

**SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS (ICR) FOR
THE VOLUNTARY PROTECTION PROGRAMS (VPP)
OFFICE OF MANAGEMENT AND BUDGET (OMB)
NO. 1218-0239 (April 2008)**

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.

The Occupational Safety and Health Administration's (OSHA) mission is to prevent work-related injuries, illnesses, and deaths. Historically, OSHA's most recognizable means of accomplishing this mission has been the promulgation and enforcement of occupational safety and health standards. However, OSHA recognizes that it cannot accomplish its mission solely through the enforcement of such standards, and employs other strategies to accomplish its mission. One of these strategies is to encourage employers to implement comprehensive safety and health management systems.

The legislative underpinning for VPP is Section (2)(b)(1) of the Occupational Safety and Health Act of 1970, which declares the Congress's intent "to assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources - (1) by encouraging employers and employees in their efforts to reduce the number of occupational safety and health hazards at their places of employment, and to stimulate employers and employees to institute new and to perfect existing programs for providing safe and healthful working conditions."

OSHA's Voluntary Protection Programs (VPP) - a partnership between labor, management, and government - is one of several successful initiatives resulting from this strategy. The VPP are designed to recognize and promote excellence in safety and health management. Originally, VPP consisted of three programs: Star, Merit, and Star Demonstration, and the Special Government Employees (SGE) Program which support these programs.

In 2004, OSHA introduced the OSHA Challenge and VPP Corporate pilot programs. OSHA Challenge provides greater opportunities to eligible employers interested in working with OSHA to create safer and healthier workplaces for their employees. The VPP Corporate pilot allows corporations committed to VPP and interested in achieving VPP recognition at facilities throughout their organization with more efficient means to accomplish this goal. After conducting several evaluations, OSHA decided to continue with these pilots.

In order to qualify, worksites must adhere to the VPP's rigorous programmatic requirements. Because Star is the VPP's most prestigious recognition and has the most rigorous requirements, only sites with the most excellent safety and health management systems achieve Star status. The Star Demonstration program also recognizes sites with exemplary safety and health

management systems, but allows for the testing of experimental approaches that are different from current Star requirements. Merit sites, meanwhile, have good safety and health management systems, but must take additional steps to reach Star status. OSHA Challenge is designed to reach and guide employers and companies in all major industry groups who are strongly committed to improving their safety and health management systems and interested in pursuing recognition in the (VPP). OSHA Challenge provides participants a guide or roadmap to improve performance and ultimately to VPP Merit or Star. The VPP Corporate Pilot program is designed to provide more efficient processes for Corporations to increase their level of participation in VPP. Under the OSHA Corporate Pilot, corporations work with their eligible facilities to prepare streamlined VPP applications. The pilot concept is two-fold. The Corporations submit an application that describes corporate-level policies and programs that are uniformly applied at facilities across the Corporation. A comprehensive Corporate Evaluation is conducted by OSHA to verify the contents of the application. Once a Corporation is accepted in the VPP Corporate Pilot, all eligible corporate facilities will apply for VPP participation using more efficient streamlined application and onsite evaluation processes. All VPP worksites are removed from programmed inspection lists for the duration of their participation, allowing OSHA to focus enforcement resources on establishments that are less likely to meet OSHA standards.

In 2006 OSHA launched a nationwide VPP Mobile Workforce Demonstration for Construction Program. This Demonstration is intended to create greater opportunity for employers and employees in the construction industry to participate in VPP and in so doing, to strengthen worker protection significantly. At the same time it will give OSHA additional opportunities to explore and test appropriate modifications to VPP, alternative requirements that will help us bring the benefits of this program to the construction industry. OSHA believes this new Demonstration will work for both companies that typically function as controlling general contractors and companies that perform specialty trade functions, regardless of size.

This Demonstration will not limit construction employers with long-term projects from pursuing site-based participation in accordance with established VPP policies. Construction industry participants in OSHA's existing Short-Term and Mobile Workforce Demonstration will be transitioned to this Demonstration.

To qualify all applicants must have been in operation in the construction industry for at least three years. The applicant onsite review of their headquarters must conclude that the applicants' safety and health management system meets all VPP star requirements. The applicant's Designated Geographic Area (DGA) will ultimately be recognized at either the Star or Merit level based on how well the aforementioned SHMS is implemented at the site(s) visited during the worksite evaluation phase.

