**Supporting Statement for the Information-Collection Requirements of the
OSHA Outreach Training Program
and
OSHA Training Institute Education Centers Program Data Collection
OMB Control No. 1218 –0NEW (March 2010)**

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.**

Section 21 of the Occupational Safety and Health Act of 1970 (the "OSH Act") (29 U.S.C. 670) (Attachment A) authorizes the Occupational Safety and Health Administration ("OSHA" or the "Agency") to conduct directly, or through grants and contracts, education and training courses. These courses must ensure an adequate number of qualified personnel to fulfill the purpose of the Act, provide them with short-term training, inform them of the importance and proper use of safety and health equipment, and train employers and employees to recognize, avoid, and prevent unsafe and unhealthful working conditions.

Consistent with the authority of Section 21 of the OSH Act, the Agency created two educational programs, the OSHA Outreach Training Program and the OSHA Training Institute Education (OTI) Centers Program.

In 1971, the OSHA Outreach Training Program was established to rapidly disseminate basic safety and health information to workers. Today, the Outreach Training provides awareness training to workers on the recognition, control and prevention of occupational safety and health hazards. Trainers who successfully complete an OSHA trainer course are authorized to conduct 10- and 30-hour outreach training courses on occupational safety hazards. This is a voluntary program. Students who complete these outreach courses receive a course completion cards from OSHA.

During the 1980s, the number of requests for training from private sector personnel and Federal personnel from agencies other than OSHA increased substantially and the demand eventually exceeded the capacity of the OSHA Training Institute (OTI). To meet the increased demand, in October 1992, the OSHA Training Institute Education Centers Program was created when OSHA began partnering with nonprofit organizations and other training and educational institutions to conduct OSHA Training Institute courses for private sector personal and federal personnel from agencies other than OSHA. These approved centers are referred to as the OSHA Training Institute Education Centers or "OTI Education Centers."

Subsequently, additional organizations were selected through a series of national competitions. The program currently has 25 OTI Education Centers comprised of 44 member organizations.

The Directorate of Training and Education (DTE) is responsible for policy guidance, management and administration of the OSHA Outreach Training Program and the OTI Education Centers Program, among other programs. The Directorate of Training and Education collects and reports student training information on a monthly basis.

To be a participant in one of the educational programs, an individual/organization must provide the DTE, Office of Training and Educational Programs (OTEP), with certain information. Items 2 and 12 below list and describe the 13 information-collection requirements necessary for implementing OSHA's OTI Education Centers and Outreach Training Programs.

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.**

   A. Title: **Application to become an OSHA Training Institute Education Center (OTI Education Center)**

   Information Collected: identifying data such as name; organization; address; type of application and application organization; authority to apply; evidence of nonprofit status; status as a training organization; relevant occupational safety and health training experience; staff qualifications; description of classroom facilities; ability to offer distance learning; description of systems to administer OSHA Outreach Training Program; copy of the applicant's tuition and fee schedule; a description of the applicant's recruitment, marketing, and registration plans; a description of the applicant's accessibility of the training facility for students and a description of lodging accommodation availability; information concerning the organizations ability to provide off-site courses; and copies of the organization's non-discrimination policies for staff and students. (Attachment B, copy of Federal Register #72:39851-39859, OSHA Training Institute Education Center; Notice of Competition and Request for Applications.)

   Purpose: To obtain basic information about the applicant organization and application, to evaluate the qualifications of the applicants and their ability to serve the regional population and to determine ability to conduct OSHA courses for private sector personnel and federal personnel from agencies other than OSHA. To evaluate the applicant organization's competence to provide the proposed training (including the qualifications of the personnel to manage and implement the training).

B.   Title: **OTI Education Centers Monthly Summary Report for the OTI Education Centers and Outreach Training Program Activities**

B1. Information Collected for OTI Education Center Program: OTI Education Centers must submit monthly information to the Directorate of Training and Education (DTE), Office of Training and Educational Programs, on the OTI Education Center's activities including: course numbers/titles, OTI Education Center name, dates and locations of training courses (training location city, state, or country if outside the U.S.), number of students trained, number of students attempting exams, number of students passing exams, student contact hours, course chairperson, instructor name(s), and demographic student breakdown (Federal OSHA Personnel, Other Federal Agency Personnel, State OSHA Personnel, Other State Personnel, Private Sector Personnel; U.S. Students, or Foreign Students).

