

**SUPPORTING STATEMENT A  
FOR PAPERWORK REDUCTION ACT STATEMENT SUBMISSION**

National Park Service (NPS) Office of Public Health (OPH)  
Disease Reporting and Surveillance Forms  
**OMB Control Number 1024-New**

**Terms of Clearance:** None

**Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

This is a request to approve a collection currently in use without a valid OMB control number. The Disease Reporting and Surveillance System (DRSS) has been in operation in Yellowstone National Park (YELL) since 2008. As a part of this request, we would like to request approval to use two new forms ("*Concession/Partner Employee Illness Report*" and "*Tour Vehicle Passenger Illness Report*") at three parks to include Yellowstone, Grand Teton (GRTE) and Glacier (GLAC) National Parks because visitors tend to visit these three parks in succession during a single trip. The surveillance and monitoring efforts in one park may help reduce the risk of disease transmission to other parks within the system.

Each year, the National Park Service (NPS) Office of Public Health (OPH) responds to multiple incidents, service-wide, involving human disease transmission within the park system. Many of these incidents involve the spread of gastrointestinal illness and that may be attributable to norovirus, which is a common and highly contagious virus spread through contaminated food or water, from person-to-person, or by contaminated surfaces, etc. In the event of illness incidents, public health responders also consider and investigate the possibility of other etiological agents. By utilizing DRSS, which provides information on the symptoms, duration, and location of illness, public health workers are able to work rapidly and appropriately to address the incidents.

The need for a real-time system to detect illness transmission became apparent after 2004, when a large norovirus outbreak occurred at Yellowstone National Park that affected employees and visitors. The illness spread quickly by multiple busloads of visitors entering and exiting the park and by person-to-person spread in employee dormitories. Controlling the outbreak was challenging, given the size of the park, the lack of cell phone coverage, and the different concessionaires scattered throughout the park. Based on this experience, the NPS OPH conducted a review to

determine how such an event could be managed better in the future.

As a result of this review, in 2008, the NPS OPH developed the “Disease Reporting and Surveillance System” (DRSS) to enhance surveillance, estimate the burden of illnesses, and improve knowledge about where these outbreaks were occurring within the park. DRSS is used to document concessionaire employees’ illnesses as well as illnesses occurring on tour buses through an on-line, real-time reporting system that allows concession management, the park, and the OPH to detect an increase in illness reports that may suggest the beginning of an outbreak. By identifying and responding early to small increases in illness reports, the park is able to be proactive in preventing larger, more extensive outbreaks.

The DRSS will use Epi Info™ as an electronic platform to consolidate and analyze the data collected using the two new proposed forms for this information collection. This software is developed and maintained by the Centers for Disease Control and Prevention (CDC) and is used worldwide for the rapid assessment of disease outbreaks and for the development of small to mid-sized disease surveillance systems. Epi Info™ will allow the NPS to enter and analyze data to create epidemiologic reports that will include real-time statistics, tables, graphs, and maps.

The NPS Organic Act of 1916 (Organic Act) (54 U.S.C. §100101 et seq.) and the Public Health Service Act (42 U.S. Code Chapter 6A) gives the NPS broad authority to regulate the use of the park areas under its jurisdiction. The OPH is an internal agency-specific public health capability, managed, funded and operated by NPS that works to protect and promote visitor health across the National Parks. United States Public Health Service Commissioned Corps officers on detail to the agency primarily staff the OPH (NPS Management Policy 2006, 8.2.5.5). The DRSS is a joint effort of concession management and the NPS Office of Public Health.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

This ICR is for the approval of two forms currently in use without OMB clearance: The “*Concession/Partner Employee Illness Report*” and “*Tour Vehicle Passenger Illness Report*.” Concessionaires and OPH use the information in these forms to monitor Individual reports of illnesses of employees and tour bus visitors who report being sick, as well as the symptoms they are

experiencing when they enter the park. This information is a means to detect disease emergence and potential clusters of outbreaks that need monitoring. Reported illnesses allows for early detection and enables concessionaires and OPH to develop rapid disease response protocols and control activities. Concessionaires will use the “*Concession/Partner Employee Illness Report*” to record information about an employee reported illness. The questions on the form provides the following information:

Information Collected	Purpose and Use
<b>Symptoms</b>	This information will help concessionaires determine and track potential outbreaks or health trends to inform appropriate public health interventions needed to prevent spread of illness to staff and visitors
<b>Timing and duration of illness</b>	This information will help predict any cyclic occurrences of infectious illnesses.
<b>Location of the sick employee</b>	This information will allow OPH to direct public health interventions to the appropriate facilities and geographical areas of the park.
<b>Current status of the employee</b>	This information will be used as a measure to isolate infections

