

SUPPORTING STATEMENT – PART A

Risk Management Information (RMI)

A. JUSTIFICATION

1. Need for the Information Collection

Information collection is required to track and maintain records on injuries/fatalities, occupational illnesses and pertinent information for property damage occurring during Naval operations. The authority to collect this information is granted by the following laws and policies: 5 U.S.C. 41 4101-4118, the Government Employees Training Act of 1958; 5 U.S.C. §301, Departmental Regulations; 10 U.S.C. §5013, Secretary of the Navy; 10 U.S.C. §5041, Headquarters, Marine Corps; E.O. 12196, Occupational Safety and Health Programs for Federal Employees; DoD Instruction 6055.07, Mishap Notification, Investigation, Reporting, and Record Keeping; OPNAVINST 5102.1D/MCO P5102.1B, Navy & Marine Corps Mishap and Safety Investigation, Reporting, and Record Keeping Manual; OPNAVINST 3750.6S, Naval Aviation Safety Management System; DoD 6025.18-R, DoD Health Information Privacy Regulation, and E.O. 9397 (SSN), as amended.

2. Use of the Information

The data maintained in this system will be used for analytical purposes to improve the Department of the Navy's accident prevention policies, procedures, standards and operations, as well as to ensure internal data quality assurance

Primary purpose of the system is to improve the safety of the Department of the Navy's operating environments to significantly reduce the number of mishaps, injuries and occupational illnesses. The information is a management tool to track and inform designated government personnel of incident, injuries and occupational illnesses, causal factors and mitigation strategies. Incidentally, less than one-tenth of one percent of the information may be gathered from personnel identified as "public" who may either be involved or witnessed the mishap, as indicated in military police reports, military medical facility reports, and DON facility access control offices. A mishap investigator may be required to conduct interviews with members of the public who witnessed or who are involved with the mishap. Respondents are requested to provide statement on the OPNAV 5102/10 Safety Investigation Report Advice

to Witness. Mishap Investigators will either interview the public member face-to-face or by email. At the start of the interview the investigator will supply the interviewee with OPNAV 5102/10 and explain the difference of confidential reporting and not privileged reporting, during the investigation the investigator will ask a series of verbal question. After the interview the interviewee will use the OPNAV 5102/10 to write down their statement on the mishap. In a few cases interviews have to be done via the telephone. During the telephones interview the investigator will explain the difference of confidential reporting and not privileged reporting, then ask a series of questions regarding the mishap, writing down the answers. All data is inputted to the RMI system. This information may be used to update the data records in the RMI system and/or entered as an electronic record. Depending on the type of Mishap, OSHA Form 301 may also be used. The OHSA Form 301 data collection is covered under OMB 1218-0176. The user Intelx operating platform/interface requires CAC enabled login to access RMI. RMI login displays the OMB, Agency Disclosure Notice, and FOUO Statement. The members of the public do not enter any data into RMI. Only authorized safety personnel shall have access to personally identifiable information as required to comply with OSHA reporting requirements or to improve preventative safety measures through investigations of mishap, injury or occupational illnesses.

This system will track and maintain safety training records to ensure all applicable personnel receive required safety, fire, security, force protection, and emergency management training courses necessary to perform assigned duties and comply with Federal, DoD, and Navy related regulations.

The Dive Jump Reporting System (DJRS) module of RMI collects on-duty dive and jump exposure data for DOD Service Agencies that allows for analysis to identify trends in personnel and equipment performance and procedural adequacy. It also serves as the source for generating official dive or jump logs for an individual or command.

### 3. Use of Information Technology

The RMI system is a web-enabled solution and shall serve as the Department of the Navy's authoritative system for safety and risk management for Safety professionals and employees.

Access to RMI requires a valid DoD Public Key Infrastructure (PKI) certificate and is PKI enforced. Roles and permissions are granted based on need to know, in accordance with Navy governing policies. Computer terminals are located in limited access areas. Approximately 99.9% of information will be collected and managed electronically. Paper case records are maintained in locked security containers (Note: As RMI is more widely used the need for paper case files will significantly decrease or be eliminated). Work areas are sight controlled during normal work hours.

4. Non-duplication

There is not an information collection already available which can be used, or modified for used for the purposes of this collection.

5. Burden on Small Business

Not Applicable; no burden on small businesses

6. Less Frequent Collection

Not Applicable; collection is not periodic.

7. Paperwork Reduction Act Guidelines

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

A 60-day notice for the proposed collection was posted in the Federal Register from 9/2/2015 to 11/2/2015, Docket ID: USN-2015-HQ-0013, 80 FR 53143. No comments were received from the public and no external consultation was required.

