

**SUPPORTING STATEMENT FOR
COVID-19 Contact Tracing
OMB Control No.: 1601-NEW
COLLECTION INSTRUMENT(S):
COVID-19 Contact Tracing Scripts
COVID-19 Contact Tracing Form
Service Now COVID-19 Contact Tracing Reporting Tool**

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

COVID-19 Contact Tracing information is necessary to support the President's National Guidelines for all phases of *Opening Up America Again*. The Office of Management and Budget (OMB) M-20-23 Memorandum for Heads of Executive Department requires employers to develop and implement policies and procedures for workforce contact tracing following an employee's COVID-19 positive test. The M-20-23 Memorandum requires symptomatic Federal employees and contractors to follow their Agency's process if they are symptomatic or test positive for COVID-19. It specifies that the agency processes should protect the anonymity and privacy of Federal employees and contractors, to the extent possible, while disclosing only the information necessary for agencies to take appropriate actions of notifying potentially affected employees and cleaning the facility. Additionally, per the Centers for Disease Control and Prevention guidance entitled *Get and Keep America Open*, COVID-19 Contact Tracing is essential to reduce the spread of COVID-19. Furthermore, in response to the Coronavirus Pandemic, public health leaders are calling for communities around the country to ramp up capacity and implement a massive contact tracing effort to control spread of the Coronavirus. The response and recovery from the effect of COVID-19 will continue to present Federal agencies with unprecedented challenges, as well as opportunities for improvement, that require new processes and practices such as COVID-19 Contact Tracing to keep the workforce and the public safe. As DHS plans to reconstitute the workforce, it is essential to have an internal DHS Contact Tracing Program that protects the workforce and our families by preventing further spread of COVID-19.

Note: in the following responses the term employee is used to include federal employee, contractor, detailee, volunteer, and intern.

AUTHORITY:

DHS is authorized to collect the information pursuant to Section 319 of the Public Health Service (PHS) Act (42 U.S.C. sec. 274d); DHS Chief Medical Officer’s authorities pursuant to 6 U.S.C. sec. 350 and 6 U.S.C. sec. 597; 6 U.S.C. sec. 464; 21 U.S.C. sec. 360bbb-3; 40 U.S.C. sec. 1315; 42 U.S.C. sec. 97; American with Disabilities Act, including 42 U.S.C. sec. 12112(d)(3), 29 C.F.R. 1630.2(r), 1630.14(b), (c) Workforce safety federal requirements, including the Occupational Safety and Health Act of 1970, Executive Order 12196, 5 U.S.C. 7902; 29 U.S.C. Chapter 15 (e.g., 29 U.S.C. sec. 668), 29 CFR Part 1904, 29 CFR 1910.1020, and 29 CFR 1960.66.

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.

This is a new collection for the agency. The contract tracing process is triggered when an employee voluntarily self-reports to their supervisor that they are COVID-19 positive. The supervisor will provide the employee’s name and contact information to a DHS Supervisory Contact Tracer. The Supervisory Contact tracer will assign a Contact Tracer to contact and interview the COVID-19 positive employee and obtain a list of employees the COVID-19 positive employee was in close contact with, as well as locations in the DHS worksite that the COVID-19 positive employee visited for 15 minutes or more. The Contact Tracer will call the exposed employees to inform them that were exposed by a DHS COVID-19 positive employee so they can take appropriate precautions in minimizing exposure to other DHS personnel and speak with their supervisor to discuss their work status. The contact tracer will not disclose the name or any other personally identifiable information regarding the COVID-19 positive employee to the exposed employees. The contact tracer will inform the exposed employee to notify their supervisor, contracting company (contractors only), medical provider, and local public health authorities to get instructions. The purpose of contact tracing is to control the spread of COVID-19 in the workforce.

The following information will be collected from the respondent:

- Name (first and last)
- COVID-19 lab test result
- Component Name
- Office address
- Personal phone number (Mobile or Home)
- Work phone number
- Work email address
- Where is your primary site of work (e.g., department, floor, field desk location)
- Supervisor Name (First and Last)
- Supervisor’s Phone Number_
- Supervisor’s Email

- All activities, floors visited in the DHS work site, meeting attended (including lunches, etc.) that the COVID-19 positive employee participated in starting 48 hours before their first COVID-19 symptoms began
 - Last date worked in a DHS worksite
 - Names (first and last) of federal employees, contractors, detailees, interns, volunteers who the COVID-19 positive employee was in close contact with, along with the close contacts' work email addresses, work phone numbers, and the last dates of contact.
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.