The applicants should submit their Demonstration Program application to the VPP Manager in the OSHA Regional Office with Jurisdiction over their headquarters.

In addition, safety and health professionals employed at approved VPP sites may apply to be trained as special government employees. As special government employees, these individuals

may participate on VPP onsite evaluations, assisting with the review of company documents, worksite walkthroughs, employee interviews, and preparing VPP onsite evaluation reports. By enrolling, these individuals' expertise, experience, and enthusiasm, the Special Government Employees Program allows OSHA to leverage resources and promote safety and health excellence.

Participation in VPP is strictly voluntary, and does not diminish existing employer and employee rights and responsibilities under the Occupational Safety and Health Act (OSH Act). In particular, OSHA does not intend to increase the liability of any party in an approved VPP site. Employees or any representatives of employees taking part in an OSHA-approved VPP safety and health management system are not assuming the employer's statutory or common law responsibilities for providing safe and healthful workplaces, or undertaking in any way to guarantee a safe and healthful work environment.

The information collected for VPP is necessary due to the legislative expectation that OSHA "continue to place high priority on the VPP." The information collected is also necessary to ensure effective program administration, as detailed below.

In order to participate in the VPP, OSHA requires an applicant to submit an application containing a detailed description of its safety and health management system. OSHA needs this information to conduct a preliminary analysis of its system, and to make a preliminary determination regarding the worksite's qualifications for VPP. Lacking this information, OSHA would consume thousands of person-hours conducting onsite evaluations at worksites that are not ready to qualify for the VPP.

In 2008, OSHA modified VPP procedures for applications, onsite evaluations, and annual participant self evaluations for applicants/participants subject to OSHA standard 29 CFR 1910.119 and 1926.64 Process Safety Management (PSM), which covers all employers who either use or produce highly hazardous chemicals exceeding specified limits. Affected applicants/participants must submit responses to the PSM application supplement along with their VPP application.

Once in the VPP, affected participants are required to complete a supplemental PSM questionnaire as part of their annual self evaluation submission. OSHA needs this information to ensure that the participant remains qualified to participate in the VPP between onsite evaluations. Each year, OSHA will compile a list of approximately 25 questions for participants to complete. The questions will change every year, but will be similar in nature to those questions found within the PSM Application Supplement, falling within the 11 categories outlined in the PSM Application Supplement (management of change, relief design, vessels, piping, operating procedures, process hazard analysis (PHA), siting/human factors, operator training, safe work practices, incident investigation, blowdowns). The first PSM Questionnaire will be compiled and disseminated during the fourth quarter of 2008 in advance of the February 15, 2009 Annual Evaluation deadline.

Lacking this information, OSHA would be unable to determine whether applicants are maintaining excellent safety and health management systems during this interim period.

To participate in the Special Government Employee (SGE) Program, each applicant must complete and submit an SGE application packet to be approved by OSHA. The SGE application contains three sections: 1) SGE Eligibility Information Sheet ensures that the potential SGE works at a VPP site and meets the minimum eligibility requirements; 2) Current resume provides a detail description of the applicant's current duties and responsibilities as they relate to safety and health and the implementation of an effective safety and health management system; and 3) Confidential Financial Disclosure Report (OGE Form 450) which provides a listing of financial interests to ensure the SGE does not participate on onsite evaluations at VPP site where they may have a financial conflict. Lacking this information, OSHA would have no means of ensuring that individuals appointed as SGEs are qualified to participate as team members during VPP onsite evaluations. SGEs who wish to renew their participation must resubmit their application information after three-years.

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.

OSHA Regional Office personnel use the initial VPP application to: (a) conduct a preliminary analysis of the applicant's safety and health management system, and (b) make a preliminary determination regarding the applicant's qualifications for VPP. Once accepted, the application is reviewed by the VPP team prior to conducting a VPP onsite evaluation. If the applicant is approved for participation, federal personnel will use the application and subsequent annual evaluations to (a) justify continued participation in the program, (b) evaluate program performance, and (c) as models of effective safety and health management.