B2. Information Collected for the Outreach Training Program: OTI Education Centers receive requests from Outreach Trainers for cards to provide to their students who have successfully completed one of their training courses (see item D, Outreach Training Program Report Forms). With this information, the OTI Education Centers report monthly the number of classes conducted and the number of students trained for each outreach training program (Construction, General Industry, Maritime, and Disaster Site Worker). OTI Education Centers receive their outreach training card supply from the Directorate of Training and Education (DTE), Office of Training and Educational Programs.

Purpose: Program management, oversight, and reporting. To monitor training activity and evaluate training conducted versus established goals and objectives of the Agency. Collection of data needed for the submission of the annual workload summary. To monitor the implementation of new performance measures; track performance outcomes and efficiency measures; measure monthly, annual and long-term performance targets established for the programs and OSHA uses this information to prepare annual reports to Congress.

C.   Title: "**Statement of Compliance with Outreach Training Program Requirements" (proposed)** [1]/

Information Collected: Trainer signature, date, typed or printed name, name of course and course dates (to be completed by OTI Education Center), and name of OTI Education Center (to be completed by the OTI

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[1]/ OSHA believes the Statement of Compliance is not within the definition of "information" under 5 CFR 1320.3(h) (1). This Statement does not entail additional burden other than to identify the respondent, the date, and the nature of the instrument (training course information).

Education Center) (Attachment D, Statement of Compliance with Outreach Training Program Requirements). [2]/

Purpose: Execution of the Statement of Compliance will serve as a self certification of outreach trainer knowledge of and compliance with program guidelines and to improve processing efficiency while maintaining program integrity and deterring fraud.

D.   Title: **Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker)**

Information Collected: trainer signature; the date the trainer signed the report; type of course conducted (i.e., 10- or 30-hour construction; 10- or 30-hour general industry; 10- or 30-hour maritime; or disaster site worker); course information (indicate whether course was offered in Spanish, to Youth [age 18 or less], indicate the language if other than English or Spanish, whether training was conducted outside the U.S. and/or whether training conducted was related to an OSHA Alliance or Partnership); training site; course duration – start and end times and dates, number of students; first and last name of students; trainer identification number (if applicable); trainer first and last name; trainer course number; expiration date (of the trainer's authorization); the following information is requested to determine where student cards should be sent: [3]/ company name/department; address; city; state; zip; phone number; extension; email; copy of trainer card; topic list and time spent on each required, elective or optional topic.

Each outreach training program (i.e., the 10- and 30-hour construction, 10- and 30-hour general industry, 10- and 30-hour maritime, and disaster site worker) has a set of required, elective, and optional course topics. Because training topics covered and the length of time for each topic area may vary, the Outreach Training Program Report must be completed following each course conducted.

In order to maintain program integrity and deter fraud, outreach trainers are required to maintain records which include student sign-in sheets, student addresses, and a copy of the documentation sent in to request cards, including a list of the topics taught and the amount of time spent on each topic. (Attachment E, Outreach Training Report for Construction; Attachment F, Outreach Training Report for General Industry;

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[2] / Unless otherwise noted, the information requested would be provided by an authorized OSHA Outreach Trainer.
[3] / If the outreach trainer already has an ID number and the address where student cards should be sent has not changed since the last request for students cards, the trainer may leave this section blank. The mailing address information only needs to be completed the first time and at which time there has been a change of address since the last submission.

Attachment G, Outreach Training Report for Maritime, and Attachment H, Outreach Training Program Report for Disaster Site Worker).

Purpose: To monitor training activity and evaluate training conducted versus established goals and objectives of the Agency. These forms are necessary to review compliance with the outreach training program requirements and in order to get student completion cards to the trainer(s). This information is also needed to improve processing efficiency while maintaining program integrity and deterring fraud.

E.   Title: **Online Outreach Training Program Report**

Information Collected: Trainer identifying information, statement of certification, student names, time each student spent online, final test scores, evaluation summary and evaluation data.

Purpose: To monitor online training activity and evaluate training conducted versus established goals and objectives of the Agency. This document is necessary to review compliance with the requirements and in order to get student completion cards to the trainer(s). OSHA has recommended format for submission via U.S. mail (Attachment I, Online Outreach Training Program Report).