The collection of information will be automated using Service Now, the existing DHS Information Technology Help desk ticketing platform. Service Now will be modified to be used as the COVID-19 reporting tool. The COVID-19 positive employee will voluntarily inform their supervisor that they are COVID-19 positive. The COVID-19 positive employee or their supervisor will create a new ticket in the COVID-19 reporting tool and include locations in the office that they were in for 15 minutes or more (to initiate facility cleaning) and names of employees they were in close contact with for 15 minutes or more (to identify exposed individuals to notify). The COVID-19 reporting tool will create a ticket and route this to the employee's supervisor and the supervisory contract tracer. The supervisory contact tracer will assign the case (ticket) to the contact tracer. The contact tracer will call the COVID-19 positive employee to verify information submitted by the employee. The Contact Tracer will call the exposed employees to inform them that were exposed to a DHS COVID-19 positive employee so they can take appropriate precautions in minimizing exposure to other DHS personnel and speak with their supervisor to discuss their work status as detailed in response #2.

The basis of the decision for adopting Service Now as a contact tracing reporting/collection tool are: Service now is an existing operating system with an approved Authority to Operate and is in accordance with DHS IT policies, procedures, and controls. Using information technology helps to streamline the process, adds uniformity, and reduces the burden on the contact tracer. The system includes an active directory for all DHS personnel, and contains the data collection, routing, reporting, and tracking capability required to automate contact tracing reporting, case (ticket) assignment and disposition.

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.

This information collection request is unique to DHS in response to the COVID-19 pandemic. The DHS-wide program information is based on minimum criteria in accordance with CDC guidance. Contact Tracing will be localized and led by DHS Components and Offices. This information collection is based off existing information collection at USCIS and planned information collection at FEMA and has been modified for DHS-wide use.

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

This information collection request will not impact small businesses or other small entities.

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.

In response to the Coronavirus Pandemic, public health leaders are calling for communities around the country to ramp up capacity and implement a massive contact tracing effort to control spread of the Coronavirus. The response and recovery from the effect of COVID-19 will continue to present Federal agencies with unprecedented challenges, as well as opportunities for improvement, that require new processes and practices such as COVID-19 Contact Tracing to keep the workforce and the public safe. As DHS plans to reconstitute the workforce, it is essential to have an internal DHS Contact Tracing Program that protects the workforce and our families. It is also essential to comply with requirements in the President's National Guidelines for all phases of *Opening Up America Again*, the Office of Management and Budget (OMB) M-20-23 Memorandum for Heads of Executive Department, the Centers for Disease Control and Prevention guidance entitled *Get and Keep America Open*, and for DHS to fulfill its overall mission. If DHS does not establish an internal COVID-19 Contact Tracing program capable of quickly identifying, isolating, tracking, and being aware of potential office outbreaks and workforce exposures, COVID-19 can unknowingly spread throughout the DHS workspace and negatively impact mission readiness and National Security.

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 secret, 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.

There are no special circumstances that would cause the contact tracing information collection to be conducted in this manner.

8. If applicable, provide a copy and identify the data 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 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 3 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.

The collection is being sought through the Emergency Clearance Process. DHS will follow the normal clearance process upon approval.

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

DHS will not provide any payment or gift to respondents.

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

As required by the COVID-19 Contact Tracing Script, the Contact Tracer is required to read the following statement at the beginning of the call with each respondent:

“Before we begin, I would like to provide you with the following privacy notice: DHS is requesting information as part of this call for the purpose of maintaining and ensuring a healthy workforce and a safe DHS workspace. Further, this information will help the Department in slowing down the spread of COVID-19 by notifying those individuals who may have been exposed to the disease so that they can take appropriate precautions in minimizing exposure to other DHS personnel and DHS-affiliated personnel. As such, DHS may use the information I collect from you to provide notifications to other potentially exposed personnel. No personally identifiable information will be shared on you to those personnel in an identifiable format. However, information contained from this call may be shared with my supervisory contact tracer to ensure data is appropriately collected. In addition, if you report symptoms of COVID-19, this information may be shared with your supervisor so that he or she may work with you on your work status. Further, no personally identifiable information collected from this call will be shared outside of DHS. This collection is voluntary. However, your participation is requested because contact tracing is a key strategy for preventing further spread of COVID-19.”

The following privacy notice is imprinted on the COVID-19 Contact Tracing script and form:

WARNING: This document is FOR OFFICIAL USE ONLY (FOUO). It contains information that may be exempt from public release under the Freedom of Information Act (5 U.S.C. 552) and the Privacy Act (5 U.S.C 552a). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with DHS policy relating to FOUO information and is not to be released to the public or other personnel who do not have a valid "need-to-know" without prior approval of an authorized DHS official.

The following Privacy Act Statement is for the Service Now COVID-19 Contact Tracing Reporting Tool

Contact Tracing Privacy Act Statement

Pursuant to 5 U.S.C. § 552a(e)(3), this Privacy Act Statement serves to inform you of why DHS is requesting the information that will be collected by this information system.

