

**OCCUPATIONAL SAFETY AND HEALTH INFORMATION NEEDS AND USES BY
TRADE ASSOCIATIONS AND LABOR UNIONS WITHIN
EIGHT INDUSTRIAL SECTORS**

**Request for the Office of Management and Budget Review and
Approval for Federally Sponsored Data Collection**

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A. Justification

1. Circumstances Making the Collection of Information Necessary

As mandated in the Occupational Safety and Health Act of 1970 (PL 91-596), the mission of the National Institute for Occupational Safety and Health (NIOSH) is to conduct research and investigations on work-related disease and injury and to disseminate information for preventing identified workplace hazards (Section 20 (a) (1) and (d) (Appendix A). This dual responsibility recognizes the need to translate research into workplace applications to impact worker safety and well-being. Indeed, NIOSH through its communication efforts seeks to promote greater awareness of occupational hazards and their control, shape the national occupational safety and health research priorities, change organizational practices and individual behavior, and ultimately, improve the American working life. Business-oriented trade associations, professional-oriented trade associations, and labor unions are known to be powerful resources for providing information, including occupational safety and health information, to their members whether they are companies or individuals.

Through this data collection, NIOSH will collect information addressing how business- and professional-oriented trade associations and labor unions communicate with their members, the workplace safety and health needs and concerns of these organizations, and whether these organization know of and use NIOSH or other occupational safety and health information. This information collection supports the NIOSH 2004-2009 Strategic Plan by acknowledging its intention to “promote safe and healthy workplaces through interventions, recommendations and capacity building” (Goal #2) and will also fulfill one of our Program Assessment Rating Tool (PART) goals.

NIOSH proposes to obtain information from business-oriented trade associations, professional-oriented trade associations, and labor unions that represent each of the eight NIOSH National Occupational Research Agenda (NORA) industrial sectors. These sectors include Agriculture, Forestry and Fishing; Construction; Healthcare and Social Assistance; Manufacturing; Mining; Services except Healthcare and Social Assistance; Warehousing Transportation and Utilities; and Wholesale and Retail Trade. The goal of this information collection is to determine: (a) the occupational safety and health (OSH) information presently being disseminated by these organizations to their members; (b) channels of communication within these organizations used to disseminate information, including OSH information; (c) the sources of OSH information presently used by these organizations; (d) their needs for specific types of OSH information, especially those needs not presently being serviced; (e) OSH concerns of the associations and labor unions; (f) awareness and perception of NIOSH as a source of OSH information; (g) use of NIOSH information services (Website, printed publications, 800#, etc.); (h) usefulness of NIOSH information to address their OSH concerns; and (i) credibility of NIOSH as trusted source of occupational safety and health information.

2. Purpose and Use of Information Collection

This will be the first opportunity for NIOSH to systematically obtain information about occupational safety and health information distribution and use from business- and professional-oriented trade associations and labor unions within all eight NORA industrial sectors. Specifically, the data collection is designed to answer the following questions:

- (1) Which channels of communication are currently used by business- and professional-oriented trade associations and labor unions to disseminate information, including workplace safety and health information?
- (2) What sources of workplace safety and health information are currently being used by these associations and labor unions within each of the industrial sectors?
- (3) What workplace safety and health information is presently being disseminated by these associations and labor unions to their members?
- (4) What are the needs for specific types of workplace occupational safety and health information, especially those needs not presently being serviced?
- (5) What are the workplace safety and health concerns of business- and professional-oriented trade associations and labor unions within the various industrial sectors?
- (6) What is the perception of NIOSH as a source of workplace safety and health information?
- (7) What NIOSH information services are used (Website, printed materials, 800- number, etc)?
- (8) How useful is NIOSH information in addressing their workplace safety and health concerns?
- (9) Is NIOSH considered as a credible source of workplace safety and health information?

A survey instrument addressing the above nine topic areas has been developed for the study (Appendix B). The survey is designed in three sections. The first section asks questions that provide general information about each association or union. The second section focuses on communication channels currently being used by the associations or unions and the inclusion of workplace safety and health information. The third section focuses on knowledge of NIOSH and use of NIOSH occupational safety and health information services. Data will be collected from business- and professional-oriented trade associations and labor unions within each of the eight NIOSH NORA industrial sectors. The sampling frame of business- and professional-oriented trade associations and labor unions was ascertained from the Associations Unlimited database¹. A computer-assisted telephone interview (CATI) will be utilized to collect the survey data. The survey will be conducted by trained interviewers from the Oak Ridge Institute for

Science and Education (ORISE). There are no costs to participants beyond their time. A total of eighteen hundred and twelve business-oriented trade associations, professional-oriented trade associations, and labor unions will be contacted. The individual most responsible for workplace safety and health issues (safety and health professional, executive director, or general manager) at each association or union will be requested to complete the survey instrument. The estimated time to complete the survey instrument is 15 minutes.

