

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSIONS**

**Title 29 CFR Part 29
Apprenticeship Programs - Labor Standards for Registration**

A. 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 of each regulation mandating or authorizing the collection of information.**

The National Apprenticeship Act of 1937, Section 50 (29 U.S.C. 50), authorizes and directs the Secretary of Labor "to formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices, to extend the application of such standards by encouraging the inclusion thereof in contracts of apprenticeship, to bring together employers and labor for the formulation of programs of apprenticeship, to cooperate with State agencies engaged in the formulation and promotion of standards of apprenticeship, and to cooperate with the Secretary of Education in accordance with Section 17 of Title 20." Section 50a of the Act authorizes the Secretary of Labor to "publish information relating to existing and proposed labor standards of apprenticeship," and to "appoint national advisory committees..." (29 U.S.C. 50a). (See Attachment 1 for a copy of the Act, the current Statute, which is located at <http://www.doleta.gov/OA/fitzact.cfm>. The Historical Statute is also attached.)

The purpose of Title 29 CFR Part 29 is to set forth labor standards to safeguard the welfare of apprentices, and to extend the application of such standards by prescribing policies and procedures concerning registration, for certain Federal purposes, of acceptable apprenticeship programs with the U.S. Department of Labor, Employment and Training Administration, Office of Apprenticeship, (OA), formerly known as the Office of Apprenticeship Training, Employer and Labor Services and also the Bureau of Apprenticeship and Training. These labor standards, policies, and procedures cover the registration and cancellation of apprenticeship programs and of apprenticeship agreements; the recognition of a State agency as the appropriate agency for registering local apprenticeship programs for certain Federal purposes; and related matters.

Description of the collection instrument:

This collection instrument has two sections, one for program sponsor's information (Section I) and one for apprentice's information (Section II) that are available on paper and electronic formats. These sections are used at different times, for different purposes, and with different individuals or entities. The information collected is not duplicative. The Apprenticeship and Training Representative (ATR) will be available upon request to provide full technical assistance and services to those sponsors and apprentices who do not have computer technology available.

The main headings in the ETA-671, Program Registration - Section I instrument are as follows: Program Sponsor Information, Program Registration Information, Program Sponsor's Related Contact Information, Journeyworkers Employed, Related Technical Instruction (RTI) Information, RTI Source Information, Program Sponsor's and Apprenticeship and Training Representative's signature. The information requested under most of these headings is routine information such as identification of the entities, their addresses, telephone numbers, e-mail addresses, fax numbers, and web-site addresses. Non-routine exceptions where additional information is requested are under Program Registration Information (11 of 22 fields), Journeyworkers Employed (29 of 29 data fields), Related Technical Instruction (RTI) Information (5 of 7 data fields), RTI Source Information (2 of 8 data fields), and Apprenticeship and Training Representative (16 of 18 fields). This information is collected on an occasional basis but not more than once per year. Definitions and Instructions, pages 3-4, are also included.

The main headings in the ETA-671, Apprentice Registration - Section II, instrument are as follows: Part A requests personal apprentice characteristics information and Part B requests Sponsor Program Information. Under Part B, the ETA-671, electronic collection instrument will repopulate electronically 34 fields from the electronic Program Registration - Section I, through the redesigned Registered Apprenticeship Partners Information Data System (RAPIDS), formerly known as the Registered Apprenticeship Information System (RAIS). Part C requests information from the registration agency and includes the apprentice identification number. The information in Section II is collected on a one-time basis.

The following sections of the regulation contain information collection requirements subject to the Paperwork Reduction Act (See Attachment 2 for copy of the Title 29 CFR Part 29

regulation, which is available at [http://www.dol.gov/dol/allcfr/ETA/Title 29/Part 29/toc.htm](http://www.dol.gov/dol/allcfr/ETA/Title%2029/Part%2029/toc.htm).) Also, for reference purposes, a copy of Title 29 CFR Part 30 is under Attachment 2 which is available at [http://www.dol.gov/dol/allcfr/Title 29/Part 30/toc.htm](http://www.dol.gov/dol/allcfr/Title%2029/Part%2030/toc.htm).

