect that participating states will develop prevention plans based on the information collected, as done with earlier HSEES data. Some examples of past prevention activities through the HSEES system include creating fact sheets about the most frequently released chemicals or on chemicals that cause the most injuries, presenting data on a particular sector (e.g., chemical manufacturing) or affected population group (e.g., students) to targeted audiences, publishing scholarly articles, and developing state websites. States will work to enhance preparedness and response capabilities by using the data to identify vulnerabilities within the state to minimize the public health consequences of toxic substance releases.

Second, it is anticipated that the NTSIP data will be used by federal lawmakers and agencies. Lawmakers may use the information to support chemical safety legislation. Federal agencies, like the Chemical Safety Board and the Occupational Safety and Health Administration, used the HSEES information in their chemical safety reports. The Department of Homeland Security has expressed interest in using NTSIP information as part of an integrated chemical defense surveillance platform within the National



Biosurveillance Integration System (NBIS). In addition, the CDC's Division of State and Local Readiness State Public Health Emergency Preparedness (PHEP) programs may use NTSIP data when available to fulfill their program capabilities.

Third, research organizations, like the Mary Kay O'Connor Process Safety Center (MKOPSC) of the Texas A&M University and the RAND Corporation, may use this information in their chemical health and safety research, as was previously done with HSEES data.

Fourth, private industry, including the American Chemistry Council, is anticipated to use NTSIP information in their public health and safety programs. For example, the American Chemistry Council consulted with ATSDR for their pool chemical safety video and pool chemical safety posters.

As travel restrictions permit, the NTSIP data will be presented by the ATSDR at regional and national annual conferences, including the American Public Health Association, the Council of State and Territorial Epidemiologists, the National Environmental Health Association, and MKOPSC.

## 2.1 Privacy Impact Assessment

No IIF will be collected. There is no impact on individuals and minimal impact on businesses due to this data collection.

While not IIF, company name and street address will be collected. The ATSDR will never release surveillance information that contains the company name and street address. In general, the NTSIP surveillance data will not include zip code. Researchers may request that zip code, but, in doing so, the ATSDR requires the requesting researcher sign a data sharing agreement (**Attachment I**). By signing the agreement, researchers acknowledge that they will not attempt to identify the responsible party or the victims of an incident.

When a user enters an address in the system, they press a button for the computer to fill in the latitude and longitude. To do this the program makes a data call to the ATSDR GIS server. In addition, the user may press a button to retrieve from the GIS server whether there are sensitive populations (e.g., schools, nursing homes, hospitals, parks, daycare, etc.) within a quarter mile. This data layer comes from Homeland Security Infrastructure Program (HSIP) Gold ([https://www.hifldwg.org/public/HSIP%20Gold%20Freedom%20One%20Pager\\_July%202012.pdf](https://www.hifldwg.org/public/HSIP%20Gold%20Freedom%20One%20Pager_July%202012.pdf)). US census data on the GIS server is used to complete the population within a quarter mile variable when the user presses that button. The user can override the automatically generated data if they have better data. A quarter mile was chosen based on many years worth of HSEES data showing that the majority of incidents only affect ¼ mile or less. The company name, street address and geographic coordinates generated by the NTSIP system will be encrypted when transmitted to the ATSDR server and will only be available to the state that entered the information. States will have the option to unencrypt (make visible on

the ATSDR server) the location information, if that is consistent with state policy. If the event location is unencrypted, the ATSDR will be able to conduct geographic analysis and can better compare data with other federal agencies like the NCR and DOT.

See Section A.10 for information on the security of the NTSIP surveillance system.

### **3. Use of Improved Information Technology and Burden Reduction**

The data collection form was designed to collect the minimum information necessary for the goal of this program. The State Data Collection Form (**Attachment D**) is a more streamlined version of the HSEES form. All data is collected and entered directly in the database via a web-based system to save paper and time (**Attachment E**). Refer to Section B.4 for more information on how the HSEES form was adapted for this proposed use.

To decrease burden on data collectors and respondents, the NTSIP coordinators will attempt to get as much of the necessary information as possible from existing sources. Interviews will only be conducted to obtain the information that is unavailable from an existing source.

To preserve resources, the existing HSEES data entry screens were modified to reflect the new NTSIP data collection form. However, the old HSEES questions have been left on the data entry screens so that previous years' data can still be retrieved without the cost associated with maintaining two separate databases. When possible, the data system will automatically generate necessary information to decrease the burden on data entry staff. Validations exist so that out-of-range data cannot be entered.