F.   Title: **Active Trainer List (proposed)**

Information Collected: trainer name, city, state, company, phone number, and email address.

Purpose: To maintain a list of authorized trainers who have conducted more than two outreach training courses within the last twelve months. These lists are provided to individuals who are searching for outreach training courses available in their vicinity.

G.   Title: **OSHA Training Institute Student Survey (OSHA Form 49 11-05 Edition) (proposed) (OMB 1225-0059)** (Attachment J, OSHA Form 49 11-05 Edition).

Information Collected: Course number, course dates, instructor name, and feedback from student concerning the course; (proposed additional information will be requested: OSHA region, OTI Education Center Name, and the city and state where the training was conducted).

Purpose: OSHA uses the information to evaluate the usefulness, effectiveness, and content of the courses offered by the OTI Education Centers.

H.   Title: **Attendance Documentation for OTI Education Centers**

Information Collected: student first name, middle initial, and last name; course name and number; date; city and state the course was conducted; instructor name and signature, and the name of the OTI Education Center who sponsored or conducted the training.

OSHA believes the daily training roster is not within the definition of "information" under 5 CFR 1320.3(h) (1). The daily training roster does not entail additional burden other than to identify the student, the date, and the course name and signature of trainer. However, OSHA will take a minimum burden for OTI Education Centers to provide this information to OSHA during quarterly audits.

Purpose: Program management and oversight. To verify student attendance as reflected in monthly summary reports.

I.   Title: **Outreach Online Training Certification Statement**

Information Collected: Online organization and type of outreach training program and changes made since the last certification that their online program was current.

Purpose: To ensure program is periodically reviewed and updated to reflect current OSHA requirements.

J.   Title: **Instructor and Staff Resumes (this includes anyone who may be assigned to conduct OSHA classes, whether an online provider, contractor, subcontractor, employee, adjunct professor, etc.)**

Information Collected: This information is collected from the OTI Education Centers and includes resumes of current staff and position descriptions and minimum hiring qualifications for all positions, whether filled or vacant, that may be assigned to conduct OSHA classes. Work history, education, and other qualifications such as Certified Safety Professional (CSP), Professional Engineer (PE), or Certified Safety Hygienist (CIH).

Purpose: For program management and oversight and to obtain the instructor knowledge and experience with OSHA standards and their application to hazards and hazard abatement.

K.   Title: **Course Material Upon Request by OSHA from OTI Education Centers**

Information Collected: curriculum related content, manuals, test questions, etc.

Purpose: To monitor the program content and ensure quality and consistency. The materials are helpful in developing future curriculum and meeting the needs of the Agency's product/service users.

L.   Title: **Course Schedules from OTI Education Centers (proposed)**

Information Collected: Course title, description, registration hyperlink, OSHA region, address of OTI Education Center, phone number for OTI Education Center, web site address, class date, class time, class address, and any additional class location information.

Purpose: To help workers find occupational safety and health training offered by the OTI Education Centers.

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

OSHA has endeavored to make the collection of the above-referenced information easy for program participants to complete and submit. Currently program participants have the option to complete and submit the following data electronically:

A. Application to become an OSHA Training Institute Education Center (OTI Education Center)
B. OTI Education Center Monthly Summary Report for OTI Education Centers and Outreach Training Program Activities
D. Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker Outreach Programs)
E. Online Outreach Training Program Report
F. Active Trainer Lists
I. Outreach Online Training Certification Statement
J. Instructor and Staff Resumes
K. Course Materials Upon Request by OSHA from OTI Education Centers upon Requests

Beginning with the FY 2010 reporting period, program participants will have the option to complete and submit the following data electronically:

    C. "Statement of Compliance with Outreach Training Program Requirements"
    L. Course Schedules from OTI Education Centers

Due to the nature of the material requested, currently program participants are required to manually submit the following:

    G. OSHA Training Institute Student Surveys
    H. Attendance Documentation for OTI Education Centers

With regard to G, students must complete the OSHA Training Institute Student Survey (OSHA Form 49 11-05 Edition) manually because it is not available using advanced information technology and the collection is made in a classroom setting or are mailed to participants who complete training online. OSHA is continuing to explore electronic-information techniques for use in the future.

