

# Supporting Statement for Paperwork Reduction Act Submission For Technical Training Program Course Effectiveness Evaluations

**OMB Control Number 1029-0110**

Terms of Clearance: None

## **Introduction**

This information collection clearance package is being submitted by the Office of Surface Mining Reclamation and Enforcement (OSM) for renewed authority to collect information from two training evaluation surveys. The Office of Management and Budget (OMB) previously approved this collection and assigned it clearance number 1029-0110. The evaluations are disseminated to assist OSM in determining the effectiveness and future needs of respondents who participate in OSM technical training courses. In this way, the evaluations are designed to benefit the public.

## **General Instructions**

*A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.*

## **Specific Instructions**

### **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 regulation mandating or authorizing the collection of information.*

The Training Evaluations are needed to identify and evaluate topics most useful for those who participate in OSM's technical training classes, specifically representatives from State and Tribal regulatory and reclamation authorities. These surveys assist OSM in meeting Executive Order 12862 (E.O.) issued by President Clinton on September 11, 1993.

Among the directives in this E.O. was the requirement that agencies "survey customers to determine the kind and quality of services they want and their level of satisfaction and effectiveness with existing services." As expressed in this E.O., customer satisfaction and effectiveness are seen as the ultimate performance indicators for the Federal Government because it shows how well our customers are being served and what we must do to close the "gap" between what we provide to our customers and what they want. This collection provides information to determine the level of satisfaction and effectiveness with the training services provided by OSM and identifies areas where improvements in providing these services may be made.

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. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]*

OSM is seeking OMB approval to continue collecting information for two evaluations, one to be completed by students who participated in an OSM technical training course, and the other evaluation to be completed by the students' supervisors. OSM sends out the evaluations three months after a course is completed, because this allows sufficient time for course participants to implement course information, material, and field exercise experiences in their current jobs.

The information collected is used to identify and evaluate the effectiveness of OSM's training courses, and to expand on the curriculum where needed. The intent of OSM's training program is to enhance

students' current job performance. Therefore, it is important for OSM to determine the effectiveness of the courses, and to modify existing courses, or to develop new courses to meet the needs of students and their employers, which are State and Tribal regulatory and reclamation authorities.

The qualitative evaluations are used as feedback tools that are limited to providing OSM's training program with identifying information on the effectiveness of courses as it pertains to helping participants improve in their job-related work. Every question and answer used on the evaluations assist the training program in determining what course information is useful, what information needs to be changed, and the exploration of new topics and ideas that need to be considered as additions to courses to improve course effectiveness. The courses are revised on a yearly basis to ensure state-of-the-art science information is included.

Renewal of this information collection means that OSM will continue to obtain sufficient data to assess the level of customer satisfaction and program effectiveness with the technical training classes. It will continue to provide OSM with the critical program indicators essential to determine the effectiveness of our services and develop improvements that our customers want.

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 [and specifically how this collection meets GPEA requirements.].*

OSM is now submitting e-mail requests with a "hot link" to the Department of the Interior's National Business Center's Learning Management System, Metrics That Matters, to complete the evaluation forms. Metrics That Matters is a sub-system that integrates with the Learning Management System to automate the evaluation

process for training events. It records the evaluation data and then it gives you several ways to benchmark and review the data once it is in the system.

OSM will send e-mail requests to all students and their supervisors three months after a course has been held with a request that they complete the survey. A "hot link" is provided on the e-mail request that takes the employee/supervisor directly to the form to be completed.

It is anticipated as a human capital investment OSM will continue to show the effectiveness of training. We are hopeful that the information challenges provided by the Learning Management Systems, Metrics That Matters will give decision makers access to information to make better choices on how much to invest in training, what types of training to offer, and what training methods offer the greatest impact.

This is a closed, secure system with limited access to the Department of the Interior to ensure that information is not compromised.

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.*

OSM sends these requests for evaluations to each participant of a technical training program and requests participants and their supervisors to respond to basic questions regarding improved job performance and course usefulness. Similar information does not exist elsewhere, and there is no duplication.

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.*

There is no special burden assigned to small entities. Respondents are course participants and their supervisors.

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.*

This information is collected approximately three months after each training class is held. Without these follow-up evaluations, we do not know whether we have met either the customers' present needs or are in a position to meet their future training needs.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner:*
  - \* requiring respondents to report information to the agency more often than quarterly;*
  - \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
  - \* requiring respondents to submit more than an original and two copies of any document;*
  - \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
  - \* in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
  - \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
  - \* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
  - \* requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

These collections are conducted in conformance with the provisions of 5 CFR 1320.5(d)(2).

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 in response to the PRA statement associated*

*with the collection over the past three years] 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 record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.]*

*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.*

OSM sends the Technical Training Program Course Effectiveness Evaluations to students and their supervisors approximately three months after they have completed each training class.