Upon check-in, concession employees at lodgings will use the “*Tour Vehicle Passenger Illness Report*” to record information about sick visitors entering the park in commercial or tour vehicles. The questions on the form will provide the following information:

Information Collected	Purpose and Use
Number of sick people in a vehicle	Responses to this question will be used to understand the extent of the outbreak
Symptoms	Responses will inform appropriate public health interventions to prevent spread of illness to staff and other visitors
Timing and duration of illness	This information will help determine the potential for the infection to spread illness to other people
Travel history of the vehicle	This information will help estimate the source and origin of the disease. It will also provide data to the appropriate local or state health departments to guide and enact public health measures.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

Both forms are fillable-filable using an electronic format. This will provide for easy data entry, database construction and data analyses with epidemiologic statistics, maps, and graphs for public health professionals. All data will be securely stored on third party a server provided by the CDC through the Council for State and Territorial Epidemiologists that is accessible by OPH who use the data to provide summaries of relevant data to the concession staff responsible taking appropriate actions to any outbreaks within the park.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no duplication in effort. The Information is collected is a centralized, unique, integrated source used for early detection of infections for the specific site. No other Federal agency or NPS program collects this type of information in parks.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

There is no any additional burden or impacts on small businesses. The processing time is de minimis because this information is considered part of regular and routine duties.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Failure to collect this information will impede our abilities to monitor disease trends and will leave park programs and park concessioners (lodging, restaurants, general stores, and snack bars) at risk for potential disease outbreaks that grow quickly. The timeliness of information is one of the most critical factors in the rapid response process. Using this data to monitor the occurrence to prevent the spread of diseases throughout the park will be a part of an early warning and response system.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- \* requiring respondents to report information to the agency more often than quarterly;**

- \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- \* requiring respondents to submit more than an original and two copies of any document;
- \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- \* in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- \* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- \* requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Given the nature of illness and outbreaks, respondents are requested to report any illnesses that have caused concession employees to miss work or any illness that are observed on the tour buses. There are no other special circumstances.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On December 15, 2016, we published in the *Federal Register* notice (81 FR 90867) of our intent to request that OMB approve this information collection. In that Notice, we solicited comments for 60 days, ending on February 13, 2017. We received one comment on 12/30/2016, from Lisa Schnall, Senior Attorney Advisor with the Office of Legal Counsel, U.S. Equal Employment Opportunity Commission, requesting a copy of the form(s) and supporting statement. Ms. Schnall was included as one of the outside reviewers.

In addition to the Federal Register Notice, nine individuals familiar with DRSS were asked to review the two forms and to provide feedback. After two weeks, we received and responded to the following comments:

**Comment 1:** *Concession Employee Illness Report*

One respondent noted that “we don’t use the term furlough, we use the terms of quarantine and sick leave. Furlough connotes a longer period of time.”

**NPS Response:** In Question 12 and 13 the word “furlough” will be replaced with the appropriate term “sick leave.”

**Comment 2 -** *Tour Vehicle Passenger Illness Report.*

One respondent thought that question #6 (“What is the company (owner) of the tour bus or vehicle company?”) might be difficult to obtain. Another respondent noted that with question #7, they would not need “ship” as one of the possible answers.

**NPS Response:** - Question #6 will not be changed. It is important to understand which buses might be experiencing outbreaks and communicate potential disease outbreaks to the bus companies. As with all of the other questions, this information is voluntary. Regarding question #7, only vehicles present in the park will be included in the survey.

**Comment 3 -** *Concession Employee Illness Report:*

One suggestion was to use fill in the blanks for questions 7-10 due to the many options.

**NPS Response** - We will retain the use of multiple choice questions in questions 7-10 in order to ensure consistency across forms.

**Comment 4 -** *Tour Vehicle Passenger Illness Report:*

Some respondents thought that this form might take longer than the estimated 5 minutes time to collect the information required.

**NPS Response** - The form previously stated that the form would take less than 5 minutes. We updated the estimated burden to approximately 30 minutes.

**Comment 5 -** *Tour Vehicle Passenger Illness Report:*

Another respondent suggested that Questions 4-6 would be better as fill in the blank rather than a drop down menu with predetermined responses, because there are over 20+ tour companies.

