
Supporting Statement for the Human Reliability Program

Part A: Justification

OMB No. 1910-5122

Collection Instruments

1. Human Reliability Program Certification (DOE F 470.3)
 2. Acknowledgement and Agreement to Participate in the Human Reliability Program (DOE F 470.4)
 3. Authorization and Consent to Release Human Reliability Program (HRP) Records in Connection with HRP (DOE F 470.5)
 4. Human Reliability Program (HRP) Alcohol Testing Form (DOE F 470.7)
 5. Human Reliability Program (HRP) Alcohol Testing Form (DOE F 470.12) – LANL Use Only
- -

Table of Contents

Part A: Justification.....	i
Introduction.....	1
A.1. Legal Justification.....	1
A.2. Needs and Uses of Data.....	2
A.3. Use of Technology.....	3
A.4. Efforts to Identify Duplication.....	3
A.5. Provisions for Reducing Burden on Small Businesses.....	3
A.6. Consequences of Less-Frequent Reporting.....	3
A.7. Compliance with 5 CFR 1320.5.....	4
A.8. Summary of Consultations Outside of the Agency.....	4
A.9. Payments or Gifts to Respondents.....	5
A.10. Provisions for Protection of Information.....	5
A.11. Justification for Sensitive Questions.....	5
A.12A. Estimate of Respondent Burden Hours.....	5
A.12B. Estimate of Annual Cost to Respondent for Burden Hours.....	6
A.13. Other Estimated Annual Cost to Respondents.....	7
A.14. Annual Cost to the Federal Government.....	7
A.15. Reasons for Changes in Burden.....	7
A.16. Collection, Tabulation, and Publication Plans.....	8
A.17. OMB Number and Expiration Date.....	8
A.18. Certification Statement.....	8

Introduction

Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.

This supporting statement provides information regarding the Department of Energy (DOE) Paperwork Reduction Act submission request pertaining to the Human Reliability Program collection.

The purpose of this collection is to ensure that individuals who occupy positions affording access to certain materials, nuclear explosive devices, facilities, and programs meet the highest standards of reliability and physical and mental suitability.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on May 23, 2022, volume 87, number 99, page 31222. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

Information in the collection is collected through a series of methods (listed below):

Human Reliability Program Certification (DOE F 470.3)

Acknowledgement and Agreement to Participate in the Human Reliability Program (DOE F 470.4)

Authorization and Consent to Release Human Reliability Program (HRP) Records in Connection with HRP (DOE F 470.5)

Human Reliability Program (HRP) Alcohol Testing Form (DOE F 470.7)

Human Reliability Program (HRP) Alcohol Testing Form (DOE F 470.12) LANL Use Only

A.1. Legal Justification

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 information collection.

The collection of this information from government contractors is necessary to ensure that individuals who occupy positions affording access to certain materials, nuclear explosive devices, facilities, and programs meet the highest standards of reliability and physical and mental suitability. This objective is accomplished through a system of continuous evaluation that identifies individuals whose judgment and reliability may be impaired by physical or mental/personality disorders, alcohol abuse, use of illegal drugs, the abuse of legal drugs or other substances, or any other condition or circumstance that may be of a security or safety concern.

The basic authority for these collections is the statute establishing the Department of Energy (“Department of Energy Organization Act”, Public Law 95-91, of August 4, 1977) which vests the

Secretary of Energy with the executive direction and management functions, authority and responsibilities for the Department, including contract management. The provisions of 42 U.S.C. 7254 state that “The Secretary is authorized to prescribe such procedural and administrative rules as he may deem necessary or appropriate to administer and manage the functions now or hereafter vested in him”; and 42 U.S.C. 7256(a) state “The Secretary is authorized to enter into and perform such contracts, leases, cooperative agreements, or other similar transactions with public agencies and private organizations and persons, and to make such payments (in lump sum or installments, and by way of advance or reimbursement) as he may deem to be necessary or appropriate to carry out functions now or hereafter vested in the Secretary.”