NIOSH has a long standing history of partnering with individual trade associations and labor unions on projects designed to prevent occupational injuries and illness. However, this will be the first opportunity for NIOSH to systematically obtain information about occupational safety and health information distribution and use from associations and labor unions within all 8 NORA industrial sectors. The process of interacting with and surveying these associations and labor unions will allow NIOSH to develop a benchmark so that future efforts in partnership and communication can be measured. The ultimate desired outcome from this project is to assure that these organizations have the occupational safety and health information needed to help prevent workplace safety and health injuries and illnesses among their members.

3. Use of Improved Information Technology and Burden Reduction

The survey will be administered by trained interviewers via a computer-assisted telephone interview (CATI). The responses will be entered onto the same computer screens that provide the questions, and the software immediately stores the replies into a database. The format used to develop the study was specifically designed to reduce participant response time, effort, and burden.

4. Efforts to Identify Duplication and Use of Similar Information

The current survey will not duplicate any existing or past NIOSH work or the work of other agencies. Significant effort was spent prior to beginning this project to look for similar studies. This included utilizing two professionally trained librarians to research the literature for any studies similar to this NIOSH proposed research. None were found.

5. Impact of Small Businesses or Other Small Entities

The participants for this study will be business-oriented trade associations, professional-oriented trade associations, and labor unions. A number of these study participants may be considered small businesses or small entities. The respondent answering for the participating organization will be workplace safety and health professionals, executive directors, managers, or other staff depending on which of these personnel manage workplace safety and health issues for their organization. Although small companies may belong to these organizations, they will not be involved in any way in the survey.

1. Associations Unlimited Database, Thomson Gale, 2006

6. Consequences of Collecting the Information Less Frequently

This is a first effort of NIOSH to systematically obtain information from business- and professional-oriented trade associations and labor unions within the eight NORA industrial sectors regarding the workplace safety and health problems of their members, communication needs, information provided to members, and knowledge of NIOSH and its products and services. This study will be a benchmark for future interactions with these important target groups which will ultimately improve the safety and health of working men, women, and teens. This initial survey will be conducted one time. A follow-up survey approximately five years in the future will measure the impact of implementing recommendations derived from this baseline survey.

There are no legal obstacles to reduce the burden.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances involved in this study.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Consultation Outside the Agency

A. Federal Registry Notice

A copy of the 60-day notice in the Federal Registrar soliciting comments on the proposed study is attached (Appendix C). Published March 1, 2006 (Volume 71 Number 40, pages 10537-10538).

One comment was received in response to the Federal Registry Notice (Appendix D). The commenter mistakenly believed that this information collection was a duplication of the compliance and consultation efforts performed by OSHA. This information collection pertains to the occupational safety and health information uses and needs of trade associations and labor unions, not individual businesses. No compliance related information is being requested. A letter response was provided to the commenter (Appendix E).

B. Consultations

The following consultations contributed to development of the final survey instrument:

Grace LeMasters, Ph.D.
Professor of Epidemiology and Biostatistics
Department of Environmental Health
University of Cincinnati, College of Medicine
Cincinnati, Ohio

(513) 558-0045.

Dr. LeMasters contributed to the survey instrument design format, layout, and content. Dr. LeMasters has conducted research in epidemiology designing surveys for studies for the last twenty-five years. Dr. LeMasters is the former Chair of the Division of Epidemiology and Biostatistics in the Department of Environmental Health at the University of Cincinnati, College of Medicine.

Virginia Sublet, Ph.D.
Oak Ridge Institute for Science and Education
Oak Ridge Associated Universities
P.O. Box 117
Oak Ridge, TN 37831-0117
(407) 909-4744

Dr. Sublet conducted cognitive testing of the questionnaire with 5 individuals and pilot testing of the questionnaire with eight trade associations and one labor union that will not be included in the proposed study. Through the pilot testing, the time required to complete the survey was determined. Dr. Sublet has conducted similar work as a CDC employee or for ORISE for the past 15 years.

