SUPPORTING STATEMENT

U.S. Department of Commerce

National Institute of Standards and Technology

Safety and Health Information Collection

OMB Control No. 0693-0080

Abstract

The National Institute of Standards and Technology (NIST) is a unique federal campus which hosts daily a range of non-federal individuals. Non-federal individuals may include NIST Associates, volunteers, students, and visitors. In order to provide these individuals with proper health care and health documentation, NIST is pursuing renewal of approval of three health unit forms.

The information is collected for the following purposes:

1. For medical treatment, testing, or recording of medical or safety equipment or incidents.

2. To refer information required by applicable law to be disclosed to a Federal, State, or local public health service agency, concerning individuals who have contracted certain communicable diseases or conditions. Such information is used to prevent further outbreak of the disease or condition.

3. To disclose information to the appropriate Federal, State, or local agencies responsible for investigation of an accident, disease, medical condition, or injury as required by pertinent legal authority.

4. To disclose to the Office of Workers' Compensation Programs about a claim for benefits filed.

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.

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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.

The NIST Health Unit utilizes three forms in which we seek renewed approval for.

A. NIST-986: Health Record

Used as an intake form for any NIST Associate, or visitor who comes to the Health Unit to receive medical care or service. While a voluntary form, Health Unit staff request it be completed upon first visit and updated annually or upon next visit, whichever is later. The completed form is kept in the individual's health file contained in locked filing cabinets or in the Electronic Medical Records System secured at the moderate level.

B. NIST-985: Injury/Illness/Exposure Assessment

Used to document medical care provided to any NIST Associate, or visitor related to injury, illness, or exposure. The "patient" does not personally fill this form out, but information asked via interview is recorded. Completed forms are kept in the individual's health file contained in locked filing cabinets. The forms are also faxed to appropriate NIST staff who are responsible for NIST's OSHA recording keeping requirements related to workplace injuries and illnesses.

C. NIST-426: Audiological History

Used as part of NIST's Hearing Protection Program for any NIST Associate. It is completed once and begins the documentation of an individual's audiological history at NIST. The individual does not personally fill this form out, but information asked via interview and testing is recorded. The completed form is kept in the individual's health file contained in locked filing cabinets or in the Electronic Medical Records System secured at the moderate level.

The information collected will not be disseminated to the public or used to support information that will be disseminated to the public.

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.

Information is collected from individuals on paper and entered into Microsoft Office and web applications that are secured on protected NIST servers and in an Electronic Medical Records System secured at the moderate level. Information may also be collected by interview or as required for medical inquiries or medical equipment, e.g., audiometer.

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.

Web applications use central repositories whenever possible to keep duplication at a minimum and to protect the integrity of the data. NIST established an internal review process that will examine each survey or data collection effort to be conducted under the generic clearance—to prevent internal duplication of effort and to ensure that appropriate data collection instruments are developed. NIST is confident that the procedures in place ensure that there will be no duplication.

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

The collection of this information does not involve 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.

General health reporting information is given voluntarily and is not required in order to receive care in the NIST Health Units. There is no consequence to Federal program or policy activities if this collection is not conducted.

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.

The collection will be conducted in a manner consistent with OMB guidelines.

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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to

these comments. 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.

A 60-day notice was published in the Federal Register, Vol. 89, No. 96, pages 42847-42848, on May 16, 2024. No comments were received.

A 30-day notice was published in the Federal Register, Vol 89, No. 167, pages 68862-68863, on August 28, 2024.

Data collected under this information collection is typical information health care workers ask in order to provide care to individuals.

NIST will consult with various stakeholders within the realm of safety and health offices (for example the NIST Health Unit and audiologists) from whom information is to be obtained or those who must compile records at least once every 3 years.

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

There will be no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

In accordance with the privacy provisions of the E-Government Act of 2002, a privacy impact assessment is required for this information system. Information is maintained in the system's Department's Senior Agency Official for Privacy approved PIA, 150-01, Office of Safety, Health, and Environment, which reflects the collection and maintenance of Health Unit related information. It is publicly available on the Department's privacy program page available at: https://www.commerce.gov/opog/privacy/PIA.

Data confidentiality will be protected per the Federal Information Security Modernization Act with security protections commensurate with the moderate risk level. NIST will provide Privacy Act Statements on any forms where applicable. A Privacy Act Notice will be stated on the form. This collection is covered under SORN Commerce/Dept 18 and OPM/GOVT-10.

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.

Only relevant questions pertaining to health and safety will be utilized when an individual seeks care on the federal campus.

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

NIST estimates the burden hours to be 168 hours for non-federal individuals utilizing the NIST Health Unit facility:

Number of Respondents: 999

Average Hours Per Response: 10 minutes per response.

Burden Hours: 168 hours

13. Provide an estimate for 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 already reflected on the burden worksheet).

There are no known out-of-pocket costs to the respondents or record keepers (the public).

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

This information collection will involve several NIST employees that will devote a portion of their time, to plan, coordinate, administer, or monitor the overall types of individual information collections to be conducted. NIST estimates that it would involve an annual estimated total of 780 hours (15 hours per week) and an estimated cost of $87,000 per year (based on a loaded professional salary of $116 / hour).

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

There are no changes or adjustments to this information 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.

Collection results will not be published.

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.

The OMB Control Number, expiration date, Public Burden Statement, and Privacy Act Statement will be displayed on each form.

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

There is no exception to the certification statement.