

**SUPPORTING STATEMENT FOR
THE INFORMATION COLLECTION REQUIREMENTS FOR THE
STANDARDS IMPROVEMENT PROJECT - PHASE III
(NOTICE OF PROPOSED RULEMAKING (NPRM))¹
OFFICE OF MANAGEMENT AND BUDGET (OMB)
CONTROL NO. 1218-0NEW (2010)**

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 Act's (OSH Act) main objective is 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" (29 U.S.C. 651). To achieve this objective, the OSH Act specifically authorizes "the development and promulgation of occupational safety and health standards" (29 U.S.C. 651).

For toxic substances, the OSH Act contains specific statutory language. Thus, as appropriate, health standards must include provisions for monitoring and measuring worker exposure, medical examinations and other tests, control and technological procedures, suitable protective equipment, labels and other appropriate forms of warning, and precautions for safe use or exposure (29 U.S.C. 655 and 657). In this regard, the OSH Act mandates "regulations requiring employers to maintain accurate records of employee exposure to potentially toxic materials or other harmful physical agents which are required to be monitored and measured," and further requires that employers notify workers exposed to concentrations over prescribed limits of this fact, and of the corrective action they are taking (29 U.S.C. 657).

The OSH Act also mandates that "[e]ach employer shall make, keep and preserve, and make available to the Secretary [of Labor] . . . such records regarding [his/her] activities relating this Act as the Secretary . . . may prescribe by regulation as necessary or appropriate for the enforcement of this Act" (29 U.S.C. 657). The OSH Act states further that "[t]he Secretary . . . shall prescribe such rules and regulations as [he/she] may deem necessary to carry out [his/her] responsibilities under this Act, including rules and regulations dealing with the inspection of an employer's establishment" (29 U.S.C. 651). The Agency is publishing a Notice of Proposed Rulemaking (NPRM) proposing to delete and revise a number of provisions in existing OSHA standards. Items 2 and 12 below describe these proposed changes in detail.

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.

¹The purpose of this Supporting Statement is to analyze and describe the burden hours and costs associated with provisions of the proposed rulemaking that contain paperwork requirements; it does not provide the general rationale for these provisions, only the rationale for the paperwork requirements specified by these provisions.

A. Proposal to Remove Requirements to Transfer Exposure and Medical Records to the National Institutes for Occupational Safety and Health (NIOSH)

The NPRM proposes to remove provisions in OSHA's substance-specific standards that require employers to transfer worker exposure monitoring and medical records to NIOSH (see Table 1 below for a list of these provisions). Many OSHA standards, including its substance-specific standards in 29 CFR 1910, subpart Z and 29 CFR 1910.1020 (Access to Employee Exposure and Medical Records), require employers to transfer to NIOSH medical and exposure records when: an employer ceases to do business and leaves no successor; the period for retaining the records expires; or a worker terminates employment (including retirement or death). OSHA is proposing to remove these record-transfer provisions because evidence in the record submitted by NIOSH indicates that the records serve no useful occupational safety and health research purpose (which is NIOSH's principle mission).

B. Proposal, and Consideration, to Remove Requirements for Training-Certification Records

OSHA is proposing in the NPRM to remove paragraph (f)(4) of the general industry Personal Protective Equipment (PPE) standard (29 CFR 1910.132), paragraph (e)(4) of the shipyard employment PPE standard (29 CFR 1915.152), and paragraph (n)(4) of the general industry and construction Cadmium standards (29 CFR 1910.1027 and 29 CFR 1926.1127), which require employers to prepare and maintain a written record certifying compliance with the training requirements of these sections. These provisions require employers to verify that affected workers received training as required by the standards through a written certification record that includes, at a minimum, the name(s) of the workers trained, the date(s) of training, and the types of training the workers received. The Cadmium standards for general industry and construction are the only substance-specific standards that require written certification to document training. In addition to these four provisions, OSHA is considering removing training-certification-record requirements from 12 other standards in the general industry, construction, and shipyard employment that require employers to prepare written records or documents to certify that they complied with training requirements. (See Table 2 below for a list of provisions containing requirements for training-certification records that OSHA is proposing, and considering, for removal.)

