

## **Support Statement for Information Collection Requirements**

**Title of Information Collection:** NASA Safety Reporting System

**Form names and numbers:** OMB Control Number 2700-0063

**Type of Action:** Extension without Change

**OMB Control Number:** 2700-0063

### **Part A. Justification**

#### **1. Need for the Information Collection:**

Authority for creation of the NASA Safety Reporting System (NSRS) is found in the Space Act, 42 U.S.C. 2451-2476. In addition, NPR 8715.3/*NASA General Safety Program Requirements* directs the Chief, Safety and Mission Assurance to implement a backup safety notification system.

The safety notification is designed to afford individual NASA and contractor employees with a mechanism to alert NASA Headquarters to potential safety concerns that have not been resolved adequately through normal, local safety reporting processes. This information collection focuses on information collected by individuals who are not civil service employees.

Creation of a strengthened safety office was also one of the major recommendations of the Presidential Commission which investigated the Challenger accident, and implementation of the NSRS is one manifestation of NASA's commitment to meeting the Commission's recommendation.

OMB has approved previous instances of this information collection under Control Number 2700-0063. The current approval expires 10/31/2019; this ICR renewal seeks to extend the collection an additional three years. No changes have been made to the collection instrument since its previous approval in 2016.

#### **2. Use of this Information:**

The NASA Safety Reporting System (NSRS) was established to provide a fast response hazard identification and reporting system, which aids in the elimination of unsafe conditions and the prevention of accidents. In addition, the NSRS serves as a mechanism for elevating problems to selected upper management when standard channels fail. The

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NSRS is a voluntary, anonymous, and non-punitive supplement to formal safety reporting procedures and is administered by an independent agent, ARES Corporation of McLean Virginia. The only means of reporting to the NSRS is the NSRS report form, which is available to all NASA and contractor employees. During the first year of operation the NSRS handled safety hazard reports pertaining to the Space Shuttle program.

Subsequently, the NSRS has been expanded to handle safety hazard reports pertaining to all NASA programs, projects, and operations. The information provided by these reports has resulted in direct changes to NASA policies, procedures, and operations which has significantly reduced NASA's safety risk. Information collected is maintained in accordance with NASA Records Retention Schedule 1441.1, 2017 Edition.

### **3. Use of Information Technology:**

The NASA Safety Reporting System (NSRS) is designed, first and foremost, to be an anonymous hazard reporting system whereby individuals can notify NASA's upper management of safety concerns. Paramount is the protection of that anonymity, and the continued trust and confidence on the part of the submitters that their anonymity will never be compromised. The current, paper-based reporting system ensures the protection of a submitter's anonymity and secure submission of their report by way of the U.S. Postal Service. The NSRS only accepts report via U.S. Postal mail. In person, telephone, fax machine, or online reporting are not accepted; the NSRS cannot guarantee reporter identity via these methods.

An independent contractor receives and processes incoming NSRS reports, removes submitters' identifying information (known as the identification strip), and forwards a transcript version of the reporter's concerns to the NASA Headquarters Office of Safety and Mission Assurance for immediate analysis and investigation. The report is transcribed to cloak the submitter's handwriting and writing style.

### **4. Efforts to Identify Duplication:**

The NSRS is a unique, overarching safety reporting system.

The NSRS is the only Agency wide safety reporting system that encompasses all NASA programs, projects, and operations.

### **5. Burden on Small Business:**

Collection of this information does not have a significant impact on small businesses.

### **6. Consequences of Not Collecting the Information:**

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The NSRS is a critical element of NASA's overall approach to ensuring safety and mission success for all NASA activities. Without the NSRS, NASA's upper management would not have a direct and anonymous Agency wide line of communication for individuals to report hazards or safety concerns that could potentially harm the general public, the NASA workforce, NASA facilities and equipment.

**7. Special Circumstances:**

No special circumstances are applicable to this information collection.

