

Safety and Health Information Collection

OMB Control Number: 0693-0080

Expiration Date: 8/31/2024

Justification of Non-Substantive Change

This justification is written in support of a NIST request for a non-substantive change to an existing, approved information collection.

NIST is implementing an automated system for the digital collection of Health Unit information. During the process of identifying fields that align with the approved PRA submission (OMB Control Number 0693-0080), the program office noted an opportunity to reduce the information collection by two data fields.

Employee health records must be sent to Records Storage (WNRC) when a federal employee separates from service. To accomplish this, the employee's Social Security Number is needed (this is a records requirement by NARA). Upon review of the NIST workflow, it was deemed that NIST does not need to collect the data fields of social security number and driver's license at the Health Unit level due to the fact it is already collected by the Human Resources office. Dropping the two fields will not only erase a duplicative measure but will also reduce the amount of sensitive PII being collected.

As noted in the OMB Memorandum of July 16, 2016, "Flexibilities under the Paperwork Reduction Act for Compliance with Information Collection Requirements", the development of interactive, web-based or similar applications to help facilitate responses may be considered a non-substantive change in an existing and approved information collection. The memo states, "Many existing, already approved forms may also greatly benefit from the development of such assistance materials. As long as the underlying, approved form is not altered and the interactive materials essentially collect the same information, then OIRA considers these applications a non-substantive change to an already approved collection and would encourage their development". This is the case for the NIST Safety and Health Information Collection. Additionally, there will be no change in reported burden to the information collection.