OSHA is proposing, and considering, these provisions for removal because it does not believe that the training-certification records required by the four standards listed previously provide a safety or health benefit sufficient to justify the time and cost to employers. OSHA believes that employers observe workers as they perform their jobs to ensure that work practices and personal-protective equipment are consistent with the training received. In addition, OSHA generally conducts enforcement of training requirements by observation and worker interviews; thus, the lack of a written record likely would not interfere with OSHA's enforcement of training requirements.

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.

Employers may use automated, electronic, mechanical, or other technological collection techniques, or other forms of information technology (e.g., electronic submission of responses), when establishing and maintaining the records OSHA is proposing for removal from its standards. The Agency wrote the paperwork requirements of the standards in performance-oriented language, i.e., in terms of what data to collect, not how to record the data.

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 requirements to collect and maintain information proposed for removal are specific to each employer and worker involved, and no other source or agency duplicates these requirements or can make the required information available to OSHA (i.e., the required information is available only from employers). At this time, there is no indication that any alternate information source available.

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

The information collections proposed for removal do not have a significant impact on a substantial number of small entities.

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.

OSHA believes that removal of the information collection requirements would not have consequences on Federal program or policy activities, and that no technical or legal obstacles exist to removing these requirements.

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.

No special circumstances exist for the information collection requirements proposed for removal that require employers to collect information in the manner or using the procedures specified by this item. These information collection requirements are consistent with the guidelines set forth 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 received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As required by the Paperwork Reduction Act of 1995 (44 U.S.C.2506 (c)(2)(A)), OSHA is requesting public comment on its proposal to remove the information collection requirements specified below in Tables 1 and 2 under Item 12. To comment on the paperwork requirements in this proposal, please submit written comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, Room 10235, New Executive Office Building, Washington, DC 20503; Attn: OSHA Desk Officer (RIN-1218-AC19). The Agency also encourages commenters to submit their comments on these paperwork requirements to the rulemaking docket, along with their comments on other parts of the proposed rule. Commenters may submit their comments by using the Federal eRulemaking portal at <http://www.regulations.gov>. OSHA posts comments and submissions without revision; therefore, OSHA cautions commenters about submitting personal information such as Social Security numbers and date of birth. Information on using the <http://regulations.gov> Web site to submit comments, and to access the docket, is available at the Web site's "User Tips" link. For instructions on when to submit comments to the rulemaking docket, as well as other means of submitting comments, see the sections of the *Federal Register* notice announcing the proposed rule titled "Dates" and "Addresses." The notice is part of a preclearance consultation program to provide interested parties the opportunity to comment on OSHA's request for removing these provisions prior to approval by the Office of Management and Budget (OMB) of this action. The Agency will respond to any comments received in response to its request.

In a 2006 Advance Notice of Proposed Rulemaking (ANPRM) (71 FR 76623, December 21, 2006), the Agency identified a number of standards as potential candidates for revision under Standards Improvement Project – Phase III. OSHA identified these standards from an extensive review of its standards, as well as recommendations and comments from the public and OMB. (OMB based its recommendations on comments it received to a 2005 report entitled, "Regulatory

Reform of the U.S. Manufacturing Sector.”²) The ANPRM invited comments on the standards identified for revision, and recommendations for additional standards for inclusion in the NPRM. Many stakeholders encouraged OSHA to continue its efforts to improve its standards by removing or revising requirements that are outdated, duplicative, or inconsistent. In the NPRM, OSHA is proposing to make substantive revisions to a number of provisions identified through this process. Accordingly, in the proposal, OSHA is soliciting comments from the public on these proposed revisions, as well as on the estimated reductions in the costs and burden hours associated with removing the information collection requirements from a number of these standards.

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

The proposed action involves no payments or gifts.

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

The proposed action involves no elements of confidentiality.

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.

There is no sensitive information associated with the proposed action.

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.

- 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 13.

Annual Burden-Hour and Cost Determinations

²To view the full Regulatory Reform report, please visit:
http://www.whitehouse.gov/omb/infoereg/reports/manufacturing_initiative.pdf.

