



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF MISSION SUPPORT

### **MEMORANDUM**

**SUBJECT:** Emergency Information Collection Request for Public Health Emergency Workplace Response System (OMB Control Number 2030-NEW; EPA ICR Number 2676.01)

**FROM:** Daniel Coogan, Acting Director  
Office of Resources and Business Operations

**THRU:** Courtney Kerwin, PRA Clearance Officer  
and Director for Regulatory Support Division  
Office of Enterprise Information Programs

**TO:** Danielle Jones, OMB Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget

Pursuant to section 3507(j) of the Paperwork Reduction Act (PRA) (44 U.S.C. 3501 et seq.), as implemented in the Office of Management and Budget (OMB) regulations at 5 CFR §1320.13, the Environmental Protection Agency (EPA) is hereby requesting emergency processing of an information collection necessary for contact tracing EPA employees, contractors and grantee recipients that perform work in EPA facilities.

Following the normal clearance procedures for approval of this information collection during the COVID-19 pandemic response will delay the Agency's ability implement contract tracing and to adequately protect its workforce. EPA certifies the requirements of 5 CFR 1320.13(a) are met and it is vital for this collection to be implemented immediately because: (1) this information is necessary to protect EPA's workforce, (2) public harm is reasonably likely to result if normal clearance procedures are followed, and (3) an unanticipated event has occurred.

#### **Information Collection is Essential to the Mission of the Agency**

OMB Memorandum M-20-23, "Aligning Federal Agency Operations with the National Guidelines for Opening Up American Again," dated April 20, 2020, requires employers to develop and implement policies and procedures for workforce contact tracing following an employee's COVID-19 positive test. In doing so, M-20-23 requires symptomatic Federal employees and contractors to follow their Agency's process if they are symptomatic or test positive for COVID-19. EPA's processes will 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 (CDC) 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 EPA plans to reconstitute the workforce, it is essential to have an internal EPA Contact Tracing Program that informs mission readiness and protects our workforce.

### **Information Collection Activities Involved in this Emergency Request**

Because of the substantial risk to life, safety, or health of the workforce and the public, EPA requests emergency approval to collect the necessary information from detailees, interns, volunteers, grantee recipients and contractors that perform work in EPA facilities to implement an effective COVID-19 Contact Tracing program.

Each item of information requested is based on CDC and industry best practice for Contact Tracing. This information is necessary to identify individuals in the workforce who are COVID-19 positive and to notify and trace persons in the workforce who were in close contact with the COVID-19 positive employee. This enables EPA to capture the total workforce and take appropriate action.

The following information will be collected for COVID Contact Testing:

- Name;
- Work location;
- Contact information;
- Supervisor;
- Health status;
- Close contacts (as defined by CDC) when in the office; and
- Building and floors visited during period of possible transmission (as defined by CDC).

### **EPA Cannot Reasonably Comply with the Normal Clearance Procedures**

EPA cannot reasonably comply with the normal clearance procedures because: (1) an unanticipated event has occurred; and (2) public harm is reasonably likely to result if normal clearance procedures are followed.

As the COVID-19 pandemic continues to grow, the full scope of the impact to Americans remains unknown. We do know however that for government offices to safely open, a robust contact tracing program must be implemented. Contact tracing is a critical tool to control the spread of COVID-19. Delay in approval of this information collection will disrupt EPA's ability identify, alert, isolate and trace COVID-19 positive members of the EPA workforce. In order to reconstitute its workforce of federal employees, contractors, volunteers, grantees, and interns, EPA must be aware of potential office outbreaks, workforce exposures, and areas requiring sanitization to prevent the further spread of COVID-19. It would be impracticable and contrary to the public health to delay implementing this collection of information collection until after EPA has completed the normal PRA clearance procedures.

### **Agency Has Taken All Practicable Steps to Consult with Affected Parties in Order to Minimize Burden**

To formulate the data elements to be collected for proper and efficient contact tracing, EPA consulted the CDC, EPA Public Health experts, and the Department of Homeland Security's Contact Tracing Team.

### **Requested Time Period for OMB Action**

EPA requests that OMB take action on this request by December 4, 2020.

Thank you for your assistance in processing this request. Should any questions arise, please contact me at 202-564-1862 or Courtney Kerwin at 202-566-1669.