OSHA National Office personnel use the initial Challenge Administrators application to: (a) conduct a preliminary analysis of the applicant's safety and health management system, and (b) make a preliminary determination regarding the applicant's qualifications for VPP. Once accepted, the application will be reviewed by the VPP team prior to conducting a VPP onsite evaluation. If the applicant is approved for participation, federal personnel will use the application and subsequent annual evaluations to (a) justify continued participation in the program, (b) evaluate program performance, and (c) serve as models of effective safety and health management implementation. OSHA needs this information to ensure that corporations qualify to participate in these pilot programs. The information collected is also necessary to ensure effective program administration, as detailed above.

OSHA Regional and National Office personnel use the initial VPP Corporate application to: (a) conduct a preliminary analysis of the applicant's safety and health management system, and (b) make a preliminary determination regarding the applicant's qualifications for participation in the pilot program. If the corporation is approved for participation federal personnel use the

application and subsequent annual evaluations to justify continued participation in the program and evaluate program performance.

National Office personnel use the information submitted by the Special Government Employee applicants to ensure that individuals are qualified to serve as special government employees, arrange for participation at VPP onsite evaluations, send congratulatory letters, and inform participants of their status in the program. Specifically, the resume and Confidential Financial Disclosure Report (OGE Form 450) are used to ensure that special government employees do not participate in evaluations at sites where there may be a conflict of interest.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques, or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adapting this means of collection. Also describe any consideration of using information technology to reduce burden.

OSHA welcomes the electronic submission of VPP documents, where such technology is available. However, some VPP documents require signatures, and must be submitted in hard copy until electronic signature (e-signature) is made available throughout the Department and or Agency systems. The agency is in the process of developing the OSHA Information System (OIS). Once OIS is completed, electronic submission of VPP and VPP SGE application will be available.

Currently, applicants may submit most VPP applications, annual evaluations, and SGE information electronically. The exceptions to this are the following documents – VPP: Statements of Commitment from site management, (if applicable) and letter(s) of support from each union; - SGE: Confidential Financial Disclosure Report (OGE Form 450) and the applicant’s resume. OSHA expects to receive all applications and evaluation submitted by OSHA Challenge and VPP Corporate participants to be accomplished through electronic means.

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.

The VPP application and annual evaluation is participant/applicant specific, and are not requested or collected by OSHA in any other circumstances. In instances where OSHA regulations require employers to maintain written programs, this information may be used to satisfy VPP application requirements. The Special Government Employee application is applicant-specific, and is not requested or collected by OSHA under any other circumstances.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 81-I), describe any methods used to minimize burden.

Small businesses (i.e., 250 or fewer employee’s onsite and 500 or fewer employees’ corporate-wide) account for approximately 4.3% of current VPP participants, so the programs’ impact on small businesses is limited. Despite the fact that small businesses comprise a relatively small proportion of VPP participants, OSHA is concerned with minimizing their paperwork burden.

To that end, OSHA only requires that applicants demonstrate the presence of a comprehensive safety and health management system which is commensurate with their occupational hazardous exposures. Because small businesses typically have a smaller spectrum of hazardous exposures and fewer levels of management, the amount of documentation required to demonstrate a comprehensive safety and health management system is less than for larger companies. This translates into a smaller paperwork burden for 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.

Not allowing OSHA to collect the information required in VPP applications, OSHA Challenge applications, and VPP Corporate applications and annual evaluations for these programs would eliminate the Agency's ability to accept new participants into these programs or re-certify current sites for continued participation. This action would deprive VPP members of the benefits and prestige associated with program participation. Forcing OSHA to collect the information less frequently would limit the Agency's ability to ensure that participants' sites are maintaining superior safety and health management systems.

Similarly, not allowing OSHA to collect Special Government Employees' application information would eliminate the agency's ability to accept new individuals into the program, or re-certify current participants for a new term of service. Requiring OSHA to collect Special Government Employees' application information less frequently would limit the Agency's ability to maintain current and accurate information on Special Government Employees, and result in a less effective program. Because Special Government Employees are critical for maintaining VPPs success, a less effective program would deprive OSHA of valuable resources and services provided by the Special Government Employees, limit VPP growth, deny potential and current VPP participants their valuable expertise, and deny individuals the prestige associated with being a Special Government Employee.

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 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.**

No special circumstances exist that require employers to collect information in the manner or using the procedures specified by this item. The information collection requirements are consistent with the guidelines provided in 5 CFR 1320.5.

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 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.