Proposal to Remove Requirements to Transfer Exposure and Medical Records to NIOSH and Proposal, and Consideration, to Remove Requirements for Training-Certification Records

Table 1 below provides the annual burden-hour and cost reductions estimated by OSHA that result from the proposed removal of the provisions contained in its standards requiring employers to transfer worker exposure monitoring and medical records to NIOSH under specified conditions. Table 2 below provides the same information for provisions containing requirements for training-certification records that OSHA is proposing, and considering, for removal from its standards.

The burden-hour and cost estimates listed in Tables 1 and 2 are valid as of June 1, 2010; these estimates are subject to revision under information collection requests made by OSHA after this date. In addition, these tables contain no entries for current burden hours, proposed burden hours, current cost, and proposed cost because the current burden hours and current cost are the same values listed under “Change (Burden Hours)” and “Change (Cost)” without the minus signs, while the proposed burden hours and proposed cost have a value of zero. The burden-hour and cost estimates in Table 2 also include the time and cost required for employers to provide OSHA compliance officers with copies of the training-certification records.

For information on the methods used by OSHA to determine current burden-hour and cost estimates for the provisions in any of the standards containing the information collection requirements proposed for removal, retrieve the most recent information collection request for the standard by following these steps:

- (1) Go to <http://www.reginfo.gov>;
- (2) Select “Information Collection Review” from the top panel;
- (3) Click on “Search” from the drop-down panel;
- (4) In the panel labeled “ICR Reference Number,” enter the ICR reference number listed for the standard in either Table 1 or 2 below;
- (5) Click on “Search” at the bottom of the page;
- (6) On the page titled, “Information Collection Search Results,” click on the entry under “Title”;
- (7) In the top panel on the page titled, “View ICR-OIRA Conclusion,” click on “View Supporting Statement and Other Documents”;
- (8) On the page titled, “ICR Documents,” click on the entry under “Supporting Statement A”; and
- (9) Scroll down this document (the Supporting Statement) to Item #12, and find the appropriate provision under “Burden Hour and Cost Determinations.”

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

• **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 collections 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.

OSHA estimates that a capital-cost decrease of \$2,929/year will result from the proposed revisions to the record-transfer provisions because employers would no longer have to mail worker exposure and medical records to NIOSH.

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.

The NPRM estimates a cost savings of \$20,670 to the Federal government as follows:

(A) The Federal government would save the cost of reviewing training-certification records. For most of the standards that have a training-certification requirement, the cost for an OSHA compliance officer to review a training-certification record is *de minimus*, and is included in the cost determinations associated with reviewing entire training records required by other provisions of a standard. However, for the Telecommunications standard (29 CFR 1910.268), OSHA did estimate directly the cost to the Federal government for a compliance officer to review training-certification records; this cost was \$2,025 (see this determination at <http://www.reginfo.gov> under ICR No. 200811-1218-004). Therefore, OSHA would save this cost should the proposed revisions become final.

(B) The Federal government also would save \$18,645 for the cost of processing exposure-monitoring and medical records received from employers. For each standard listed in Table 1, OSHA reviewed Item 14 of the corresponding ICR, which describes cost to the Federal government, and determined that removing provisions requiring the transfer of exposure-monitoring and medical records to NIOSH will save the government.

15. Explain the reason for any program changes or adjustments.

The program change exemplified by the 2,642,300 burden-hour reduction would result from the proposed removal of information collection requirements from various OSHA standards requiring employers to (1) transfer worker exposure and medical records to NIOSH under

specified conditions; and (2) generate and maintain worker training-certification records. (See Tables 1 and 2 below for the specific standards involved.)

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.

OSHA will not publish the collection of information.

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

There are no forms associated with this proposed action on which to display an expiration date.

18. Explain each exception to the certification statement.

OSHA is not seeking such an exception.