A 30-day notice was published in the Federal Register on 5/19/2016, 81 FR 31618.

9. Gifts or Payment

Not Applicable; no gifts or payments are associated with the collection.

## 10. Confidentiality

Access to RMI requires a valid DoD Public Key Infrastructure (PKI) certificate and is PKI enforced. Computer terminals are located in limited access areas and are handled by personnel that are properly trained in working with automated Privacy Act systems of records. Paper records are being safeguarded in locked enclosures within protected spaces. SORN ID # NM03750-1 entitled "Risk Management Information (RMI)". A draft of SORN NM03750-1 has been submitted to the DoD Privacy Office via the DON Privacy Office.

The DRAFT Privacy Impact Assessment (PIA) for RMI was provided to the DON CIO for submission to DoD.

Both the OPNAV 5102/10 and the RMI system display the FOUO Privacy Statement "FOR OFFICIAL USE ONLY - PRIVACY ACT SENSITIVE: Any misuse or unauthorized disclosure of this information may result in both criminal and civil penalties"

According to Public Law 91-596 and 29 CFR 1904, OSHA's recordkeeping rule, information shall be kept on file for not less than 5 years following the year to which it pertains. In accordance with OPNAVINST 3750.6S, records are permanent and shall be held indefinitely.

## 11. Sensitive Questions

Based on the type and severity of mishap, injuries, or occupational illnesses, questions may be asked about gender, injury specifics, and factors related to sleep/fatigue and/or alcohol/drugs.

RMI will replace the Legacy System, Web Enabled Safety System (WESS). SSN is only contained in RMI when it is transferred from the Legacy system that has already collected SSN. Unique identifiers in RIM are assigned to data collected from the public.

## 12. Respondent Burden, and its Labor Costs

### a. Estimation of Respondent Burden

(1) OPNAV 5102/10 Burden

ANNUAL BURDEN HOURS: 12.5 Hours

NUMBER OF RESPONDENTS: 25

RESPONSES PER RESPONDENT: 1

AVERAGE BURDEN PER RESPONSE: .5 hour

FREQUENCY: On occasion

(2) Verbal Question Burden

ANNUAL BURDEN HOURS: 25 Hours

NUMBER OF RESPONDENTS: 25

RESPONSES PER RESPONDENT: 1

AVERAGE BURDEN PER RESPONSE: 1 hour

FREQUENCY: On occasion

(3) Total Burden

ANNUAL BURDEN HOURS: 37.5 Hours

NUMBER OF RESPONDENTS: 25

RESPONSES PER RESPONDENT: 1

AVERAGE BURDEN PER RESPONSE: 1.5 hours

FREQUENCY: On occasion

b. Labor Cost of Respondent Burden

ANNUAL LABOR COST: 37.5 (Annual burden for total number of respondents) \* \$26.69 (Hourly Rate) = \$1,000.88 (Based on Bureau of Labor Statistics' First-Line Supervisor of Production and Operating Workers Labor rate <http://www.bls.gov/oes/current/oes511011.htm>)

13. Respondent Costs Other Than Burden Hour Costs Not applicable; there are no costs other than burden hours.

14. Cost to the Federal Government

Labor Cost to the Federal Government			
	Collection Instrument #1	Collection Instrument #2	Total
Number of Responses	25	25	25
Processing Time Per Response (in hours)	.5 hour	1 hour	1.5 hour
Hourly Wage of Worker(s) Processing Responses	21.30 - based on pay average for an E-6 <a href="http://www.dfas.mil/militarymembers/payentitlements/military-pay-charts.html">http://www.dfas.mil/militarymembers/payentitlements/military-pay-charts.html</a>	21.30 - based on pay average for an E-6 <a href="http://www.dfas.mil/militarymembers/payentitlements/military-pay-charts.html">http://www.dfas.mil/militarymembers/payentitlements/military-pay-charts.html</a>	21.30 - based on pay average for an E-6 <a href="http://www.dfas.mil/militarymembers/payentitlements/military-pay-charts.html">http://www.dfas.mil/militarymembers/payentitlements/military-pay-charts.html</a>
Cost to Process Each Response (Processing)	\$10.65	\$21.30	\$31.95

Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)			
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses	\$266.25	\$532.50	\$798.75

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
					\$1.680M (OM)	\$1.680M

			\$1.392M (OP)			\$1.392M
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Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$3.072M	\$799.00	\$3,072,799.00

15. Reasons for Change in Burden

Not Applicable; This is a new collection

16. Publication of Results

Not applicable; the results of the information collection will not be published.

17. Non-Display of OMB Expiration Date

Not applicable; the OMB expiration date will be displayed

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions are necessary.