**8. Consultation and Public Comments:**

**60-day FRN:** Federal Register Volume 84, Number 120, on June 21, 2019. No comments were received.

**30-day FRN:** Federal Register Volume 84, Number 191, on October 2, 2019. Comment period is still open.

**9. Payments to Respondents:**

NASA does not provide payments or gifts to respondents.

**10. Assurance of Confidentiality**

The information collection specifically states: "this identification section will be separated from the report and mailed back to you to protect your anonymity. YOUR IDENTITY WILL NOT BE SHARED WITH NASA AT ANY POINT. NO RECORD OF YOUR IDENTITY WILL BE KEPT."

**11. Sensitive Questions:**

Questions of a sensitive nature are not found in this information collection.

**12. Respondent Burden Hours and Labor Costs:**

RESPONDENT CATEGORY	NUMBER OF RESPONDENTS	ESTIMATED COMPLETION TIME	ANNUAL BURDEN
Federal Employees	75	15 minutes	19 hours

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<b>TOTAL</b>	<b>75</b>	<b>15 minutes</b>	<b>19 hours</b>

**13. Estimates of Cost Burden to the Respondent for Collection of Information:**

Using an average federal wage rate of \$41.49 per hour (source: Office of Personnel Management) and a 2019 domestic postage rate of \$0.55, the individual burden cost is:

$$\$41.49 \text{ per hour} \times 0.25 \text{ hours} = \$10.37 + \$0.55 \text{ postage} = \mathbf{\$10.92}$$

Total burden cost assuming 75 respondents per year is:

$$\$10.92 \times 75 = \$819.00$$

**14. Cost to the Federal Government:**

The annualized cost to the Federal government is approximately \$208,000. This includes the cost of investigation of the condition or situation by the principal NASA investigator and supporting investigative team (\$100,000), the cost of the promotional material (\$8,000), and the cost of the administration of the NSRS (\$80,000). The NSRS is administered for NASA's Office of Safety and Mission Assurance by ARES Corporation, and NSRS costs include report processing and administration of an ongoing awareness program.

**15. Changes in Burden:**

No program changes or adjustments are applicable to this information collection.

**16. Publication of Results:**

Not applicable to this information collection.

**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.**

NASA will display the expiration date within the required PRA Statement.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

*The proposed collection of information –*

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- (a) is necessary for the proper performance of the functions of NASA, including that the information to be collected will have practical utility;*
- (b) is not unnecessarily duplicative of information that is reasonably accessible to the agency;*
- (c) reduces to the extent practicable and appropriate the burden on persons who shall provide information to or for the agency, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6)), the use of such techniques as:
  - (1) establishing differing compliance or reporting requirements or timelines that take into account the resources available to those who are to respond;*
  - (2) the clarification, consolidation, or simplification of compliance and reporting requirements; or*
  - (3) an exemption from coverage of the collection of information, or any part thereof;**
- (d) is written using plain, coherent, and unambiguous terminology and is understandable to those who are targeted to respond;*
- (e) indicates for each recordkeeping requirement the length of time persons are required to maintain the records specified;*
- (f) has been developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected, including the processing of the information in a manner which shall enhance, where appropriate, the utility of the information to agencies and the public;*
- (g) when applicable, uses effective and efficient statistical survey methodology appropriate to the purpose for which the information is to be collected; and*
- (h) to the maximum extent practicable, uses appropriate information technology to reduce burden and improve data quality, agency efficiency and responsiveness to the public; and*
- (i) will display the required PRA statement with the active OMB control number, as validated on [www.reginfo.gov](http://www.reginfo.gov)*

**The NASA office conducting or sponsoring this information collection certifies compliance with all provisions listed above.**

**Name:** Eric Raynor

**Title:** Program Manager, NASA Safety Reporting System, Office of Safety and Mission Assurance, NASA Headquarters

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**Email address or Phone number:** [eric.c.raynor@nasa.gov](mailto:eric.c.raynor@nasa.gov) , 202-358-4738

**Date:** 9/16/2019\_\_