As required by the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), OSHA published a *Federal Register* notice on February 21, 2008, (73 FR 9594, Docket No. OSHA-2007-0090, requesting public comments on its proposed extension of the collection of information requirements contained in the Voluntary Protection Programs (VPP). This notice was part of a preclearance consultation program intended to provide interested parties with the opportunity to comment on OSHA's request for an extension by the Office of Management and Budget (OMB) of a previous approval of the information collection requirements found in the program. The Agency received two comments one from Ray Magruder, Quaker Manufacturing, LLC and the second from Raymond Aguilar, United States Marine Corp.

Mr. Magruder stated: "We feel as though the request to extend OMB approval of the information collection requirements contained in the Voluntary Protection Programs is needed" and "VPP reaches beyond typical OSHA enforcement by implementing an effective system to manage safety and health. This system creates an employee mind-set at VPP worksites that is visibly different than that of a non-VPP work environment. The management and employees have instituted an effective relationship that harbors the cooperative and continuous improvement ideals of VPP. The employees at our worksite come to work everyday knowing that they have made a difference and will return home safe at the end of their shift."

OSHA appreciates the comment from Quaker Manufacturing, LLC and its support for VPP; however, Quaker Manufacturing did not make specific comments on OSHA's requested burden hours and cost estimates. Therefore, OSHA is not modifying or revising the burden hour estimates or costs associated with this ICR.

Mr. Aguilar recommend that OSHA accept VPP applications, annual renewals and other VPP submissions electronically, allowing for either electronic or fax signatures as required.

OSHA addresses the issue of electronic submission under Item 3 of this Supporting Statement. Item 3 states:

Currently, applicants may submit most VPP applications, annual evaluations, and SGE information electronically. The exceptions to this are the following documents – VPP: Statements of Commitment from site management, (if applicable) and letter(s) of support from each union; - SGE: Confidential Financial Disclosure Report (OGE Form 450) and the applicant's resume. OSHA expects to receive all applications and evaluation submitted by OSHA Challenge and VPP Corporate participants to be accomplished through electronic means.

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

The Agency will not provide payments or gifts to the respondents.

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

Respondents are assured of the confidentiality of their application until it is approved through the policies outlined in VPP Policies and Procedures manual and the Special Government Employees Policies and Procedures Manual.

Participants applying for the VPP, OSHA Challenge, and VPP Corporate understand that, if approved to participate into these programs, their application becomes part of the public record. Special Government Employees understand that, if approved to the program, they will be considered active Special Government Employees and may be requested to participate on VPP onsite evaluations. Information collected in the application concerning financial disclosures remains confidential and are not available to the public.

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.

The information collection requirements do not involve the collection of sensitive information.

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 collection of information, identifying and using appropriate wage rate categories.**

The information collection estimates contained in the table below are based on programmatic expertise and experience of federal personnel, consultation with a small (fewer than 10) sample of VPP participants, a high cost estimate of \$25.00 per hour for private sector personnel, and best professional judgment.

**Annual Effect of VPP Information Collection
On the Private Sector**

Information Collection	Estimated Number of Responses (3-year average)	Frequency of Response	Estimated Annual Burden-Hours per Respondent	Estimated Annual Burden-Hours	Preparation Cost per Document	Estimated Annualized Costs
VPP						
VPP Application (See footnote*1)	274	1 time	200 hours	54,800	\$5,000	\$1,370,000
VPP Application Supplemental/PSM Questionnaire	68 (25% of VPP Applications)	1 time	40 hours	2,720	\$1,000	\$68,000
VPP Annual Evaluation	1300	1 per year	20 hours	26,000	\$500	\$650,000
PSM Evaluation/Supplemental Questionnaire	300 (25% of VPP Annual Evaluation)	1 per year	20 hours	6,000	\$500	\$150,000
OSHA Challenge Pilot Program						
Challenge Administrators Application	17	1 time	5	85	\$125	\$2,125
Challenge Pilot Candidate Application	120	1 time	10	1,200	\$250	\$30,000
Quarterly Reports	120	3 times per year	5	1,800	\$125	\$45,000
Annual Evaluation	120	1 time per year	20	2,400	\$500	\$60,000
VPP Corporate Pilot Program						
Corporation Application	7	1 time	120	840	\$3,000	\$21,000
Corporate VPP Facility Application	120	1 time	80	9,600	\$2,000	\$240,000
Annual Report	7	1 time per year	40	280	\$1,000	\$7,000
Special Government Employees						
SGE Eligibility Information Sheet	300	Yearly	8 minutes	40 hrs	\$5.	\$1,500.

