

Public Health Emergency Workplace Response System

OMB Control Number 2030-0049; EPA ICR Number 2676.02

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.

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.

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.

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).

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.

EPA created the Public Health Emergency Workplace Response System to support the Agency's ability to provide a safe and healthy working environment in EPA locations (i.e., locations where the Agency is conducting official business) during a public health emergency (e.g., a Presidential declaration of a national public health emergency, U.S. Department of Health and Human Services declaration of a public health emergency, or other circumstances constituting a public health emergency). The system will allow the Agency to develop and institute safety measures in response to public health emergency contaminants (e.g., a pathogen or chemical) as needed, including contact tracing—identification, monitoring, and support of an affected individual (an individual in an EPA location with confirmed or probable exposure to a public health emergency contaminant), and identification and contact of a potentially affected individual (an individual who was in contact with an affected individual or exposed to a public health emergency contaminant while in an EPA location).

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 is not collected elsewhere within EPA. Each item of information requested is based on CDC and industry best practice for Contact Tracing.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection of information 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.

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. Not collecting this information 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.

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 secrets, 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 information collection to be conducted in this manner.

8. If applicable, provide a copy and identify the date 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.

On April 30, 2021, EPA published a notice in the Federal Register soliciting public comment for 60 days on the information collection. No comments were received.

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.

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

EPA 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.

The Contact Tracer reads the following statement at the beginning of the call with each respondent:

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. Collected 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.

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 persons from whom the information is requested, and any steps to be taken to obtain their consent.

EPA does not ask questions regarding sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The questions are minimal requirements according to the Centers for Disease Control and Prevention and industry standard for contact tracing. 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.

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

Number of Respondents	Number of Responses per Respondent	Number of Responses (Total)	Average Burden per Response (Hours)	Total Annual Burden (Hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
250	1	250	.25	62.5	\$73.50	\$4557.00

* An hourly wage of \$45.94 was increased by 60% to account for benefits and overhead; source <https://www.bls.gov/oes/current/oes131111.htm>.

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

There are no capital or O&M costs associated with this collection.

14. Provide estimates of annualized costs to the Federal government.

EPA intends to use existing federal employees and therefore no new obligations will be incurred.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

There are no changes reported on the burden worksheet.

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

EPA will not publish results from the 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.

EPA will display the expiration date for OMB approval.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.

There is no exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”