With regard to H, OTI Education Centers submit copies of student attendance documentation which includes multiple student signatures. However, if the attendance documentation is scanned into .PDF format, the OTI Education Centers may send documentation electronically to the Agency.

Whenever possible, the Agency is making efforts to allow electronic submissions in order to increase efficiency and consistency, and minimize the burden on program participants.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

This information is not available in any other manner. The paperwork requirements of the documents listed above are specific to each student, trainer, or OTI Education Center involved, and no other source or agency duplicates these requirements or can make the required information available to OSHA.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

The collection of this information does not have a significant economic impact on small entities. The information provided to OSHA from the OTI Education Centers and the Outreach Trainers imposes a minimal burden on the students, trainers, and/or OTI Education Centers. When ever possible, the Agency is

making efforts to allow electronic submissions in order to minimize the burden to the program participants.

6. Describe the consequences 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.

Without this information the agency would be unable to determine the extent to which OSHA's overall training goals and objectives are met.

Additionally, the number of workers receiving safety and health training via the OSHA Outreach Training Program may decline and the rate of accidents, injuries, and even death will likely increase. Without the collection of the data, monitoring, and reporting requirements, the Program may be subject to fraudulent activity.

7. Explain any special circumstance(s) that would cause information collection to be conducted in a manner:

(1) requiring respondents to report information to the agency more often than quarterly;

Data collected monthly from OTI Education Centers provide appropriate level of program oversight and an opportunity to timely reconcile reporting discrepancies.

Trainer data collected as courses are delivered to verify course information and ensure timely dissemination of student completion cards to course attendees.

Active trainer lists are required to ensure workers are informed where they can obtain safety and health training. The Trainer Watch List is required to prevent additional program misconduct, fraud, and/or abuse.

(2) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

The Agency does not require respondents to prepare a written response to a collection of information in fewer than 30 days after receipt.

(3) requiring respondents to submit more than an original and two copies of any document;

There are no instances where the Agency requires the submission of an original and two copies of any document.

(4) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

OTI Education Centers record retention is based on the organizations' policy.

Outreach Training Program records are retained by OSHA, the OTI Education Centers, and the authorized trainers for five years to ensure the identification of students and records associated with a trainer during the trainer's authorization period. This also ensures that students are able to obtain replacement cards when they are lost or misplaced.

(5) 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;

Not applicable.

(6) requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

Not applicable.

(7) 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

Not applicable.

(8) 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.

Not applicable.

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 instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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 September 22, 2009 (74 FR 48293, Docket No. OSHA-2009-0022) requesting public comment on the information collection requirements contained in the Requirements for the OSHA Training Institute Education Centers Program and OSHA's Outreach Training Program. This notice was part of a preclearance consultation program intended to provide those interested parties the opportunity to comment on OSHA's request for Office of Management and Budget (OMB) approval of the information collection requirements found in OSHA's. The Agency received one comment from Mr. Parascos Pandelos (Document OSHA-2009-0022-0003).

Mr. Pandelos agreed with OSHA in that tracking outreach training is important. Mr. Pandelos expressed concern that some authorized trainers are not providing sufficient information and knowledge to their students and that tracking may increase accountability. The OSHA Outreach Training Program is voluntary. However, because OSHA outreach-related training is often becoming a requirement for gaining employment, the Outreach Training Program has experienced some instances of fraudulent activity. OSHA will continue to counteract instances of fraudulent activity related to the program by adding control measures. OSHA also believes that establishing routine reporting processes, requiring trainer compliance, and tracking training activities will result in a product and system which will instill confidence within employers and workers across the country. The required reporting of training content will address Mr. Pandelos's concerns.

9.   **Explain any decision to provide any payment or gift to respondents, other than remuneration of 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 for the assurance in statute, regulations, or agency policy.**

The Agency provides no assurance of confidentiality regarding the information that is collected from OTI Education Center applicants or data received from the OTI Education Centers.

Participants understand that if approved to participate in the OSHA Training Institute Education Center or the OSHA Outreach Training Program, their application/information becomes public record. 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 of 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.