AUTHORITY:

DHS is authorized to collect the information pursuant to Section 319 of the Public Health Service (PHS) Act (42 U.S.C. sec. 274d); DHS Chief Medical Officer's authorities pursuant to 6 U.S.C. sec. 350 and 6 U.S.C. sec. 597; 6 U.S.C. sec. 464; 21 U.S.C. sec. 360bbb-3; 40 U.S.C. sec. 1315; 42 U.S.C. sec. 97; American with Disabilities Act, including 42 U.S.C. sec. 12112(d)(3)(B), 29 C.F.R. 602.14, 1630.2(r), 1630.14(b)(1), (c)(1), (d)(4); Medical Examinations for Fitness for Duty Requirements, including 5 C.F.R. Part 339; Genetic Information Nondiscrimination Act (GINA), including 42 U.S.C. Chapter 21f, 29 C.F.R. Part 1635; Workforce safety federal requirements, including the Occupational Safety and Health Act of 1970, Executive Order 12196, 5 U.S.C. 7902; 29 U.S.C. Chapter 15 (e.g., 29 U.S.C. sec. 668), 29 CFR Part 1904, 29 CFR 1910.1020, and 29 CFR 1960.66.

PURPOSE:

DHS will be collecting the information for the purpose of maintaining and ensuring a healthy workforce and a safe DHS workspace. This information will help the Department to prevent the spread of infectious disease by notifying those individuals who may have been exposed so they can take appropriate precautions in minimizing exposure to other DHS personnel and DHS-affiliated personnel.

ROUTINE USES:

The information will not be shared externally or with any third parties. It will only be used by the DHS Component or Office who employs the individual about whom the information will be collected. Further, no personally identifiable information will be shared with anyone other than the individual's supervisor and the assigned contact tracer. A complete list of routine uses for the information this system will collect can be found in the system of records notice associated with the system "Office of Personnel Management/GOVT-10 – Employee Medical File System Records." The Department's full list of system of records notices can be found on the Department's website at <http://www.dhs.gov/system-records-notices-sorns>.

CONSEQUENCES OF FAILURE TO PROVIDE INFORMATION:

Providing information via this system is completely voluntary and no adverse action will be taken against individuals who refuse to participate. However, participation is requested because contact tracing is a key strategy in preventing further spread of infectious disease among the DHS workforce.

The Contact Tracer is required to sign a DHS non-Disclosure Agreement and take the following DHS Training - Privacy and Protecting Personal Information, IT Security Awareness and Rules of Behavior, Cybersecurity Awareness and one of the following Contact Tracer Trainings offered by the Michigan Department of Public Health Michigan Department of Public Health <https://www.train.org/wv/course/1091008/>. Additional contact tracing will be available from the Association of State and Territorial Health Officials <https://learn.astho.org/p/ContactTracer> and Johns Hopkins University <https://www.coursera.org/learn/covid-19-contact-tracing?action=enroll&edocomorp=covid-19-contact-tracing>

The Supervisory Contact Tracer is required to review a minimum of 10% of interview calls with Contact Tracers to ensure comprehensive and high-quality interviews and compliance with privacy and confidentiality.

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 person's form whom the information is requested, and any steps to be taken to obtain their consent.

DHS will not ask questions regarding sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The COVID-19 positive employee voluntarily self-reports to their Supervisor or submits a report of their COVID-19 positive result to the automated system. The questions asked by the Contact Tracer are minimal requirements according to the Centers for Disease Control and Prevention and industry standard for contact tracing. The information is for DHS internal use only in order to prevent the spread of COVID-19 amongst the DHS workforce and to implement workplace and administrative controls. The information will only be used to notify an exposed employee that they were exposed to a COVID-19 positive employee and to notify facilities management regarding DHS work site areas requiring sanitization.

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 in Item 13 of OMB Form 83-I.
- 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. Instead, this cost should be included in Item

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Federal Contractors	Contact Tracing Form	500	1	20 mins	167	\$45.94	\$918.80
Total							

Source <https://www.bls.gov/oes/current/oes131111.htm>

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).
 - 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. 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), use 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.

There is no cost to the respondents.

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The Department intends to use existing resources and, therefore, no new payroll obligations will be incurred. This will allow the Department flexibility to use personnel from across the organization, consistent with its needs and where it is able to do so consistent with its existing authority and all applicable laws. The existing DHS office-grade multi-station printer will be used. The only new expense for the Federal government will be issuance of a laptop to ~500 Contact Tracers. The laptop is estimated to cost \$1200.00 each. This cost is \$6,000.00 Source:

https://www.gsaadvantage.gov/advantage/ws/search/advantage_search?q=1:4ADV.AS.GSSIT*&s=10&searchType=1

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

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.

DHS will not publish contact tracing information. DHS will conduct simple analytics on the information to determine if outbreaks or high rates of exposures are occurring

amongst the workforce. The information will be used to contain the spread of COVID-19 and keep the workforce safe by notifying exposed employees, identifying buildings requiring closure, areas needing deep cleaning and sanitization, and re-engineering where or how the workforce travels throughout the workspace. Since there is no treatment or vaccine for COVID-19 the contact tracing program and information collection is expected to be active for the next 18 to 24 months.

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.

DHS will display the expiration date for OMB approval.

8Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

There is no exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.