

SUPPORTING STATEMENT - PART A

Risk Management Information (RMI) System – 0703-0065

Summary of Changes

- Social Security Numbers (SSN) are no longer collected. Investigators will not ask respondents to provide SSN for collection purposes. Legacy System(s) data retrieved and migrated into RMI is cleansed of SSNs and replaced with unique identifiers not protected under the privacy act.

1. Need for the Information Collection

This 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. The 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 Risk Management Information (RMI) System is a management tool to track and inform designated government personnel of incident, injuries and occupational illnesses, causal factors and mitigation strategies. 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. The Navy uses the RMI system to collect the required data for safety incident. The RMI is accessible to authorized safety personnel at <https://afsas.safety.af.mil>.

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 form, 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. Additionally, during the investigation the investigator will ask a series of verbal questions. 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 conducted via telephone. All data is entered into the RMI system.

This information collected 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 OSHA Form 301 data collection is covered under OMB 1218-0176. The user operating 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.

The RMI 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.

3. Use of Information Technology

Approximately 50% 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 in a government facility.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Collection occurs on occasion, when there is a mishap.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Wednesday, May 22, 2019. The 60-Day FRN citation is 84 FRN 23538.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, July 26, 2019. The 30-Day FRN citation is 84 FRN 36093.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is required and is listed on OPNAV Form OPNAV 5102/10.

A Systems of Record Notice is required, SORN, NM03750-1 entitled "Risk Management Information (RMI)". A draft of SORN NM03750-1, "Risk Management Information (RMI)" has been provided with this package for OMB's review.

A Privacy Impact Assessment is required (PIA). A draft copy of the PIA, RMI, has been provided with this package for OMB's review.

Retention and Disposal:

Records are permanent and are transferred to the Washington National Record Center when 4 years old and then transferred to the National Archives and Records Administration when 20 years old maintained indefinitely by the Naval Safety Center.

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.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1. OPNAV 5102/10

- a. Number of Respondents: 25
- b. Number of Responses per Respondent: 1
- c. Number of Total Annual Responses: 25
- d. Response Time: .5 hour
- e. Respondent Burden Hours: 12.5 hours

2. Interview Questions

- a. Number of Respondents: 25
- b. Number of Responses per Respondent: 1
- c. Number of Total Annual Responses: 25
- d. Response Time: 1 hour
- e. Respondent Burden Hours: 25 hours

3. Total Submission Burden

- a. Total Number of Respondents: 25
- b. Total Number of Annual Responses: 25
- c. Total Respondent Burden Hours: 37.5 hours

b. Labor Cost of Respondent Burden

1. OPNAV 5102/10

- a. Number of Total Annual Responses: 25
- b. Response Time: .5 Hour
- c. Respondent Hourly Wage: \$29.05
- d. Labor Burden per Response: \$14.53
- e. Total Labor Burden: \$363.125

2. Interview Questions

- a. Number of Total Annual Responses: 25
- b. Response Time: 1 Hour
- c. Respondent Hourly Wage: \$29.05
- d. Labor Burden per Response: \$29.05
- e. Total Labor Burden: \$1089.375

2. Overall Labor Burden

- a. Total Number of Annual Responses: 50
- b. Total Labor Burden: \$907.87

* The Respondent hourly wage is now \$29.05 (hourly rate)
<https://www.bls.gov/oes/current/oes511011.htm>

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

1. OPNAV 5102/10

- a. Number of Total Annual Responses: 25
- b. Processing Time per Response: .5 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$21.94
- d. Cost to Process Each Response: \$10.97
- e. Total Cost to Process Responses: \$274.25

2. Interview Questions

- a. Number of Total Annual Responses: 25
- b. Processing Time per Response: 1 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$21.94
- d. Cost to Process Each Response: \$21.94
- e. Total Cost to Process Responses: \$548.50

3. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 50
- b. Total Labor Burden: \$822.75

* The hourly for government workers is an E6 with 10 years of service.
<https://www.dfas.mil/militarymembers/payentitlements/Pay-Tables/Basic-Pay/EM.html>

b. Operational and Maintenance Costs

- a. Equipment: \$ NSP (not separately priced)
- b. Printing: \$ NSP
- c. Postage: \$ NSP
- d. Software Purchases: \$ NSP
- e. Licensing Costs: \$ NSP
- f. Other: \$ 4,800,000.00
- g. Total: \$ 4, 800,000.00

- 1. Total Operational and Maintenance Costs: \$ 4,800,000.00
- 2. Total Labor Cost to the Federal Government: \$822.72
- 3. Total Cost to the Federal Government: \$4,800,822.75

15. Reasons for Change in Burden

There has been no change in burden since the last approval.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.