Summary of Burden Hours, Costs and Responses

Collection of Information requirement	Burden Hours	Costs	Responses
A. Application to become an OSHA Training Institute Education Center (OTI Education Center)	600	$18,192	10
B. OTI Education Centers Monthly Course Summary Report (OSHA Form 4-50.8) OTI Education Centers and Outreach Training Program Activities (OSHA Form 4-50.9)	1,200	$30,546	600

Collection of Information requirement	Burden Hours	Costs	Responses
C. "Statement of Compliance with Outreach Training Program Requirements" (proposed)	0	$0	0
D. Outreach Training Program Report Forms:	9,151	$266,294	36,602
Construction (OSHA Form 4-50.1)			
General Industry (OSHA Form 4-50.2)			
Maritime (OSHA Form 4-50.3)			
Disaster Site Worker (OSHA Form 4-50.4)			
E. Outreach Reporting Required for Online Trainers (OSHA From 4-50.5)	62	$1,804	365
F. Active Trainer List (proposed)	24	$698	300
G. OSHA Training Institute Student Survey (OSHA Form 49 11-05 Edition) (proposed) (OMB 1225-0059)	0	0	0
H. Attendance Documentation for OTI Education Centers	3	$65	100
I. Outreach Online Training Certification Statement	10	$291	60
J. Instructor and Staff Resumes	1	$29	25
K. Course Material Upon Requests by OSHA from OTI Education Centers	75	$3,728	25
L. Course Schedules from OTI Education Centers (proposed)	9	$262	50
Totals	**11,135**	**$321,909**	**38,137**

OSHA's estimates of the burden hours and costs for each information-collection requirement are calculated below. Costs and burden hours are rounded to total dollar and hour amounts. The number of applications, OTI Education Centers, and Outreach Trainers, and students trained are based on previous numbers submitted or the most current data available at this time. In addition, the Agency

uses the following wage rates in making the cost determination for the
Information Collection Requests: [4]/

- Manager $43.71
- Employee: $29.10
- Clerical: $21.81

A.   Title: **Application to become an OSHA Training Institute Education
       Center (OTI Education Center).**

       OSHA publishes a notice announcing the opportunity for interested
       nonprofit organizations to become an OTI Education Center. In 2002, the
       Agency received approximately 45 applications; and in 2007, the Agency
       received approximately 50 applications. Given OSHA only publishes
       notices approximately every five years, we have annualized the number of
       application to 10 (45 + 50 = 95 / 2 = 47.5 / 5 years = 9.5).

Number of Responses (# of OTI Education Centers)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
10	1 time	10 hours	100 hours	$43.71 (manager)	$4,371
10	1 time	40 hours	400 hours	$29.10 (employee)	$11,640
10	1 time	10 hours	100 hours	$21.81 (clerical)	$2,181
Totals			**600 hours**		**$18,192**

B.   Title: **OTI Education Center Monthly Summary Report for the OTI
       Education Centers and Outreach Training Program Activities.**

       **B1. OSHA Training Institute Education Centers Reporting
       (OSHA Form 4-50.8):**

       OTI Education Centers must submit monthly information to the
       Directorate of Training and Education (DTE), Office of Training and
       Educational Programs, including: course numbers/titles, OTI Education
       Center name, dates and locations of training courses (training location
       city, state, or country if outside the U.S.), number of students trained,
       number of students attempting exams, number of students passing exams,

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[4] / These hourly wage rates have been derived from the May 2007 National Industry-Specific Occupational
Employment and Wage Estimates published by the Bureau of Labor and Statistics. These wages have been adjusted
to reflect the fact that fringe benefits comprise roughly 29.3 percent of total employee compensation in the private
sector. The costs of labor used in this analysis are therefore estimates of total hourly compensation.

student contact hours, course chairperson, instructor names, and demographic student breakdown (Federal OSHA Personnel, Other Federal Agency Personnel, State OSHA Personnel, Other State Personnel, Private Sector Personnel; U.S. Students, or Foreign Students).

Based on the wage rates referenced above, each OTI Education Center expends approximately two hours per month preparing and submitting a monthly summary report. One hour is allocated by a general employee earning $29.10 per hour and the other hour is allocated towards the preparation of the monthly summary report by clerical staff earning approximately $21.81.