- Section 29.3 (a) of Section 29.3 (a)-(i) is the overarching or dominant element in this Section. It is important because a program is eligible for various Federal purposes only if it is in agreement with the apprenticeship program standards published by the Secretary of Labor and if the program is registered with the Office of Apprenticeship (OA or a recognized State Apprenticeship Agency (SAA) or State Apprenticeship Council (SAC).
- Section 29.3 (b) provides for the registration of the program and apprentice. Program registration not only assures industry consistency relative to the skills sets of the apprenticeable occupation and the related technical instruction, it also protects the welfare of the apprentices because of this consistency and uniformity.

Section 29.3 (b) is necessary to safeguard the welfare of apprentices to ensure that the program is providing equal employment opportunities. If the information under 29.3 (b) were not collected, there would be no formal agreement or registration between the sponsor and the Office of Apprenticeship or the State Apprenticeship Agency or Council and there would, therefore, not be a formal apprenticeship program.

- Section 29.3 (c) (1) provides for the registration of apprentices to assure the individuals receive the proper agreed upon skilled training and to make possible the granting of recognition to the individuals for the training received.
- Section 29.3 (c) (2) allows for the filing of a list of apprentices rather than individual agreements.
- Section 29.3 (d) is necessary where a list is used to permit certification that a specific employee is eligible for probationary employment.
- Section 29.3 (e) is necessary to safeguard the welfare of apprentices to ensure that they have not been terminated unjustly, to provide a check for the quality of the program, and to appropriately recognize those that complete the training program.

- Section 29.3 (g) also is necessary to ensure that program modifications do not adversely affect apprentices from receiving proper training in accordance with agreed upon standards and to ensure that programs include up-to-date technological changes so that apprentices will receive training current for their trade.
- Section 29.3 (h) is important because the Act calls for bringing together employers and labor for the formulation of programs of apprenticeship, and it is necessary to ascertain that all appropriate parties are properly involved in the training. This requirement also serves to protect the welfare of the apprentice by ensuring proper representation of employees in training matters.
- Section 29.3 (i) is necessary to ensure that programs proposed by an employer or groups of employers have the same opportunity for program registration as those proposed programs with collective bargaining agents. It is necessary to ascertain that all employers are properly involved in the training. It also safeguards the welfare of the apprentice by increasing the choices of program selection by an apprentice.

29.6 Apprenticeship Agreement.

Section 29.6 requires specific information necessary to protect the welfare of apprentices and ensure proper wages and training (on-the-job and related instruction), various work processes are provided, proper probationary periods are permitted, and equal employment opportunity is ensured.

29.5 Standards of Apprenticeship

This section describes those standards appropriate and necessary to ensure that apprentices receive the proper training for their skilled trades. The attached copy of the regulation, Title 29 CFR Part 29, (Attachment 2) includes a listing of those standards that program sponsors must be fully aware of and agree to meet these standards.

29.12 Recognition of State agencies.

(a) (1)-(5), (b), (c) and (d)

The National Apprenticeship Act calls for cooperation with State Apprenticeship Agencies (SAAs) engaged in the formulation and development of standards of apprenticeship. This section deals with the recognition of the State agency

by the Secretary of Labor for Federal purposes and as such certain information needs to be submitted to and approved by the Secretary. It also contains provisions for appeals from denials of recognition.

29.13 Derecognition of State agencies.

Section 29.13(f), requiring the notification of all apprentices that recognition for Federal purposes has been withdrawn, serves to safeguard and protect their welfare.

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.**

29.3 and 29.6

The information to be collected on the "Program Registration - Section I" and Apprenticeship Registration - Section II" (Attachment 3) for registration of the program and of the apprentice, is as follows:

For program registration, the typist of the sponsor will enter the information electronically on the first two pages. The third and fourth pages consist of definitions and/or instructions to assist the sponsor in completing the rest of this instrument. The ATR will review this information for compliance before approving it for entry into RAPIDS, the apprenticeship database.. The ATR will periodically review the information, primarily, for changes to the information previously collected, e.g., active or inactive program, addition or deletion of a school-to-registered apprenticeship sponsor, related technical instruction provider (Attachment 3). This information needs to be collected to ensure that the program is in conformity with the Title 29 CFR Part 29.1(b) regulation so that the program can continue to be registered and the welfare of the apprentice is maintained.