It should be noted that the costs incurred by DOE contractors in providing the information collections in this package are recovered in their contract fees and payments. In this sense, they differ from information collections imposed on the general public for which no cost reimbursement is provided. In addition, M&O contractors provide input concerning information collection requirements during contract negotiation. In this regard, they have agreed that the resulting information collections are required for the administration of these contracts and are accepted as a normal business practice. Finally, DOE is most interested in keeping the reporting burden at a minimum to reduce expenditures, therefore, only basic management and program-type information is collected from contractors to properly manage these contracts and carry out the myriad statutory and other missions of the Department requiring contractor support.

A.2. Needs and Uses of Data

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.

As noted above, the information obtained from DOE contractors is necessary to ensure that individuals who occupy positions affording access to certain materials, nuclear explosive devices, facilities, and programs meet the highest standards of reliability and physical and mental suitability. This objective is accomplished through a system of continuous evaluation that identifies individuals whose judgment and reliability may be impaired by physical or mental/personality disorders, alcohol abuse, use of illegal drugs, the abuse of legal drugs or other substances, or any other condition or circumstance that may be of a security or safety concern.

The information collected on the forms below is used by the Department to ensure that individuals who occupy positions affording access to certain materials, nuclear explosive devices, facilities, and programs meet the highest standards of reliability and physical and mental suitability.

Human Reliability Program Certification (DOE F 470.3) - The data on this form is being collected to certify participation in the Human Reliability Program. The Department uses this data to ensure that the role holders on this form certify that the applicant/participant does not represent a security or safety concern based on their knowledge of the applicant/participant or a review of medical documents.

Acknowledgement and Agreement to Participate in the Human Reliability Program (DOE F 470.4) - This data on this form is being collected as an acknowledgment and agreement to participation in the Human Reliability Program. The Department uses this data to ensure the participants acknowledges their participation and understands the requirements.

Authorization and Consent to Release Human Reliability Program (HRP) Records in Connection with HRP (DOE F 470.5) - This data is being collected as authorization and consent that the participant understands the records that will be generated by their participation in the program, how those records will be handled and that those records may be released. The Department uses this data to ensure the applicant/participant provided authorization and consent before releasing any HRP records.

Human Reliability Program (HRP) Alcohol Testing Form (DOE F 470.7) - This data is being collected to administer an alcohol test. The Department uses this data to measure any alcohol in the employee's breath to determine if the employee can perform HRP related duties. This is used to test for the following reasons: Random, Reasonable Suspicion, Post-Accident, Return to Duty, Follow-Up or Pre-Employment.

Human Reliability Program (HRP) Alcohol Testing Form (DOE F 470.12) - This form was created as the current HRP Alcohol Testing Form (DOE F 470.7) does not fit the pre-specified template used by LANL to administer and print the alcohol test and results. DOE F 470.12 collects the same data collected in DOE F 470.7, but the format has been altered to fit the needs of LANL.

A.3. Use of Technology

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.

Within existing budget and resource constraints, Department program managers and contractors continually work to apply the latest appropriate-level information technology (hardware and software) to reduce the contractors' burden and improve the timeliness and usefulness of the management information being collected. This includes automation of previously manual processes where appropriate. The forms included in this collection primarily require only individuals' signatures and date information. Three of the four forms are fillable, allow for electronic signature and can be transmitted electronically via e-mail making them 100% electronic. The exception is DOE F 470.7. DOE F 470.7 is fillable and allows for electronic signature but once the alcohol technician affixes the results to the form it may no longer be submitted electronically since it must be affixed with tamper evident tape.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

Since the information contained in this package is applicable only to the DOE internal program for which the information is collected, meaningful duplication of these collections at DOE or in other agencies is unlikely.

A.5. Provisions for Reducing Burden on Small Businesses

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

The impact of the collection of information on small businesses is considered in the development of the contract requirements and documents and is minimized to the extent permitted by applicable statutory requirements and other legal and management constraints.

A.6. Consequences of Less-Frequent Reporting

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.

The frequency of collection is dictated by sound management practices, external laws and regulations, requirements of interagency reports, and Departmental orders and requirements. Currently this is collected annually or for cause based on a reasonable suspicion. When any of these conditions change to permit reduction of the frequency of information collections, the reduction is made and the contract documents are changed accordingly.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:

- (a) requiring respondents to report information to the agency more often than quarterly;**
- (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- (c) requiring respondents to submit more than an original and two copies of any document;**
- (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;**
- (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;**
- (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- (g) that includes a pledge of confidentiality that is not supported by authority established in stature of 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**
- (h) 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 none. The package is consistent with OMB guidelines.