Number of Responses (# of OTI Education Centers)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
25	Monthly	1 hour	300	$29.10 (employee)	$8,730
25	Monthly	1 hour	300	$21.81 (clerical)	$6,543
Totals			**600**		**$15,273**

B2. OSHA Outreach Training Program Reporting (OSHA Form 4-50.9): OTI Education Centers collect outreach trainer data (see item D, Outreach Training Program Reports) and process these requests. Each month, they report the number of classes and the number of students in each type of outreach training that they processed during the month. Trainer requests for student cards are processed by the OTI Education Center where the Trainer received training. OTI Education Centers receive their outreach training card supply from the Directorate of Training and Education (DTE), Office of Training and Educational Programs.

Number of Responses (# of OTI Education Centers)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
25	Monthly	1 hour	300	$29.10 (employee)	$8,730
25	Monthly	1 hour	300	$21.81 (clerical)	$6,543
Totals			**600**		**$15,273**

C.   Title: "**Statement of Compliance with Outreach Training Program Requirements" (proposed)**

OTI Education Centers are the primary administrators of the OSHA Outreach Training Program. As a heightened measure to address concerns regarding outreach trainer misconduct or fraudulent activity with the Outreach Training Program, OSHA is asking each OTI Education Center to gather a Statement of Compliance for each student who completes any of the train-the-trainer courses. [5]/ At the end of each trainer course, the OTI Education Centers will have each student sign and return the Statement of Compliance to the OTI Education Center and the OTI Education Center will retain the Statement of Compliance as part of the outreach trainer's permanent file.

OSHA believes the Statement of Compliance is **not** within the definition of "information" under 5 CFR 1320.3(h)(1). This Statement does not entail additional burden other than that necessary to identify the respondent, the date and the nature of the instruction (training course information). Therefore, the Agency has provided no burden hours as the Statement of Compliance is not within the definition of "information" and/or generally includes customary and usual business practices.

D.   Title: **Outreach Training Program Report Forms (includes Construction (OSHA Form 4-50.1), General Industry (OSHA Form 4-50.2), Maritime (OSHA Form 4-50.3) and Disaster Site Worker (OSHA Form 4-50.4 Outreach Programs)**

Upon completion of each outreach course, the trainer must submit information as stated under Item 2, B2. OSHA estimates that for each course the trainer will take 15 minutes (.25 hour) to obtain, document and submit the required information. The number of courses has been averaged over a three year period, 2006 through 2008.   For purposes of estimating courses, the Agency estimates that an Outreach Trainer earns approximately $29.10 per hour:

Estimated Number of Courses	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
36,602	After each outreach course	.25 hour	9,151	$29.10 (employee)	$266,294

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[5] / The train-the-trainer courses currently include the following: #500 - Trainer Course in Occupational Safety and Health Standards for the Construction Industry; #501 - Trainer Course in Occupational Safety and Health Standards for General Industry; #502 - Update for Construction Industry Outreach Trainers; and #503 - Update for General Industry Outreach Trainers; #5400 - Trainer Course in OSHA Standards for the Maritime Industry; #5600 - Disaster Site Worker Train-the-Trainer Course; and #5602 - Update for Disaster Site Worker Trainer Course.

E.   Title: **Outreach Reporting Required for Online Trainers (OSHA 4-50.5)**

Upon completion of each online outreach course, the online provider must collect information as stated under Item 2, E above. Depending on the number of online programs offered, the online providers provide a report, no more than twice a month, to the Directorate of Training and Education, Office of Training and Educational Programs. OSHA estimates the number of reports received per year at 365 and that for each course the online provider conducts, it will take approximately 10 minutes (.17 hour) to obtain, document and submit the required information. For purposes of estimating courses, the agency estimates that a Trainer earns $29.10 per hour:

Estimated Total Number of Reports per year (averaged)	Frequency of Response Varies	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
365	1	.17 hour	62	$29.10 (employee)	$1,804

F.   Title: **Active Trainer List (proposed)**

The OTI Education Center collects information concerning outreach trainers who have conducted two or more courses per year. Since this information is readily available (Necessary information is being provided when Trainers request student cards for their students), OSHA assumes that it will take approximately 5 minutes (.08 hour) per month for the OTI Education Centers to prepare and submit this report electronically.