In March 2009, OSM contacted two supervisors and two employees who recently completed these forms:

Mr. Greg Weddington, Supervisor  
Prestonsburg, Kentucky  
606-889-1746

Mr. Daron Haddock, Supervisor  
UT/Dept. of Natural Resources  
801-538-5320

Ms. Dana Dean, Employee  
UT/Dept. of Natural Resources  
801-538-5320

Mr. Chester Edwards, Employee  
OSM, Applicant Violator System (AVS)  
859-260-3928

None of the individuals contacted expressed concerns or complaints with the reporting requirements of these forms and each person indicated that the time required to complete and send the forms was about 10 minutes. OSM submits e-mail requests with a "hot link" to the Department of the Interior's National Business Center's Learning Management System to complete the forms.

On April 23, 2009, OSM published in the Federal Register (74 FR 18591) a notice requesting comments from the public regarding the need for the collection of information, the accuracy of the burden estimate, ways to enhance the information collection, and ways to minimize the burden on respondents. This notice gave the public 60 days in which to comment; however, no comments were received.

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

Not applicable. Payments or gifts are not provided to respondents of the evaluations.

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

Respondents are informed by cover letter that participation is voluntary and that their responses are anonymous. Neither their names nor other identifying information are divulged.

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 questions of a sensitive nature are asked.

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.

### Estimated Cost

#### a. Estimated Burden to Respondents

OSM distributed 400 surveys to students during a recent 12-month period and received 215 responses (54%). OSM also sent 400 surveys to supervisors during the same period and received 210 responses (53%). Based on discussions with those identified in item 8 above the surveys require approximately 10 minutes each, on average, to complete. Therefore,

425 responses x 10 minutes = 4,250/60 = approximately 71 hours.

#### b. Estimated Cost to Respondents

OSM estimates that 425 responses will be received each year, 215 by students and 210 by their supervisors. OSM estimates that the typical State employee who attends OSM training classes would have the equivalent salary of an engineering technician at \$41 per hour including benefits. In addition,

the supervisor would have the equivalent salary of a Mining Engineer who averages \$54 per hour with benefits. (Salaries are derived from Bureau of Labor Statistics at [http://www.bls.gov/oes/2008/may/oes\\_nat.htm#b17-0000](http://www.bls.gov/oes/2008/may/oes_nat.htm#b17-0000)) OSM estimates the following costs for respondents:

Industry Wage Cost  
(including 1.5 multiplier for benefits)

Position	Hour Burden per Response	Cost Per Hour (\$)	Total Wage Burden (\$)
Engineering Technician	.167	41	6.85
Mining Engineer	.167	54	9.02

(OSM derived the 1.5 multiplier from the ratio between wages and benefits for government workers in the U.S. Bureau of Labor Statistics for EMPLOYER COSTS FOR EMPLOYEE COMPENSATION—MARCH 2009 at - <http://www.bls.gov/news.release/pdf/ecec.pdf>)

Therefore, the estimated total annual wage cost for all students would be  $\$6.85 \times 215 = \$1,473$ . The estimated total annual wage cost for all supervisors would be  $\$9.02 \times 210 = \$1,894$ . The total wage cost to all state respondents is  $\$1,473 + 1,894 = \$3,367$ .

13. *Provide an estimate of the total annual [non-hour] 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).*
- \* 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 [including filing fees paid]. 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 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.

a. Annualized Capital and Start-Up Costs:

There are no capital or start-up costs to complete this information collection beyond that incurred by normal business activities.

b. Operation and Maintenance Costs:

There is no distinct operation or maintenance costs associated with the information collection requirements for this section.

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.

Estimated Cost to Federal Government

A total of 800 surveys were sent, requiring approximately 3 hours. Also, OSM staff received 425 responses requiring one Technical Training Specialist 15 minutes to process each survey, or 106.25 hours. Therefore, OSM required approximately 109.25 hours distributing and reviewing the responses. At \$40.35

per hour for a GS-11, step 5  
([http://www.opm.gov/oca/09tables/html/g\\_s\\_h.asp](http://www.opm.gov/oca/09tables/html/g_s_h.asp))  
including 1.5 for benefits, the annual cost to the  
Federal government is \$4,408 (rounded).

(OSM derived the 1.5 multiplier from the ratio between wages  
and benefits for public sector workers in the U.S. Bureau of  
Labor Statistics for EMPLOYER COSTS FOR EMPLOYEE  
COMPENSATION—MARCH 2009 at -  
<http://www.bls.gov/news.release/pdf/ecec.pdf>)

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

The currently approved information collection burden for these surveys is 79 hours. This information collection request seeks 71 hours. This adjustment may be attributed to a decrease in the number of individuals that take OSM training courses. Therefore, the burden changes as follows:

79 hours currently approved  
- 8 hours due to an adjustment in respondents  
71 hours requested

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.*

There are no plans for publication of this information. The information provided on the evaluations is for OSM's internal use only. The purpose of the evaluations is to provide us with information to develop courses that will assist in improving the technical competence and professionalism of Federal, State, and Tribal personnel.

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

The OMB approval number and expiration date are displayed on each of the evaluation forms.

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

Not applicable. There are no exceptions to the certification statement. This collection complies with 5 CFR 1320.9 where applicable.

**B. Collections of Information Employing Statistical Methods**

See Supporting Statement Part B.