Jennifer Tierney Lyden
Survey Implementation Specialist
Constella Group, LLC
1003 West 7th Street, Suite 1001
Frederick, MD 21701
(301) 682-5501

Ms. Tierney Lynden evaluated the survey instrument for ease of understanding of the specific questions being asked, whether the questions fully addressed the goals of the data collection, and ease of implementing the survey through a CATI system. Ms. Tierney Lynden has experience in applying survey research methods (including data collection, questionnaire design, pre-testing methods, cognitive interviewing, and quality control) to public health studies for the Research Triangle Institute and the Constella Group, LLC for the past 7 years.

9. Explanation of Any Payment or Gift to Respondents

No financial payments or incentives will be provided to the participants.

10. Assurance of Confidentiality Provided to Respondents

This submission has been reviewed by the CDC Privacy Act Officer and it has been determined that the Privacy Act is not applicable. Respondents are trade

associations and labor unions. The data collection contractor, ORISE, will have access to the name of the individual responsible for occupational safety and health activities for the respondent entity, however, that individual will be speaking from their role and will not supply personal information. The data submitted to NIOSH will not include the name or phone number of the individuals who participated in the interviews on behalf of the respondent organizations. ORISE will delete the name and phone number upon verification that the data collection for that respondent entity is complete. The data submitted to NIOSH will include the names of the respondent organizations since only by having this information can NIOSH fulfill the ultimate goal of this project to assure that these organizations have the occupational safety and health information needed to help prevent workplace safety and health injuries and illnesses among their members. The contractor will keep all information in an electronic file stored on password-protected PC's which are locked when not in use. No one but contractor employees and the NIOSH researchers will have access to the data.

Participation in the survey is completely voluntary. NIOSH is asking that the associations and unions send a current copy of their technical journal, magazine, or newsletter but the decision to provide this information is made by participants. NIOSH would supply a self-addressed stamped envelop to send these materials so that there is no cost to participants.

NIOSH has determined that this research project does not require IRB review and approval.

11. Justification for Sensitive Questions

The survey does not contain any personal questions regarding health status, lifestyle, sexual practices or other potentially sensitive issues. Race and ethnicity data will not be collected because we are querying associations and labor groups. Some questions requesting opinions could be sensitive, but are again role-based, and individuals are reminded prior to the interview that participation is voluntary.

12. Estimates of Annualized Burden Hours and Costs

Eighteen hundred and twelve business- and professional-oriented trade associations and labor unions will be contacted to obtain information. The participants for the survey will be individuals most responsible for workplace safety and health issues for members of these organizations. This individual may be a safety and health professional, the executive director, the organization's manager, or other staff who conduct these duties.

The pilot test with eight business- and professional-oriented trade associations and labor unions indicated that the full survey takes approximately 15 minutes

to complete. The survey was designed so participants are able to answer the questions quickly.

12A. Estimated Annualized Burden Hours

Type of Respondent	Form Name	No. of Respondents	No. of Responses per Respondent	Hrs/ Response	Response Burden
Health & safety personnel	Full form	1455	1	15/60	364
Health & safety personnel	Non-response form	357	1	2/60	12
Total		1,812			376

The differences in the projection of the number of respondents and the number of response burden hours provided above and the estimates provided in the 60-day Federal Register Notice are due to three factors. First, the latest estimates include professional-oriented trade associations, where these associations were not initially included. Through discussions with stakeholders, we realized that for certain industrial sectors such as health care, professional-oriented trade associations play an important role in providing health and safety information to their members. Therefore, an additional 763 associations were added as potential respondents. Second, a very short, 2 question (approximately 2 minutes), nonresponse form was developed to capture a minimum amount of data about associations and unions dissemination practices in regards to occupational safety and health. Finally, the survey instrument was shortened to reduce the amount of time it would take for a respondent to complete the data collection from 20 minutes to 15 minutes. The culmination of these three changes is that the number of respondents increased from 935 respondents as indicated in the Federal Register Notice to 1455 respondents answering the full survey instrument and 357 respondents answering the nonresponse form with an increase in burden hours from 312 hours to 376.