A.8. Summary of Consultations Outside of the Agency

If applicable, provide a copy and identify the date and page number of the publication in the Federal Register of the agency's notice, required by 5CFR 320.8(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 in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on May 23, 2022, volume 87, number 99, page 31222. The Notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received. We have not consulted with anyone outside of DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

A.9. Payments or Gifts to Respondents

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

There is no remuneration given for submission of any of the information other than the expense of responding, which is treated as an allowable cost for contractors.

A.10. Provisions for Protection of Information

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Where sensitive and/or confidential information is involved in an information collection, the provisions for dealing with this confidential information are set forth in the contract documents and the related Departmental regulations and are normal to the handling of management and program information by the Department.

A.11. Justification for Sensitive Questions

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 DOE 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.

The information collected by DOE does not include anything of a sensitive nature.

A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

The estimated burden hours are the sum of the burden reported by Departmental elements and field organizations as compiled from their respective contractors or estimated by expert personnel familiar with these collections.

Total Number of Unduplicated Respondents: 41,321

Reports Filed per Person: 4.005126

Total Annual Responses: 41,365

Total Annual Burden Hours: 4,610

Average Burden per Collection: 0.399989097 hr

Average Burden per Applicant: 0.400398722 hr

Table A1. Estimated Respondent Hour Burden

Collection Instrument	Number of Respondents	Annual Responses	Burden Hours Per Response (shown in minutes)	Annual Burden Hours	Reports per respondent
DOE F 470.3	8,876	8,892	10	1,482	1.001798
DOE F 470.4	8,551	8,561	2	285	1.00121
.0166DOE F 470.5	8,551	8,569	2	286	1.002121
DOE F 470.7	12673	12673	10	2112	1
DOE F 470.12	2670	2670	10	445	1
Total	41,321	41,365		4,610	

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.

Costs associated with DOE contractor employees approximately \$405,680. See breakdown of costs in table below. Wages were obtained from BLS data released June 16, 2022, using Industry and Occupational Group; Service-Providing Industries; Professional and Business Services Industry; Professional, Scientific and Technical Services Industry which is \$62.75. This rate fully burdened with benefits is \$87.85 rounded to \$88.

Table A2. Estimated Respondent Cost Burden

Collection Instrument	Estimated Annual Burden Hours	Hourly Wage Rate	Estimated Costs to Respondents
DOE F 470.3	1,482	\$88	\$130,416.00
DOE F 470.4	285	\$88	\$25,080.00
DOE F 470.5	286	\$88	\$25,168.00
DOE F 470.7/470.12	2,557	\$88	\$225,016.00
Total	4,610		\$405,680.00

A.13. Other Estimated Annual Cost to Respondents

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

There are no costs to respondents or recordkeepers other than those given in Section A12B.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

There is a cost of approximately \$2,542 associated with this collection that will impact the Federal government. The HRP Manager spends 1% (20.8 hours) of their time on this collection. Calculating a loaded salary of $\$254,231 \times 1\% = \$2,542$. Salary is based on the HRP Manger salary plus 29% benefits and 30% overhead.

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

This program now has a new program manager who believes the number of respondents and responses provided in Table A1 previously included all participants in the program. Approximately 5-10 percent of participants in this program at any given time are federal employees so the previous numbers would have erroneously included federal employees. The responses also vary based on the number of participants employed with our contactors. The burden hours for DOE F 470.7/DOE F 470.12 were re-evaluated and has changed from six to ten minutes resulting in an increase to our burden hours. The change in our costs burden is an overall increase based on the increased burden hours of DOE F 470.7/DOE F 470.12.

Table A3. ICR Summary of Burden

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	41,365		-2,634	43,999
Total Time Burden (Hr)	4,610		791	3,819
Total Cost Burden	\$405,680		73,427	\$332,253

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

This package contains no collections for which results will be published for statistical use.

A.17. OMB Number and Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The Department is not seeking approval to not display the expiration date for OMB approval of this information collection.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

The Department is not requesting any exceptions to the certification statement provided in Item 19 of OMB Form 83-I.