To register the apprentice, the typist of the program sponsor will enter the information electronically on the first page of Section II. The reverse side contains definitions and instructions on those data elements that are not self-explanatory as requested previously by OMB. The ATR will review this information for compliance before approving it for entry into RAPIDS. The ATR will periodically review the information to ensure that the apprentice is receiving the appropriate training and to document all aspects of training that have been agreed to by the individual apprentice and the sponsor (Attachment 3). If this information was not collected, there would be no formal

agreement or registration between the sponsor and the apprentice and, therefore, no formal apprenticeship program.

The ATR will be available upon request to provide full technical assistance and services to those program sponsors and apprentices who do not have computer technology available.

Summary information is used to respond to requests from senior management, Congress, public interest groups, the apprenticeship sponsor community, and the general public.

Additional changes and/or additions to the collection of information in this request include:

a. Program Registration - Section I

- a.1) Employer Identification Number (EIN). The EINs of all registered program sponsors will be requested on a voluntary (optional) basis. The EIN is an Internal Revenue Service Federal Tax identification number that is used to identify a business entity. Employers who enter their EIN during apprenticeship program registration are verifying that their businesses are legitimate with intentions of maintaining a registered program and training apprentices. This quality assurance check protects the welfare of the apprentice. The EINs for previously registered programs will be requested on a voluntary (optional) basis during periodic reviews which are not more than once on a yearly basis. Collecting the EIN further enhances current OA's quality control procedures in place.
- a.2) As indicated in Item 1, most of the information collection is routine, non-burdensome, such as the identification of the entities, their addresses, telephone numbers, e-mail addresses, fax numbers, and web-site addresses.

Non-routine exceptions where additional information is requested are under Program Registration Information (11 of 22 data fields), Journeyworkers Employed (29 of 29 data fields), Related Technical Instruction (RTI) Information (5 of 7 data fields), RTI Source Information (2 of 8 data fields), and Apprenticeship and Training Representative (16 of 18 data fields). Definitions and Instructions, pages 3-4, are also included.

The instrument consists of four pages of which two pages are for data field entries and two pages are for Definitions and/or Instructions.

- a.3) Collection of data on new programs registered to ensure accurate and consistent data for all registered programs captured in the re-designed database, RAPIDS, and to be in conformance with the Workforce Investment Act Reauthorization.
- b. Apprenticeship Agreement - Section II
 - b.1) "Trade Adjustment Assistance" and "YouthBuild" additions in Item 7., Career linkage or Direct Entry to track and align this category with the Department's strategic goal under the Government Performance and Results Act "GPRA", 1.1. A Prepared Workforce (07-1D Strengthen the registered apprenticeship system to meet the training needs of business and workers in the 21st Century, US Department of Labor 2007 Performance and Accountability Report), and to integrate apprenticeship with the Workforce Investment and Wagner-Peyser Acts.
 - b.2) Apprentice Social Security Number Request, Box 1, page 2. The justification for collecting the apprentice's social security number was updated to clarify that the number is encrypted in RAPIDS and that RAPIDS generates a unique number to identify the apprentice. It replaces the social security number to protect the apprentice's privacy. The apprentice's social security number is only used and required for GPRA purposes to determine program outcomes of retention and wage gains related to the common measures of Federal job training and employment programs.
 - b.3) Additional instructions in each section on those data elements which are not self-explanatory as requested previously by OMB.
 - b.4) In the "public protection" area, the estimated average response time change for Apprentices Registration, Section II, is decreased from 15 minutes to 5 minutes.