Estimated Number of Responses (per year)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
25	Monthly	.08 hour	24	$29.10 (employee)	$698

G.   Title: **OSHA Training Institute Student Survey (OSHA Form 49 11-05 Edition) (proposed) (OMB 1225-0059)**

The OSHA Directorate of Training and Education (DTE) conducts courses on occupational safety and health provided through the OSHA Training Institute (OTI) and the OTI Education Centers Program.

Since the OTI Education Centers Program currently includes 25 OTI Education Centers around the country, DTE would like to modify the current OSHA Training Institute Student Survey to include the OSHA Region, the identity of the OTI Education Center, the city and state where the training was conducted.

The information on this survey is obtained from students upon completion of training by the OTI Education Centers. OSHA uses this information to evaluate the usefulness and effectiveness of the course content and instruction.

Training classes vary in the type of delivery (instructor led classroom training, computer-based training, and blended). Some parts of the survey may not apply to some classes. Students answer each question on the Course Evaluation form by filling in the box that corresponds to their rating for that course element. Each box has a numeric value that is processed by computer for tabulation of the data. The forms are processed through an optical reader linked to a personal computer. The computer automatically tabulates the rating scores for each Student Survey form and an overall score for the course

The burden hours are not included in this PRA since the burden hours are being captured in another OMB Approval Process for No. 1225-0059.

H.   Title: **Attendance Documentation for OTI Education Centers**

The Agency requires the OTI Education Centers to collect daily student sign-in sheets for each course conducted; however, the Agency only requests this information during random audits on a quarterly basis. For reporting purposes, an attendance roster is created with the printed name of the students registered for each OTI numbered course.

Each student is required to sign their name next to their printed name. OSHA requires the OTI Education Centers keep an attendance roster for each day the course is offered. OSHA also requires the instructor to sign the attendance roster to certify the attendance documentation is accurate. Since all OTI Education Centers have electronic registration, the printed name of registered students is readily available.

OSHA believes the daily training roster is not within the definition of "information" under 5 CFR 1320.3(h) (1). The daily training roster does not entail additional burden other than to identify the student, the date, and the course name and signature of trainer. However, OSHA will take a minimum burden for OTI Education Centers to provide this information to OSHA during quarterly audits.

OSHA assumes that it will take approximately 3 minutes (.05 hour) for the OTI Education Centers to provide the daily student training roster to OSHA.

Estimated Number of Education Centers (per year)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
25	Quarterly	.03 hour	3	$21.81 (clerical)	$65

I.   Title: **Outreach Online Training Certification Statement**

At a minimum, an Outreach Online Training provider must provide to the Directorate of Training and Education a bi-annual report (essentially a negative report) or must immediately report any significant changes made to an Outreach Online Training Program. The Outreach Online Training provider is required to sign a statement of certification that the online OSHA training courses have been conducted in accordance with the current OSHA Outreach Training Program Guidelines and document in detail any changes made. If no changes are implemented, the Outreach Online Program provider must provide the Directorate of Training and Education a negative report.

OSHA currently has 30 accepted online Outreach Training programs. OSHA estimates the average organization will take 10 minutes (.17 hour) per accepted program to obtain, document, and submit the required information. For purposes of estimating courses, the agency estimates that a Trainer earns $29.10 per hour:

Estimated Number of Programs (per year)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
30	2 x per year	.17 hour	10 hours	$29.10 (employee)	$291

J.   Title: **Instructor and Staff Resumes (this includes anyone who may be assigned to conduct OSHA classes, whether an online provider, contractor, subcontractor, employee, adjunct professor, etc.)**

During the application process for new OTI Education Centers or as new staff is hired or changes are made, the Agency requires the OTI Education Centers to provide OSHA with a copy of the resume of the instructor and/or their staff. The Agency encourages the submission of the resumes in an electronic format (via email). Since it is likely that the OTI Education Center receives the resumes electronically, OSHA estimates

that it will take the OTI Education Center Director or their staff approximately 3 minutes (.05 hour) to submit the required information. For purposes of estimating courses, the agency estimates that an OTI Education Center employee earns $29.10 per hour.

Estimated Number of Instructors/Staff personnel	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
25	1 x or when staff changes are made	.05 hour	1	$29.10 (employee)	$29

K.   Title: **Course Material Upon Requests from OTI Education Centers**

On an as-needed basis, the Directorate of Training and Education requests the OSHA Training Institute Education Centers to provide curriculum related content, manuals, test questions, etc. in order to monitor program content and ensure quality and consistency. These materials are provided to the Directorate of Training and Education, Office of Training and Educational Programs.