According to the Bureau of Labor Statistics, and based on 2004 data, the median hourly wage for general and operations managers is \$38.13 per hour. Using the above information, the total cost estimates for all 1812 participants in the survey were determined as follows:

12B. Estimated Annualized Burden Cost

Type of Respondents	No. of Participants	Response Burden per Respondent (in hours)	Hourly Wage Rate*	Respondent Cost
Health & safety personnel	1455	.25	\$38.13	\$13,869.79
Health & safety personnel	357	.033	\$38.13	\$ 453.29
Total	1812			\$14,323.08

*2004 Median rate for general and operations managers in dollars calculated from Bureau of Labor Statistics website (<http://www.bls.gov/oes/current/oes111021.htm>)

13. Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers

The interviews have no capital, operating, or maintenance costs for the respondents or their employers.

14. Annualized Cost to the Federal Government

This baseline study will be conducted by ORISE under an Interagency Agreement with NIOSH. ORISE will participate in the development of the survey plan and survey instrument, pilot testing the survey instrument, conducting the interviews, conducting the data analysis, and developing reports of the results. The total cost of the Interagency Agreement is \$457,259.56. The estimated total cost of the project to the government is \$497, 259.56. This includes the cost for the data collection by ORISE as well as the \$40,000 cost for the federal employees involved in the survey design, oversight, data analysis, and report writing. The government employee costs are as follows: Year 1: 200 hours of a GS15 (\$12,000), 100 hours of a GS12 (\$3,500), and 20 hours of a GS05 (\$335); Year 2: 200 hours of a GS15 (\$12,000), 300 hours of a GS12 (\$10,500), and 100 hours of a GS05 (\$1665). The total time period from the beginning of the project until its completion is two years. Therefore, the annualized cost of the project to the government is \$248,629.78.

15. Explanation for Program Changes or Adjustments

This is a new data collection submission.

16. Plans for Tabulation and Publication and Project Time Schedule

A16-1 Project Time Schedule

Project Activity	Time Schedule
Training of interviewers	1 month after OMB approval
Letters sent to respondents	1-2 months after OMB approval
Interview 1812 associations and labor unions	2-8 months after OMB approval
Data analysis	4-10 months after OMB approval
Reports of results for each sector and overall results	10-12 months after OMB approval

Analysis and Publication Plan

Analyses will be conducted separately for the business-oriented trade associations, professional-oriented trade associations, and the labor unions within each of the eight sectors as data collection for that sector is completed. Each item in each question will be examined separately. Descriptive analysis results will be presented graphically and in tables. The most important outcomes will appear in the main body of the final reports with the results for all questions included in an appendix. Wherever appropriate, a graph or table will display information from related analyses to decrease the number of separate presentations.

Type of analytic results will vary from question to question, depending upon the nature of the data collected, although percents will be calculated whenever suitable. Because simple random sampling will be carried out within strata, the within-stratum percents will be assessed by dividing the number responding affirmatively by the total number responding. For strata in which sampling occurred, 95% confidence intervals will accompany each estimated percent. Confidence intervals are not necessary in strata where all members are invited to participate because actual population values are obtained rather than estimates of population values. After analysis is completed for each of the eight sectors, business-oriented trade association and professional association percents will be examined to determine whether it is valid to combine sector estimates for analyses of interest.

When data for all sectors have been obtained, it may also be valid to present certain combined results across several or all sectors. In particular, it will be desirable to obtain overall percents for all business-oriented trade associations combined and for all professional-oriented trade associations combined as well as all labor unions

combined. To calculate results for business-oriented trade associations as a group or all professional-oriented trade associations as a group, data must be weighted to take into account the stratified sampling design. For labor union strata, the sector called Services except Healthcare & Social Assistance contains more members than all of the remaining seven sectors combined. Therefore, combined strata percents will be calculated with and without the data from Services except Healthcare & Social Assistance. No weighting is necessary since sampling will not occur in the labor union strata.

This data collection will be the first opportunity for NIOSH to systematically obtain information about occupational safety and health information distribution and use from associations and labor unions within the 8 NORA industrial sectors. The process of interacting with and surveying these associations and labor unions will allow NIOSH to develop a benchmark against which future efforts in partnership and communication can be measured. The ultimate desired outcome from this project is to assure that these organizations have the occupational safety and health information needed to help prevent workplace safety and health injuries and illnesses among their members.

Reference:

Lee, E.S., Forthofer, R.N., Lorimor, R.J., Analyzing Complex Survey Data, Sage University Paper # 71, Quantitative Applications in the Social Sciences Series, Sage Publications, Newbury Park, 1989.

17. Reasons(s) Display of OMB Expiration Date is Inappropriate

We are not requesting an expiration date display exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submission

We are not requesting an exception to the certification statement.