**NPS Response** - We will not make any changes to this section. With regard to the question about Questions 4-6, in order to maintain consistency, we will maintain the drop-down menus.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts are provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

We do not provide any assurance of confidentiality. Information is collected and protected in accordance with the Freedom of Information Act (5 U.S.C. 552) (FOIA). This collection will not collect or store any personal identifiable information. No personally identifiable information (name or telephone number) will appear in the context of the results nor in any of our reports or findings. The *Concession Employee Illness Report* will report information on the numbers ill, the symptoms, and status of the employee. The *Tour Vehicle Passenger Illness Report* will report information on the numbers ill, the symptoms, and the origin and destination of the tour buses.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

We do not ask questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- \* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- \* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

This will be an on-going collection consisting of two forms. We anticipate receiving at least 390 *Concession Employee Illness* and 90 *Tour Vehicle Passenger Illness Report* (30 per park) each year. The combined annual respondent burden for this collection is 73 hours. We have estimated respondent burden as follows:

- ❖ *Concession Employee Illness Form*: (50 hours). Less than one minute will be used to make initial contact with the employee and the remaining time will be use to complete the form. (10 minutes x 300 respondents = 50 hours).
- ❖ *Tour Vehicle Passenger Illness Form*: (23 hours). We estimate that there will be at least 30 completed forms each year. It will take the staff about 30 minutes to collect this information (time to explain the purpose of the collection, answer any questions, and record the responses in the electronic form). 15 minutes x 90 respondents = 23 hours.

**Table 1: Estimated Annual Respondent Burden**

Reporting Form	Number of Responses	Estimated Burden per respondent (minutes)	Total Annual Burden (hours)
<i>Concession Employee Illness</i>	300	10	50
<i>Tour Vehicle Passenger Illness</i>	90	15	23
Total	390		73

\*\*30 forms per park (YELL, GLAC, GRTE)

We estimate the total annual dollar value of this collection to be \$2,536 (Table 2). This estimated value includes the multiplier for benefits based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics Occupation and Wages, for civilian workers (see: BLS news release USDL-19-1499 for Employer Costs for Employee Compensation - Table 1) — December 2018 at - <http://www.bls.gov/news.release/pdf/ecec.pdf> - released, March 19, 2019). We multiplied the estimated burden hours by to estimate the costs of \$36.22 for tour vehicle passengers (civilian workers) and \$34.05 for Concession Employee (private industry).

**Table 2: Estimated Dollar Value of Annual Respondent Burden**

Reporting Form	Total Annual Burden (hours)	Total Compensation (including benefits)	Total Annual cost of burden
<i>Concession Employee Illness</i>	50	\$34.05	\$1,703
<i>Tour Vehicle Passenger Illness</i>	23	\$36.22	\$833
Total	65		00

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and



maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

We have not identified any non-hour cost burden costs.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

We estimate the total annual cost to the Federal Government for this collection to be \$17,405. Table 3 below shows Federal staff and grade levels the tasks associated with this information collection.

We used the Office of Personnel Management Salary Table [2019-DCB](#)<sup>1</sup> to determine the hourly rates for NPS Epidemiologist and Public Health Consultant; and Table [2019-RUS](#)<sup>2</sup> and multiplied the hourly rate by 1.6<sup>3</sup> to account for benefits.

**Table 3. Federal Employee Salaries and Benefits**

Position	GS Level	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly rate)	Estimated time (hours)	Total Annual Cost
NPS Epidemiologist (DCB)	14/5	\$62.64	\$100.22	52	\$5,211
NPS Public Health Consultant (RUS)	14/5	\$56.92	\$91.07	52	\$4,736
					0

<sup>1</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/DCB_h.aspx)

<sup>2</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS_h.aspx)

<sup>3</sup>

We estimate the total annual dollar value for at all non-federal employee collecting this information for each form at each park (YELL, GRTE and GLAC) to be \$7,458. We used the total compensation of \$34.05 to estimate time for cost per hour worked by private industry workers. This estimate includes the benefit costs used in the aforementioned Bureau of Labor Statistics news release (see Table 2: Operational group: Office and administrative support).

**Table 4. Non-Federal Employee and Operational Expenses**

Reporting Form	Number of Employees	Total Annual Hours	Total Compensation (including benefits)	Total Annual Cost
<i>Concession Employee Illness</i>	3	50	\$34.05	\$5,108
<i>Tour Vehicle Passenger Illness</i>	3	23	\$34.05	\$2,350
				\$0

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

This is a new collection.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The data from this collection will not be published.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We will display the OMB control number and expiration date on the form and on the opening page of the web-based information system.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions to the certification statement.