29.5

Apprenticeship standards are required by Title 29 CFR 29.5 for sponsors to have a registered apprenticeship program. These standards include an on-the-job training outline, related instruction curriculum, and the apprenticeship operating procedures. Standards are incorporated by reference in the Apprentice Registration -Section II,

because the standards outline all the conditions for the recruitment, selection, employment, and training of apprentices to which all parties to the Apprenticeship Agreement are agreeing. A formal registered apprenticeship program could not exist without the standards of apprenticeship. The ATR will be available upon request to provide full technical assistance and services to those program sponsors who do not have computer technology available.

29.12 (a) (1)-(5), (b), (c) and (d)

The information is submitted by the SAA seeking recognition from the Secretary for Federal purposes related to apprenticeship. It is reviewed to determine that the policy and procedures of the state conform to the minimum standards established by the regulations. Submitted information is also reviewed and analyzed to determine whether the agency should be recognized to act as agent for the Secretary. Item 22 of ETA-Section II identifies the registration agency.

29.13 (f)

The requirement directs the program sponsor to notify all registered apprentices that Federal recognition of the program has been withdrawn. Such notification is important so that the apprentices fully understand that all the benefits to them of such Federal recognition will no longer exist, and they may take appropriate action to protect their interest. Not having such a requirement would be detrimental to the best interest of the apprentices and would not serve to protect their welfare as legislatively mandated.

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.**

29.3 and 29.6

Consideration has been given to reduce the reporting burden by modifying the Apprentice Registration - Section II instrument, which has been revised a number of times in the past, and utilizing on-line data systems for more efficient program and apprentice registration processes.

The first prototype of RAPIDS was launched in February 2002.

Since then, new transaction and reporting systems as well as new tables and new data entry screens to input and update information are still being modified to support the database system.

ETA has implemented an electronic apprentice registration process consistent with the Government Paperwork Elimination Act and E-Government requirements. ETA now proposes to implement an electronic program registration process through its re-engineered, RAPIDS. These are additional tools to assist sponsors and apprentices in the registration processes and improve data reporting capabilities. The ATR will be available upon request to provide full technical assistance and services to those program sponsors and apprentices who do not have computer technology available.

The e-program registration component complements the current Apprentice Electronic Registration (AER) process approved by OMB. As of Fiscal Year 2007, 50 percent of all apprentices were registered through the AER process. With the re-engineering of RAPIDS, the electronic registration of apprentices and now the electronic registration of programs, OA is implementing the Government Accountability's Office recommendation to improve and focus its program data to target resources that will address and remedy areas in need of assistance.

29.5

Consideration has been given to the use of improved information technology to reduce the burden. National Guideline Standards and National Standards have been developed and new ones are continually being developed to provide for local adaptation merely by copying and/or modifying to the extent appropriate the standards which are now available electronically. The ATR will be available upon request to provide full technical assistance and services to those program sponsors who do not have computer technology available.

29.12 (a) (1)-(5), (b), (c) and (d)

Any improved information technology to reduce the burden is at the option of the respondent States.

29.13 (f)

Method of notifying apprentices is at the option of the sponsor.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in 2 above.

Not applicable. Data is not otherwise collected.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The information collected under Title 29 CFR Part 29 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.

The registration of apprenticeship programs and apprentices is necessary to carry out the requirements of the National Apprenticeship Act. Program registration information is reviewed periodically but not more than once on a yearly basis. Apprentice information is only submitted on a one-time basis and therefore, the collection frequency in this section cannot be further reduced.

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 secret, 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.

Data collection and retention is consistent with 5 CFR 1320.5. However, a records retention requirement of five years is necessary because the duration of many apprenticeship programs is four years or more, and it is important to keep the records for a period of time after an apprentice has left the program. The National Archives and Records Administration approved the Request for Records Disposition Authority from the Office of Apprenticeship on January 11, 2007 (NI-369-06-01, National Guidelines, Case Files and Circulars).

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. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency 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 reported.

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 copy of the Federal Register notice, Vol. 73, No 126, Monday, June 30, 2008, page 36903 of the "Proposed Collection; Comment Request" is attached. No Comments to this notice were received.