The NTSIP coordinators will be able to incrementally complete records as additional data becomes available. Each incident is assigned a unique, sequential identification number which is generated when a new incident is entered. The data system has a variety of additional capabilities to increase functionality, including the ability to print a completed form, check for duplicates, query records, and print out summary reports.

### **4. Efforts to Identify Duplication and Use of Similar Information**

The ATSDR efforts to identify duplication of the proposed ICR included attendance at national meetings and consultations with states, other federal agencies, and research groups (**Attachment J**). Through these communications and the reliance of partners and stakeholders on the ATSDR's HSEES data, it has become evident that no other nationwide collection of chemical incidents exist that monitors the public health impact of chemical incidents like morbidity, mortality, hospitalization, decontamination, evacuation, and sheltering-in-place. There are other federal chemical incident databases, however, those databases do not cover all hazardous spills, do not require uniform reporting, are of varying quality and do not concentrate on the public health actions and impacts of the incidents. The data collected in these other databases are

not adequate to fully investigate the many risk factors associated with human morbidity and mortality resulting from the release of hazardous substances<sup>2</sup>. Literature searches and communication with other health professionals have revealed that there is no suitable replacement for this ICR. The information collected under this ICR will be of a continuing nature and facilitates a uniform collection of data from all participating states. Section A.8 contains more detailed information about outside consultations.

## **5. Impact on Small Businesses or Other Small Entities**

Small businesses will be contacted very infrequently and will only be contacted when:

1. The small business is the responsible party of a NTSIP-qualifying spill (the owner/operators of a facility, vehicle, or vessel), and
2. The necessary information cannot be collected through any existing or other data sources.

Based on the previous HSEES data, it is anticipated that only 15 incidents a year will require an interview with a small business. All efforts will be made to collect this information from other sources.

## **6. Consequences of Collecting the Information Less Frequently**

Incidents may occur at any given time, 24 hours a day, 7 days a week. The NTSIP coordinators will conduct the information collection as each incident occurs and will typically enter data within 48 hours of the incident. Rapid, continuous entering of incidents into the NTSIP surveillance system is necessary so that each incident can be monitored and responded to in a timely manner. Prompt notification of all chemical incidents allows the ATSDR to work with stakeholders to take measures to prevent or reduce the harm caused by the incidents.

If data were collected less frequently, the applicability of the information for emergency response would be greatly jeopardized. For example, in an effort to maintain the health of clean-up workers and residents following the Deepwater Horizon oil spill in Louisiana, Louisiana created seafood sampling and harvesting maps to ensure that harvested seafood was free of contaminants. Louisiana also maintained a database of self-reported worker symptoms of exposure during the remediation efforts. If approved, this ICR would help provide data that can be used in such emergencies. There are no legal obstacles to reducing the burden.

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<sup>2</sup> Binder, S. Deaths, injuries, and evacuations from acute hazardous materials releases. *American Journal of Public Health* 1989; 79:1042-1044.

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

There are no special circumstances with this information collection package. This request fully complies with the regulation 5 CFR 1320.5.

## 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 on December 31, 2013, Volume 78, Number 251, page 79696–79697 (**Attachment B**). No comments were received during the public comment period.

B. The previous HSEES system underwent an ATSDR external program peer review in 2005. Changes made in response to that review, along with a series of stakeholder meetings (**Attachment J**) ultimately led to the creation of this ICR. Efforts to consult with persons outside the agency are described in detail below.

In September 25-26, 2007, the MKOPSC held a roundtable meeting with stakeholders mainly from private industry. The objective of the roundtable was to discuss existing surveillance systems that capture hazardous substance events. In November 2007, a follow-up national meeting was held to discuss what an improved surveillance program would look like, concentrating on the limitations highlighted in the 2005 HSEES peer review and at the September MKOPSC meeting. Among the recommendations was that an expanded focus is necessary in order for the program to have more national impact on hazardous substances releases and their related public health consequences.

In July 2008, the ATSDR worked with the MKOPSC to compare information collected in HSEES with data collected by other sources, including poison control centers, Consumer Product Safety Commission, DOT Hazardous Materials Information System, National Response Center, and Environmental Protection Agency's Risk Management Plan Accident History. As part of this project, MKOPSC convened telephone workgroups to:

- 1) Review of incident definition and HSEES data fields,
- 2) Harmonize data fields among agencies,
- 3) Evaluate the cost benefit of removing petroleum exclusion including establishing appropriate threshold quantity,
- 4) Establish the statistical relationship of HSEES states, other states, and the entire US and what states are needed in a national system,
- 5) Evaluate whether low quantity releases cause injuries.

