

## SUPPORTING STATEMENT

**TITLE OF INFORMATION COLLECTION:** NASA Enterprise Salesforce COVID-19 Contact Tracing

**TYPE OF INFORMATION COLLECTION:** New collection, upon a COVID+ case occurring, the new collection requesting Name, Phone (Work or Personal) and email (Work or Personal) of all individuals the COVID+ individual has been in contact with.

### **A. JUSTIFICATION**

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

The National Aeronautics and Space Administration (NASA) employs over 60,000 civil service and contractor personnel across the U.S. During this nationwide COVID-19 pandemic all but essential personnel are working remotely. While there is no definitive timeline for when this global pandemic will be over; when NASA initiates plans to reopen its facilities, it will be necessary to track and trace employee health related interactions safely and securely.

The collection of information that is being collected is authorized by:

- **OMB Memorandum M-20-23**
  - Develop and implement policies and procedures for workforce contact tracing following employee COVID+ test.
  
- **5 USC, Section 7901**
  - The head of each agency of the Government of the United States may establish, within the limits of appropriations available, a health service program to promote and maintain the physical and mental fitness of employees under his jurisdiction.
  
- **51 U.S.C., Section 20113(a)**
  - (k) CONCESSIONS FOR VISITORS' FACILITIES. —
  - (1) IN GENERAL. —
    - In the performance of its functions, the Administration is authorized to provide by concession, without regard to section 1302 of title 40, on such terms as the Administrator may deem to be appropriate and necessary to protect the concessioner against loss of the concessioner's investment in property (but not anticipated profits) resulting from the Administration's discretionary acts and decisions, for the construction, maintenance, and operation of all manner of facilities and equipment for visitors to the several installations of the Administration and, in connection therewith, to provide services incident to the dissemination of information concerning its activities to such visitors, without charge or with a reasonable charge therefor (with this authority being in addition to any other authority that the Administration may have to provide facilities, equipment, and services for visitors to its installations).

- **44 U.S.C., Section 3101**
  - The head of each Federal agency shall make and preserve records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency and designed to furnish the information necessary to protect the legal and financial rights of the Government and of persons directly affected by the agency's activities
- **42 CFR Part 2**
  - 2.1 Statutory authority for confidentiality of substance use disorder patient records.
    - Title 42, United States Code, Section 290dd-2(g) authorizes the Secretary to prescribe regulations. Such regulations may contain such definitions, and may provide for such safeguards and procedures, including procedures and criteria for the issuance and scope of orders, as in the judgment of the Secretary are necessary or proper to effectuate the purposes of this statute, to prevent circumvention or evasion thereof, or to facilitate compliance therewith.

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

The information will be used to determine whether NASA personnel have been exposed to the COVID-19 virus and to track and trace their interactions across the NASA community for identifying possible points of exposure.

Those individuals that volunteer, will be contacted by a NASA Contact Tracer, a to-be-designated NASA healthcare employee, and will be first read the privacy act, to understand their rights and what this information will be used for. Then they will be asked, orally, to confirm if they have symptoms or not (yes/no question). The Tracer will then enter that information, as well as the names, phone numbers, and emails of those they have been in contact with into the newly developed tracking and tracing digital application on NASA's enterprise solution, Salesforce.

While participation is voluntary, it is strongly encouraged as failure to provide the requested information may result in potential increased exposure of personnel to the virus.

NASA may share this information for authorized purposes with (1) private or other government health care providers or agencies for referral or special program responsibilities, and (2) other entities outlined under standard routine uses for all NASA systems of records.

**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 data is collected orally by a NASA Contact Tracer, a to-be-designated NASA healthcare employee, who will then enter all the information into the newly developed tracking and tracing digital application on NASA's enterprise solution, Salesforce.

The ability for the Tracer to keep records through this electronic method will ensure higher rate of inclusion and assists in the efficiency of the stages of report processing by human subject matter analysts.

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

There is no duplication as there are no other sources available to collect this information.