Also, ETA has been in contact with sponsors/employers and other interested groups on a regular basis and to date no adverse comments have been received regarding these reporting requirements.

A representative from the Department of Education serves as an ex-officio member of the Secretary's Advisory Committee on Apprenticeship. This committee provides guidance related to apprenticeship matters.

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

Other than remuneration of contractors or grantees, no payments or gifts are made to respondents.

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

29.3 and 29.6

The Privacy Act Statement will continue to be printed on the reverse side of the Apprenticeship Agreement Section II (Attachment 3). The Social Security Number is requested to facilitate securing accurate, consistent and uniform retention and wage data from Unemployment Insurance Wage Records via the Wage Record Interchange System (WRIS). This information will be used to determine OA's program performance outcomes of retention and wage gains related to the common measure of Federal job training and employment programs of the Employment and Training Administration and according to the Office of Management and Budget. Also included is a statement that informs the apprentice where the information he/she has provided on the collection instrument is stored, name of the system and location of the system, and that the information is protected in accordance with the Privacy Act. No confidential information is requested in the other sections.

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.

No information is collected that is considered to be of a sensitive nature.

12. 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, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

- 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 in Item 14.

29.3 and 29.6

Latest available data (RAPIDS FY 2007 database) indicates there are more than 27,000 registered apprenticeship programs. Based on recent fiscal yearly data, it is estimated that 1,500 new programs were registered by Federal staff and that the average response time for new program registrations will remain as last approved at 10 minutes for a total of 249 hours (1,500 x .166). It is necessary to collect and capture uniform and consistent data associated with all new program registrations. In addition, the information is useful to determine trends in program development. Information on Program Registration - Section I is reviewed periodically but not more than once on a yearly basis. The respondent cost is \$3,984 (29.3) (249 hours x \$16).

{The \$16 mean hourly rate (rounded to the nearest dollar) for the program sponsor's typist was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Wages in the United States, June 2006, Word Processors and typists, p. 15, Summary 07-03, June 2007.}

Experience has shown that each one of these sponsors responds at least once a year with information on new apprentices, completions, or terminations. It is estimated based upon the most recent data from FY 2007 RAPIDS that system-wide about 206,000 new apprentices were registered and that there were about 151,000 completions and terminations. In calculating the estimates, OA will use Federal workload data obtained from the RAPIDS 2007 Report. Estimated new apprentice registrations were 144,000 and apprentice completions and cancellations were 100,000. Due to the implementation of Form 671 on RAPIDS, with the pre-population of Section II, the average response time will change to 5 minutes (or fewer) from 15 minutes for new apprentice registrations, completions, and cancellations as follows: 11,952 hours (144,000 x .083), and 8,300 hours (100,000 x .083), respectively.

The respondent cost is \$191,232 (29.3) (11,952 hrs. x \$16) and \$132,800 (29.6) (8,300 hrs. x \$16) for a total of \$324,032 (\$191,232 + \$132,800).

{The \$16 mean hourly rate (rounded to the nearest dollar) for the program sponsor's typist was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Wages in the United States, June 2006, Word Processors and typists, p. 15, Summary 07-03, June 2007.}

29.5

Based upon latest available data, more than 3,000 respondents per year make an annual response system-wide {Standards (plan)}. Of this total, approximately, 1,500 programs were registered by Federal staff. Experience shows that this activity takes two hours per sponsor = 3,000 hours.

The respondent cost is \$93,000 (3,000 hrs. x \$31).

{The \$31 mean hourly rate (rounded to the nearest dollar) for the sponsor was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Wages in the United States, June 2006, Training and development managers, p. 4, Summary 07-03, June 2007.}

As of January 31, 2008, there are 25 state apprenticeship agencies/councils (SACs), 2 territories (Puerto Rico and the Virgin Islands) and the District of Columbia delegated the responsibility by the Secretary of Labor to review/update the standards; thus, performing similar functions as the GS-12 Federal Representatives (ATRs) of OA. Experience indicates this takes two hours per sponsor at the cost of \$26 per hour (State employee). The annualized cost to the registration agency is \$83,200 (1,600 x 2 hrs. = 3,200 hrs. x \$26).