Resume	300	Yearly	30 minutes	150 hrs	\$13.	\$3,900.
Confidential Financial Disclosure Form (OGE-Form 450) (See footnote *2)	300	Yearly	0	0	0	0
Request for Name Check	300	Yearly	10 minutes	50 hrs	\$4	\$1,200
Total	3,353			105,965		\$2,649,725

Footnote*1. Approximately 25% of existing VPP sites and new applicants fall under OSHA’s Process Safety Management Standards. In addition these sites must complete information requested in the Process Safety Management (PSM) Applications and the Annual Evaluation/Supplemental Questionnaire.

Footnote*2. The paperwork burden associated with the Confidential Financial Disclosure document is not included in this ICR Burden hours for this document. This document is accounted for under OMB Control Number 32090-0006 (OGE-450). Responses are not included response total.

13. Provide an estimate of 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 shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software, monitoring, sampling, drilling and testing equipment, and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve a regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

The cost determined under Item 12 accounts for the total annual cost burden to respondents or record keepers resulting from these collections of information requirements.

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

The information collection estimates contained in the table below are based on programmatic expertise and experience of federal personnel, an average cost estimate of \$46.00 per hour of government personnel time (GS-13, Step 6), and best professional judgment.

**Effects of VPP Information Collection
On the Federal Government**

Information Collection	Estimated Number of Responses (3-year average)	Frequency of Response	Federal Government Review Time per Document	Total Annual Review Time per Document	Federal Government Review Costs
VPP					
VPP Application (See footnote 1 on page 9)	274	1 time	5 hours - GS-13	1,370 hours	\$63,020
Process Safety Management Applications	68 (25% of VPP Applications)	1 time	7 hours - GS-13	476 hours	\$21,896
VPP Annual Evaluation	1300	1 per year	2 hours - GS-13	2,600 hours	\$119,600
(PSM) Annual Evaluation/Supplemental Questionnaire	300 (25% of VPP Annual Evaluation)	1 per year	2 hours - GS-13	600 hours	\$27,600
OSHA Challenge Pilot Program					
Challenge Administrators Application	17	1 time	5 hours - GS – 13	85 hours	\$3,910
Challenge Pilot Candidate Application	120	1 time	5 hours - GS – 13	600 hours	\$27,600
Quarterly Reports	120	3 times	2 hours - GS – 13	720 hours	\$33,120
Annual Evaluations	120	1 time	2 hours - GS – 13	240 hours	\$11,040
VPP Corporate Pilot Program					
Corporation Application	7	1 time	5 hours - GS – 13	35 hours	\$1,610
Corporate VPP Facility Application	120	1 time	5 hours - GS – 13	600 hours	\$27,600
Annual Reports	7	1 time	5 hours - GS – 13	35 hours	\$1,610
Special Government Employees					
General Eligibility	300	Yearly	10 minutes GS-13	50 hours	\$2,300.

Information Collection	Estimated Number of Responses (3-year average)	Frequency of Response	Federal Government Review Time per Document	Total Annual Review Time per Document	Federal Government Review Costs
Information Sheet					
Optional Application for Federal Employment (OF-612 or resume)	300	Yearly	4 minutes GS-13	20 hours	\$920
Confidential Financial Disclosure Form (OGE-Form 450) (See footnote 2 on page 9)	300	Yearly	4 minutes GS-13	20 hours	\$920.
Request for Name Check	300	Yearly	1minute GS- 13	5 hours	\$230.
Total	3,653			7,,456	\$342,976

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

OSHA is requesting a program adjustment of 19,065 burden hours over the last approval of 86,900 resulting in an annual paperwork burden allotment of 105,965 burden hours. This adjustment is justified by the number of VPP applicants that are subject to OSHA’s Process Safety Management (PSM) Standard, and the growing popularity of the Special Government Employee Program which leads OSHA to expect an average of 300 Special Government Employees be trained and appointed annually over the next three years.

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 the information, completion of report, publication dates, and other actions.

There are no plans to publish this information.

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

OSHA is not seeking such approval.

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

OSHA is not seeking such an exception.