The outcomes of these work groups and recommendations were incorporated into a white paper<sup>3</sup>.

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<sup>3</sup> "Developing a Roadmap for the Future of National Hazardous Substances Incidents Surveillance"  
<http://pscfiles.tamu.edu/library/center-publications/white-papers-and-position-statements/Developing%20a%20Roadmap%20for%20the%20Future%20of%20National%20Hazardous%20Substances%20Incident%20Surveillance.pdf>.

In March 2012, the ATSDR met with the Department of Homeland Security (DHS) to explore an integrated chemical defense surveillance platform within the National Biosurveillance Integration System (NBIS) for (a) maintaining situational awareness of chemical exposures and events; and (b) information sharing of best practices, or issues related to chemical defense among various chemical defense subject matter experts within the public health and medical communities. Funding restrictions have delayed this integration, but the two databases identified by DHS as potential data sources for this were the National Poisoning Data System (NPDS) which can contain chemical exposure calls to poison control centers and the NTSIP surveillance system. The National Poisoning Data System (NPDS) has been examined in the past by NTSIP as a potential primary data source because of the potential for chemical exposure calls and was found to have too many smaller non-NTSIP-qualifying exposures and no identifiers to follow-up with to use. NPDS and NTSIP are two complementary, but non overlapping datasets This ICR will capture a different set of incidents with focus on larger exposures that require a public health action.

In October 2012, the ATSDR gave a presentation at the MKOPSC Annual symposium on the different chemical incident databases and what each database collected. This was attended by approximately 50 chemical safety engineers from public and private agencies and no new additional public or private databases were identified.

States that participated in HSEES have provided feedback and suggestions to improve the previous HSEES form and procedures for use in this ICR. For more information, refer to Section B.4.

## **9. Explanation of Any Payment or Gift to Respondents**

The ATSDR will not provide tokens of appreciation to respondents.

## **10. Assurance of Confidentiality Provided to Respondents**

### **10.1 Privacy Impact Assessment Information**

This submission has been reviewed by the NCEH/ATSDR OMB PRA Coordinator who has determined that the Privacy Act does not apply to this information collection.

The NTSIP has the FISMA-required Authority to Operate (ATO), valid until 07/11/2016, that meets the NIST 800-53 requirements. The ATO will be maintained as long as the NTSIP data collection continues.

The NTSIP will be hosted on the Secure Data Network (SDN). The SDN is certified as a HHS Level 5 Secure Facility, Servers will be constantly staffed, monitored, and kept in a locked and environmentally-controlled room, accessible only with a validated and current keycard. The SDN Web Server is located outside of the CDC internal network and the NTSIP database will be located within the CDC Internal Network and

maintained by CDC Information Technology Services Office under the Moderate Enterprise Master System Security Plan. The SDN Certificate and GIS Web servers will be located within the CDC Internal Network. Users will access the NTSIP database through the SDN Web Server, which requires a digital certificate and a passphrase for authentication. Certificate applications must be approved before a certificate is issued. Each user is assigned a unique numeric token during registration. Once users have logged onto the SDN Web Server, they can access the NTSIP application.

Company name and address will be kept in the production database inside the CDC Internal Network. As an additional layer of security, the data will be encrypted inside the SQL database, using AES-256 Standards, which meets CDC and HHS requirements.

Participation is voluntary; a state may request a NTSIP coordinator (a CDC Public Health Associate) to help collect the data. To help states elicit cooperation from incident reporters and responsible companies, the NTSIP data entry system will encrypt the names and street address of the responsible company when it is transferred to the ATSDR. If a state should decide that their state policy allows them to release such information, they will unencrypt the information so that the GIS analysis can be performed and other federal agencies alerted. However, the ATSDR will never release company name and address.

All records are subject to the ATSDR Comprehensive Record Control Schedule (CRCS), B-371, which contains authorized disposition instructions for the ATSDR's administrative and program records. The ATSDR is legally required to maintain its program-related records in accordance with disposition instructions contained in this comprehensive records control schedule. These retention periods have a direct impact on completing Freedom of Information Act requests. States will be required to store any supporting materials relating to the incident for three years in secure files.

#### IRB Approval

The NCEH/ATSDR Human Subjects Coordinator has reviewed this information collection and determined that this project is research not involving human subjects. IRB approval is not required and a copy of the NCEH/ATSDR research determination can be found in **Appendix K**. Informed consent is not necessary as states do not collect data from individuals, but rather on incidents.

### **11. Justification for Sensitive Questions**

No information will be collected of a personal or sensitive nature.