{The \$26 mean hourly rate (rounded to the nearest dollar) for the SAC Apprenticeship Training Representative was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Wages in the United States, June 2006, Human Resources, training and labor relations specialists, p. 4, Summary 07-03, June 2007.}

29.12 (a) (1)-(5), (b), (c) and (d)

Twenty-five SACs, 2 territories (Puerto Rico and the Virgin Islands), and the District of Columbia filed a one-time submission of necessary materials for recognition. No new State agencies are expected in Fiscal Years 2008-2011. However, due to reduced state resources, other SACs may decide to transfer their delegated responsibilities to OA. On January 31, 2007, the Department of Labor's Administrative Review Board (ARB) issued a Decision and Order that withdrew recognition of the California SAC for

federal purposes. Pursuant to the ARB's Decision and apprenticeship regulations codified in Title 29, CFR Part 29, OA was required to take direct responsibility for certifying and overseeing the California registered apprenticeship programs that sought Federal registration by March 2, 2007.

On a yearly basis, the state's costs involved are for compiling and submitting information affecting their recognition status such as state apprenticeship law, copies of the state council composition, state plan for Equal Employment Opportunities in Apprenticeship, description of basic standards for program registration, and a description of policy and operating procedures. Essentially, this is merely compiling and mailing of the above-referred-to materials (28 SACs x 2 hours per response = 56 hours), and is a minimal cost. Such cost is estimated to be \$1,456 (28 SACs x 2 hours x \$26). Consideration in arriving at this annualized cost is limited to the submission of the information and assumes that the state, in its own desire to have an apprenticeship agency/council, has already taken all the necessary actions and prepared all the required documents for the conduct of their own apprenticeship program.

29.13 (f)

Colorado and New Hampshire requested the withdrawal of their status as delegated apprenticeship agencies/councils. California was derecognized as a state agency. Under this section, the states were required to notify registered apprentices of their status for Federal purposes in the event the states did not become what is known as Federal registration states, which they became. Therefore, the apprentices remained covered under any Federal provision applicable to his/her individual registration under a program recognized or registered by the Secretary of Labor for Federal purposes.

The total burden is summarized in the following table.

Requirement ETA Form 671	Sec.	Total Respondents	Frequency	Annual Response	Average Response Time	Annual Burden Hours
Section I	29.3	1,500	1-time basis	1,500	.166 hr/ Sponsor	249 Hrs.
Section II	29.3	144,000	1-time basis	144,000	.083 hr./ apprentice	11,952 Hrs.
"	29.6	100,000	1-time basis	100,000	.083 hr./ apprentice	8,300 Hrs.
"	29.5	1,500	1-time basis	1,500	2 hrs./ spon	3,000 hrs.
"		1,600	1-time basis	1,600	2 hrs./ SAC	3,200 Hrs.
"	29.12	(30)	1-time basis	(30)	0 hrs.	0 Hrs.
"	29.12 (accomplished in 1977; no new state agency expected in 2008)					
"	29.12	28	1-time basis	28	2 hrs. SAC	56 Hrs.
"	29.13	0	1-time basis	0	0	0
"	Totals	248,728		248,728		26,757

TOTAL RESPONDENTS: 248,728 (3,100 sponsors + 244,000 apprentices
+ 1,628 SACs)

TOTAL BURDEN Hours: 26,757 (3,249 sponsors + 20,252 apprentices + 3,256
SACs)

Burden estimates are experience-based.

Ending Summary:

<u>Section</u>	<u>Total Cost</u>
29.3	3,984
29.3	191,232
29.6	132,800
29.5	93,000
29.5	83,200
29.12	1,456
29.13	---
Total Respondent Cost	\$505,672

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no additional costs other than those mentioned in Number 12 above.