Since most of the materials have already been created or are in existence, the Agency calculates the burden by using 3 hours as the average yearly total.

Estimated Number of Responses (per year)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
25	Varies	3 hours	75	$43.71 (manager)	$3,728

L.   Title: **Course Schedules from OTI Education Centers (proposed)**

This collection of this information is voluntary. Quarterly or as course schedules are updated, the OTI Education Centers may provide information for their upcoming courses.

OSHA estimates that each OTI Education Center will likely update their course schedules a minimum of two times per year. Since course schedules will already likely be available electronically, the Agency estimates it will take 10 minutes (.17 hour) to obtain, document and submit the course catalogue electronically to the computer server. For purposes of estimating courses, the Agency estimates that an employee at the OTI Education Center earns $29.10 per hour:

Estimated Number of Respondents	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
25	2 x per year	.17 hour	9	$29.10	$262

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 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.

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

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

To determine the costs to the Federal Government, the Agency estimated how much time the government spends on each information-collection requirement, and then totaled the burden hours for all of the collection of information requirements. (See Table below – Burden Hours for Federal Government). OSHA estimates that 860 hours are spent on the collection of information requirements contained in the OSHA Training Institute Education Center Program, and the Outreach Training Program.

For each collection, several government employees at differing grades may be involved in processing, analyzing, and if necessary preparing reports. The Agency estimated the overall amount of time the government spends on each collection of information, and then determined that a GS 12, step 5 ($40.14) represents the average wage rate for the government staff working on these collections of information requirements.

The total cost to the Federal government is $34,520 (860 hours x $40.14 = $34,520 (rounded).

Burden Hours for
Federal Government

Collection of Information requirement	Action	Time per Response	Total Hours
A. Application to become an OSHA Training Institute Education Center (OTI Education Center)	Review 10 Applications	20 hours	200
B. OTI Education Center Monthly Summary Report, including Outreach Reporting	Review Summary Reports (25 x 12 = 300)	1 hour	300
C. Statement of Compliance with Outreach Training Program Requirements" (proposed)	Not Applicable: These Requirements are processed at the OTI Education Centers and costs are assumed under Item 12.		N/A
D. Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker Outreach Programs)			

Collection of Information requirement	Action	Time per Response	Total Hours
E. Outreach Reporting Required for Online Trainers	Review and process 365 student completion card requests and report same	.33 hours	120 hours
F. Active Trainer List (proposed)	Ensure receipt of Active Trainer Lists from 25 OTI Education Centers; file, compile and send out Active Trainer Lists as requested by potential students (average requests per month = 300. (25 + 300 = 325)	.08 hours	26 hours
G. OSHA Training Institute Student Survey (OSHA Form 49 11-05 Edition) (proposed) (OMB 1225-0059)	Federal Costs taken under DOL's Customer Satisfaction Survey (1225-0059)		N/A
H. Attendance Documentation for OTI Education Centers	OSH Education Centers – 100 requests for student rosters	1 hour to analyze/compare to monthly reports	100
I. Outreach Online Training Certification Statement	Analyze Online Training Certifications (25 x 2)	.25 hour	13 (rounded)
J. Instructor and Staff Resumes	Review new resumes/ approximately 25	.50 hour	13 (rounded)
L. Course Material Upon Requests from OTI Education Centers	Review new Course materials (25 Education Centers)	1.5 hour	38
M. Course Schedules from OTI Education Centers (proposed)	Review 50 updated course materials	1 hour	50
TOTAL			860

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 change increase of 11,135 hours. OSHA has identified a set of collections of information necessary for operating the Agency's two educational programs, the OSHA Training Institute (OTI) Education Centers Program and OSHA Outreach Training Program. The OTI Education Centers are non-profit organizations that provide training at their location. The Outreach

Training Program trains individuals who become authorized to train other individuals. The trainers determine when and where training sessions will be held.

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 the report, publication dates, and other actions.**

Not applicable.

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 expiration date will be displayed on the data collected.

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 to the certification statement.

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

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on Form OMB 83-I is checked "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed.

Item 17 on Form OMB 83-I is checked "No."