## ATTACHMENT 1: Estimated Burden and Costs for This Information Collection Activity

Type of Respondent	Form Name	Number of Respondents	Number of Responses per Respondent	Number of Responses (Total)	Average Burden per Response	Total Annual Burden (hours)
Survey	Public Health Emergency Workplace Response System	250	1	250	.25	62.5

### Bottom Line Burden

**Respondents:** 250  
**Responses:** 250  
**Hours:** 62.5  
**Capital/O&M Costs:** \$0

## ATTACHMENT 2: Information Collection Instrument

Number	<input type="text"/>	Opened by	<input type="text" value="Daniel Coogan"/>
* Person	<input type="text"/>	* Assignment group	<input type="text"/>
* Health status	-- None --	* Contact Tracing State	Open
Close notes	<input type="text"/>	* Assigned to	<input type="text"/>

The purpose for the collection will be to provide the necessary data for proper medical evaluations and diagnoses, to ensure that proper treatment is administered, and to maintain continuity of medical care. Collect information will only be disclosed to those that have a need to know, where there is a compelling circumstance affecting the health or safety of an individual.

You have read the statement above to the employee?

You have advised the employee to speak with their medical provider and to follow CDC guidance and local health office guidance.

You have advised the employee to speak with their medical provider?

Intake Interview - Employee Details*	Intake Interview - Supervisor Details	Intake Interview - Work Location D...	Intake Interview - Exposed Individ...	Final Interview - Return to Work	Phone Log	Notes
* Program/Region	-- None --		* Employee Status	-- None --		
Updated Department	<input type="text"/>		EPA Email	<input type="text"/>		
	If the Department is incorrect, please select the correct option here		Business Phone	<input type="text"/>		
Updated Work Location	<input type="text"/>		* Best Phone Number for Contact	<input type="text"/>		
	If the Work Location is incorrect, please select the correct option here		* What day did the person begin experiencing symptoms consistent with COVID-19?	<input type="text"/>		
			Duration	<input type="text"/>		

Intake Interview - Employee Details *	Intake Interview - Supervisor Details	Intake Interview - Work Location D...	Intake Interview - Exposed Individ...	Final Interview - Return to Work	Phone Log	Notes
Contract Officer Representative Name	<input type="text"/>		Supervisor	<input type="text"/>		
Contract Number	<input type="text"/>		Supervisor Email	<input type="text"/>		
SEE Monitor Name	<input type="text"/>		Supervisor Phone Number	<input type="text"/>		
SEE Grantee	-- None --		Supervisor Phone Type	-- None --		
Cooperative Agreement Number	<input type="text"/>					
COR/SEE/Other Phone	<input type="text"/>					

Intake Interview - Employee Details *	Intake Interview - Supervisor Details	Intake Interview - Work Location D...	Intake Interview - Exposed Individ...	Final Interview - Return to Work	Phone Log	Notes								
What dates was the person in the office during the period, starting 2-days prior to the onset of the symptoms to today's date?														
<div style="border: 1px solid #ccc; padding: 5px;"> <b>Work Locations visited</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 35%;">Date</th> <th style="width: 40%;">Location</th> <th style="width: 20%;">Floor(s)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">+</td> <td colspan="3">Insert a new row...</td> </tr> </tbody> </table> </div>								Date	Location	Floor(s)	+	Insert a new row...		
	Date	Location	Floor(s)											
+	Insert a new row...													

Intake Interview - Employee Details *	Intake Interview - Supervisor Details	Intake Interview - Work Location D...	Intake Interview - Exposed Individ...	Final Interview - Return to Work	Phone Log	Notes														
On each day the person came into the office during that period, what employees/staff did the person come into close contact with? (Note: Close contact is defined as within 6 feet for 15 minutes or more.)																				
<div style="border: 1px solid #ccc; padding: 5px;"> <b>Exposed Contacts</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 15%;">Name</th> <th style="width: 15%;">Business Phone</th> <th style="width: 15%;">EPA Email</th> <th style="width: 15%;">Program/Region</th> <th style="width: 15%;">Updated Location</th> <th style="width: 20%;">Office/Cubicle</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">+</td> <td colspan="6">Insert a new row...</td> </tr> </tbody> </table> </div>								Name	Business Phone	EPA Email	Program/Region	Updated Location	Office/Cubicle	+	Insert a new row...					
	Name	Business Phone	EPA Email	Program/Region	Updated Location	Office/Cubicle														
+	Insert a new row...																			

Intake Interview - Employee Details *	Intake Interview - Supervisor Details	Intake Interview - Work Location D...	Intake Interview - Exposed Individ...	Final Interview - Return to Work *	Phone Log	Notes
Employee had not have a fever (w/o use of fever reducers) for at least 24 hours?	<input type="text" value="Yes"/>					
At least 10 days have passed since the onset of symptoms?	<input type="text" value="Yes"/>					
* Employee and Supervisor notified that the employee is able to return to work?	<input type="text" value="-- None --"/>					