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

29.3 and 29.6

The burden to the Federal Government based on the GS-12/6 salary of \$37 per hour (rounded to the nearest dollar from OPM General Schedule, for the Locality Pay Area of the Rest of U.S., effective January 2008) is primarily for reviewing the materials submitted by the sponsors, processing these including inputting data in the database and returning copies to sponsors and other partners, as appropriate. For new apprenticeship program electronic registrations, the process is estimated to take 10 minutes. The annualized cost to the Federal Government for new program registrations is \$9,250 (1,500 x 10 minutes = 15,000; 15,000 divided by 60 minutes = 250 hrs.; 250 hrs. x \$37 = \$9,250). Estimated annualized cost per program registration is \$6.17 (\$9,250 divided by 1,500). For new apprenticeship agreements, the process is estimated to take five minutes. The annualized cost to the Federal Government for new apprentice registrations is \$444,000 (144,000 x 5 minutes = 720,000; 720,000 divided by 60 minutes = 12,000 hrs.; 12,000 hrs. x \$37 = \$444,000). Estimated annualized cost per apprentice is \$3.08 (\$444,000 divided by 144,000). Also, it is estimated that it takes about five minutes to process approximately 100,000 terminations and completions per year. Total annualized cost to the Federal Government is \$308,321 (100,000 x 5 minutes = 500,000; 500,000 divided by 60 minutes = 8,333 hrs. (8,333 x \$37 = \$308,321). Estimated annualized cost per apprentice terminations and completions is \$3.08 (\$308,321 divided by 100,000).

Total annualized cost for all apprentice actions is \$761,571 (\$9,250 + \$444,000 + \$308,321)

Cost: \$761,571 -- Federal.

29.5

There are more than 950 trades/occupations that are recognized as apprenticeable. Each of these trades has a

set of apprenticeship standards. Once the standards are developed for a particular trade, they may be reused with minor modifications by program sponsors adapting as necessary to their own requirements. The staff of the registration agency provide extensive technical assistance to sponsors in the development and revision of their programs. The apprenticeship standards for an individual sponsor are developed on a one-time basis and are modified periodically, based upon changing requirements, such as changes in the collective bargaining agreement, major technological changes require changes in work processes and related training. Approximately, 1,500 new programs are registered each year, the majority of which basically use previously developed apprenticeship standards. The burden upon the respondents consists mostly of reviewing apprenticeship standards with the government representative and the apprentice, making minor modifications as necessary and formally agreeing to them. The cost to the Federal Government is approximately \$111,000 (1,500 x 2 hours x \$37).

Cost: \$111,000-- Federal.

29.12 (a) (1)-(5), (b), (c) and (d)

Federal annualized cost, which is on a one-time basis, is estimated at \$4,816 (28 SACs x 4 hours x \$43 hourly wage of GS-13/5 according to OPM General Schedule, for the Locality Pay Area of the Rest of U.S., effective January 2008). This figure is based on the on-site reviews conducted by the Office of Apprenticeship State Directors of the records and procedures of the 28 apprenticeship agencies/councils.

Cost: \$4,816 -- Federal.

29.13 (f)

There is no cost to the Federal Government.

Total Cost

29.3 and 29.6	\$761,571
29.5	111,000
29.12	4,816
29.13	-----
TOTAL (all sections)	\$877,387

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

The decrease of burden hours from 55,632 to 26,757 is due to the response time change from 15 minutes to 5 (or fewer) minutes in the Apprentice Registration - Section II instrument as well as to the reduction in applicants/sponsors. The decrease in respondents is due to a diminished number of applicants/sponsors. The decrease in time for completing Section II is due to the implementation of Form 671 on RAPIDS, which provides for pre-population of Section II.

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.

Summary information is used to respond to requests from senior management, Congress, public interest groups, the apprenticeship sponsor community, and the general public.

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.

ETA is not requesting a waiver for the display of the OMB expiration date. It will be displayed on the form and in any ETA/OATELS issuances.

18. Explain each exception to the certification statement identified in Item 19. "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions.

B. Collections of Information Employing Statistical Methods.

The collection of information does not employ statistical methods.