**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.**

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

**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 provided voluntarily that may result in potential increased exposure of personnel to the virus.

There is no other voluntary, confidential, non-punitive reporting option available to these individuals. Respondents are not required to file these reports with any frequency, rather the respondents decide when and how often to submit.

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

Due to the debilitating nature of COVID-19, there might be an exception made should the individual with the virus be incapacitated (on a ventilator, etc.) and unable to respond. A proxy, family member or close friend, with the information desired, would be asked to provide it on behalf of the individual.

**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.**

**60-day FRN:** Federal Register Volume 85, Number 155, on 08/11/2020. No comments were received.

**30-day FRN:** Federal Register Volume 86, Number 035, on 02/24/2021. No comments were received.

**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 enterprise-wide existing Salesforce application is currently FedRAMP compliant. In addition, the confidentiality of the data will be maintained through the NASA Privacy Act System of Records NASA 10 HIMS, Health Information Management System.

Records are maintained on secure Salesforce servers and protected in accordance with all Federal standards and those established in NASA regulations at 14 CFR 1212.605. Additionally, server and data management environments employ infrastructure encryption technologies both in data transmission and at rest on servers.

Electronic messages sent within and outside of the Agency that convey sensitive data are encrypted and transmitted by staff via pre-approved electronic encryption systems as required by NASA policy. Approved security plans are in place for information systems containing the records in accordance with the Federal Information Security Management Act of 2002 (FISMA) and OMB Circular A-130, Management of Federal Information Resources. Only authorized personnel requiring information in the official discharge of their duties are authorized access to records through approved access or authentication methods. Access to electronic records is achieved only from workstations within the NASA Intranet, or remotely via a secure Virtual Private Network (VPN) connection requiring two-factor token authentication using NASA-issued computers or via employee PIV badge authentication from NASA-issued computers.

**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 found in this information collection

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

The following assumptions were made to calculate the estimate of the burden for the collection

of information:

- In any given year, there will be roughly 60,000 NASA personnel coming and out the centers.
- Assuming that all of them are tested and the current CDC positive results rate remain at 9% of those tested, we can assume conservatively, that there will be a potential of 5,400 COVID+ case individuals that will require this information be collected from them.
- Assuming that all 5,400 of those volunteer to report this information and the collection by the NASA Contract Tracer taking up to 30 minutes for each based on the current guided script. We can assume an additional 30 minutes for the Tracer themselves to further follow-up on the data received from each of the COVID+ case individuals.

| RESPONDENT CATEGORY    | NUMBER OF RESPONDENTS | ESTIMATED COMPLETION TIME | ANNUAL BURDEN      |
|------------------------|-----------------------|---------------------------|--------------------|
| COVID+ Case Individual | 5,400                 | 30 minutes                | 2,700 hours        |
| <b>TOTAL</b>           | <b>5,400</b>          | <b>30 minutes</b>         | <b>2,700 hours</b> |

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

Assuming that every single NASA COVID+ case individual responds to the NASA Contact Tracer and the average salary for a NASA employee is estimated to be at \$91,710 a year (payscale.com) or \$44/hour. **The annualized cost would be estimated at: \$118,800**

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

The cost of this to the federal government is in two parts:

- The first is limited to the development of the Accenture prepackaged application for Salesforce and the hours by NASA paid personnel to maintain and report on it.
- The second is the hours that NASA Contact Tracers will spend collecting the information from the COVID+ case individuals, entering that data, and following up with the contacts provided for them.
  - Using the same formula above, but calculating conservatively that each NASA Contact Tracer will spend up to 8 hours with each COVID+ Case Individual to collect, enter, and follow-up with the data given, we are given an annual burden of 43,200 hours, which multiplied by the average hourly rate for a NASA employee (\$44/hour) **gives us an annualized labor cost at an estimate of \$1,900,800**

**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.**

There will be no publication of results.

- 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.**

No exception is being requested.

- 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.**

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**Date:** 3/9/2021

*(Certifying individual must be a civil service employee)*