### **12. Estimates of Annualized Burden Hours and Costs**

A. For three states, the NTSIP coordinators are state employees and will incur recordkeeping burden. The additional respondents will incur reporting burden.

Table A-12-1 shows the estimated annualized burden hours. The estimates are derived from 2010 HSEES data, in which 2,981 incidents were reported by seven states.

**Table A-12-1: Estimated Annualized Burden Hours**

Type of Respondents	Form Name	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hrs.)	Total Burden (in hrs.)
State NTSIP Coordinators	NTSIP State Data Collection Form	3	426	1	1,278
On-scene commanders	NTSIP State Data Collection Form	110	1	30/60	55
Emergency government services	NTSIP State Data Collection Form	810	1	30/60	405
Responsible party	NTSIP State Data Collection Form	15	1	30/60	8
Other state and local governments	NTSIP State Data Collection Form	60	1	30/60	30
Hospitals	NTSIP State Data Collection Form	10	1	30/60	5
Poison Control Centers	NTSIP State Data Collection Form	80	1	30/60	40
Total					1,821

B. Table A-12-2 shows the estimated annualized burden costs. Estimates come from the Department of Labor National Compensation Survey Occupational earnings tables, United States, December 2009-January 2011 ([http://www.bls.gov/ncs/ncswage2010.htm#Wage\\_Tables](http://www.bls.gov/ncs/ncswage2010.htm#Wage_Tables)).

**Table A-12-2: Estimated Annualized Burden Costs**

Type of Respondents	Form Name	Total Burden Hours	Hourly Wage Rate	Total Respondent Cost
State NTSIP Coordinator	NTSIP State Data Collection Form	1,278	\$32.62	\$41,688
On-scene commanders	NTSIP State Data Collection Form	55	\$28.33	\$1,558
Emergency government services	NTSIP State Data Collection Form	405	\$20.98	\$8,497
Responsible party	NTSIP State Data Collection Form	8	\$22.02	\$176
Other state and local governments	NTSIP State Data Collection Form	30	\$32.10	\$963
Hospitals	NTSIP State Data Collection Form	5	\$16.83	\$84
Poison Control Centers	NTSIP State Data Collection Form	40	\$16.83	\$673
Total				\$53,639

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

There will be no direct costs to the respondents or record keepers.

### 14. Annualized Cost to the Government

The total estimated annualized cost to the federal government is \$770,212. Table A-14 contains a detailed breakdown of the costs per year.

- Personnel: \$674,633 per year.
- Contract: \$78,029 per year. The contract supports a Systems Analyst at half-time who maintains and upgrades the web-based data entry system.
- Travel: \$5,200 per year. To promote the use of the NTSIP data, ATSDR staff will present data at several regional and national conferences, including the annual meeting of the American Public Health Association, Council of State and Territorial Epidemiologists, the National Environmental Health Association, and MKOPSC). Attendance for one person at each of these four conferences is approximately \$1,300 per conference.
- Software: \$12,350 per year. SAS licenses are needed to analyze the data; the ATSDR supports 10 licenses (5 ATSDR staff and 5 state-assigned staff).



**Table A-14:** Estimated Annualized Cost to the Federal Government

<b>Staff (FTEs)</b>	<b>Average Annual Hours</b>	<b>Average Hourly Rate</b>	<b>Average Annual Cost</b>
Personnel			
10 Public Health Associates (GS 7/9)	3,195	\$21.01	\$67,127
1 Program Coordinator Epidemiologist (GS 14)	2,080	\$78.27	\$162,802
3 Technical advisors (GS 12–14)	6,240	\$49.85	\$311,064
1 Statistician (GS 13)	2,080	\$64.25	\$133,640
Contract			\$78,029
Travel			\$5,200
Software			\$12,350
<b>Estimated Total Cost</b>			<b>\$770,212</b>

**15. Explanation for Program Changes or Adjustments**

This is a new information collection.

**16. Plans for Tabulation and Publication and Program Time Schedule**

This information collection would begin immediately following OMB approval and will be an ongoing surveillance activity for the three years.

Participating states will have 15 ½ months to finalize data from the previous calendar year. After the data are finalized, the ATSDR will analyze the data. The NTSIP annual reports and a public use dataset will be placed on the NTSIP website for access by interested state, local, and private parties. Special requests for NTSIP surveillance information can be made by interested parties and the timelines of such requests cannot be anticipated. National or international presentations and journal articles on specific topics will be produced dependent upon the results of the annual report and special requests.

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

The OMB Control Number and expiration date will be displayed on all data collection forms as required.

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

There are no exceptions to the certification.