

## SUPPORTING STATEMENT

**TITLE OF INFORMATION COLLECTION:** NASA Michoud Assembly Facility Daily COVID Reporting

### **A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary.**

While Michoud Assembly Facility is in a COVID-19 response posture as outlined in the NASA emergency response framework, Facility Director Robert Champion is tasked with collecting COVID case data and reporting that information to NASA Headquarters. This information will support decisions regarding the NASA Response Framework stages as well as decisions that affect the health and safety of employees on the Michoud Assembly Facility campus such as, but not including to, the sanitization of certain areas of the facility. This information gathering method in a form, rather than an email, for example, will help ensure the accuracy and timely reporting of data from tenants on the Michoud Assembly Facility Campus who do not use nasa.gov email addresses and therefore cannot use or access NASA internal tools.

**2. Indicate how, by whom, and for what purpose the information is to be used.**

The information collected is used to make decisions about the Response Framework stages by HQ. The data is also used to indicate where sanitization and cleaning processes will be conducted by approved sanitary contractors as well as return to work-on-site policy decisions. Participation is voluntary.

**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.**

The voluntary reports are submitted through electronic methods. The electronic format is instrument fillable, may be saved on-line, and filed on-line through Google Forms as the transmission. The ability to receive reports electronically assists in the efficiency of processing the responses by human subject matter analysts.

**4. Describe efforts to identify duplication.**

Each individual has been approved as the sole sender of information for their company. Therefore, there is only one individual submitting data for each company through this system. Each company will have one submission per day. The collection data will show the company name and responses by day, and any duplicate information would be immediately flagged and reviewed. Contact information for that company is readily accessible for manual clarification by email or phone number.

No other data of this kind is currently being collected by or for the Michoud Assembly Facility.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of the OMB Form 83-I), describe the methods used to minimize burden.**

There is no impact on small businesses or other small entities. Reports that are submitted are from individuals representing Michoud tenants, civil contractors, or civil servants.

**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.**

Any reduction in voluntary reporting would significantly reduce the availability of safety information that describes cases of COVID-19 related to Michoud Assembly Facility tenants/personnel. Respondents are asked to file these reports daily before 9am in order that MAF can quickly act on that information regarding, but not limited to, sanitization of on-site areas and facilities.

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

Collection will be conducted in an exceptional manner in that it asks respondents to report information to the agency more often than quarterly. Information will be collected daily while NASA Michoud Assembly Facility continues to respond to the COVID-19 situation.

**8. Provide the date and page number of publication in the Federal Register for the 60-day and 30-day FNRS, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**

Because this collection is related to COVID-19, it qualifies for the special short-term fast-track approval process put in place by OMB. These special approvals bypass the usual requirement for the publication of Federal Register Notices, and as such no FRNs were published for this collection.

**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.**

The information in this collection is not subject to the Privacy Act. The reports submitted to Michoud Assembly Facility will contain the personally identifying information provided by the

reporter that if released inadvertently could reveal the reporter’s name and company name. No personal identifying information about the COVID cases being reported will be transmitted through this form. Michoud is following all HIPPA requirements to ensure no collection or transmission of personally identifiable information about COVID related individuals is reported.

NASA offers assurance of confidentiality to its reporters under FAA Advisory Circular 00-46E and title 14 of the Code of Federal Regulations (14 CFR) part 91, § 91.25. Release of personally identifying information is protected from FOIA requests under Exemptions 5 (Deliberative Process Privilege) and 6 (Information that if disclosed would invade another individual’s personal privacy).

**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.**

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

**12. Provide estimates of the hour burden of the collection of information.**

Category of Respondent	No. of Respondents	Participation Time	Burden
Private Sector (NASA HQ Contractors)	31	1 minute	31 minutes
Federal Government (NASA HQ Civil Servants)	1	1 minute	1 minute
<b>Totals</b>	<b>32</b>		<b>.53 hours/day</b>
		x 180 days	<b>95.4 hours</b>

**FEDERAL COST:** The estimated daily cost to the Federal government is \$16 at \$30/user/hour for 32 [100% response rate] survey users [multiplied by the burden] .53 x \$30 = \$16 per day while MAF is in Response Framework 4 for the COVID-19 crisis.

The estimated annual cost is the daily cost of \$16 per day x a maximum of 180 days = \$2880.00

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

The estimate of daily cost to record keepers is \$29 per day for one hour of record keeping per day. The record keeper will be an individual who is a civil servant or a NASA contractor and the \$29 is an estimated cost of unskilled labor per hour.

**14. Cost to the Federal Government: Provide estimates of annualized costs to the Federal**

**government.**

One hour of record keeping and analysis per day x a maximum of 180 days:

$\$29/\text{hour} \times 180 = \$5220.00$

**15. Changes in Burden: Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I, if applicable.**

Not applicable.

**16. Publication of Results: For collections of information whose results will be published, outline plans for tabulation and publication.**

The results of 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.**

Not applicable, the expiration date will be displayed.

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

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

*Name: Leigh Isaacson*

*Title: MAF Communications Integrator*

*Email address or Phone number: Leigh.H.Isaacson@nasa.gov*

*Date: \_\_4/8/2020\_\_*