Table 1: Burden Reductions Broken Out by OMB Control Number

<u>Burden-Hours and Cost Reductions for Removing Requirements to Transfer Exposure and Medical Records to NIOSH</u>				
<i>Standard and Provision</i>	<i>OMB Control Number</i>	<i>Existing Burden Hours</i>	<i>Reduction</i>	<i>Requested Burden Hours</i>
Vinyl Chloride—29 CFR 1910.1017 (m)(3)	1218-0010	712	-1	711
Cotton Dust—29 CFR 1910.1043(k)(4)(ii) and (iii)	1218-0061	35,742	-3	35,739
Access to Employee Exposure and Medical Records—29 CFR 1910.1020(h)(3)(i),(ii) and (h)(4)	1218-0065	665,009	-2939	662,070
Commercial Diving Operations—29 CFR 1910.440(b)(5)(ii)	1218-0069	205,397	-301	205,096
13 Carcinogens (4-Nitrobiphenyl, etc.)—29 CFR 1910.1003(g)(2)(i) and (ii)	1218-0085	1604	-6	1,598
Lead—29 CFR 1910.1025(n)(5)(ii) and (iii)	1218-0092	1,225,255	-2	1,225,253
1,2 Dibromo-3-Chloropropane—29 CFR 1910.1044(p)(4)(ii) and (iii)	1218-0101	1	0	1
Inorganic Arsenic—29 CFR 1910.1018 (q)(4)(ii) and (iii)	1218-0104	385	-1	384
<i>Standard and Provision</i>	<i>OMB Control</i>	<i>Existing Burden</i>	<i>Reduction</i>	<i>Requested Burden</i>

	<i>Number</i>	<i>Hours</i>		<i>Hours</i>
Ethylene Oxide—29 CFR 1910.1047(k)(5)(ii)	1218-0108	42,732	-3	42,729
Acrylonitrile—29 CFR 1910.1045(q)(5)(ii) and (iii)	1218-0126	3166	-3	3,163
Coke Oven Emissions—29 CFR 1910.1029(m)(4)(ii) and (iii)	1218-0128	52,701	-3	52,698
Benzene—29 CFR 1910.1028(k)(4)(ii)	1218-0129	126,184	-1	126,183
Occupational Exposure to Hazardous Chemicals in Laboratories—29 CFR 1910.1450(j)(2)**	1218-0131	281,419	-333	281,086
Asbestos—29 CFR 1910.1001(m)(6)(ii)	1218-0133	11,933	-1	11,932
Asbestos—29 CFR 1926.1101(n)(8)(ii)	1218-0134	4,957,808	-4	4,957,804
Formaldehyde—29 CFR 1910.1048(o)(6)(ii) and (iii)**	1218-0145	327,535	-2	327,533
1,3-Butadiene—29 CFR 1910.1051(m)	1218-0170	955	-3	952
Methylene Chloride—29 CFR 1910.1052(m)(5)**	1218-0179	67,362	-1	67,361
Bloodborne Pathogens—29 CFR 1910.1030(h)(4)(ii)	1218-0180	14,059,435	0	14,059,435
Methylenedianiline—29 CFR 1926.60(n)(7)(ii)	1218-0183	1030	-1	1,029
Methylenedianiline—29 CFR 1910.1050(n)(7)(ii)	1218-0184	298	-1	297
Cadmium—29 CFR 1910.1027(n)(6)	1218-0185	92,259	0	92,259
Cadmium—29 CFR 1926.1127(n)(6)	1218-0186	39,331	0	39,331
Lead—29 CFR 1926.62(n)(6)(ii) and (iii)	1218-0189	1,363,803	-1	1,363,802
Asbestos—29 CFR 1915.1001(n)(8)(ii)	1218-0195	1624	-1	1,623
<i>Sub-total</i>		<i>23,563,680</i>	<i>0</i>	<i>23,562,992</i>

<u>Burden-Hour and Cost Reductions for the Training Certification Requirements Proposed for Removal</u>					
<i>Standard and Provision</i>	<i>OMB Control</i>	<i>Existing Burden</i>	<i>Change Burden</i>	<i>Requested Burden</i>	<i>Cost Change*</i>

	<i>No.</i>	<i>Hours</i>	<i>Hours</i>	<i>Hours</i>	
Cadmium—29 CFR 1910.1027(n)(4)	1218-0185	92,259	-1226	91,033	-\$26,371
Cadmium—29 CFR 1926.1127(n)(4)	1218-0186	39,331	-2100	37,231	-\$43,218
Personal Protective Equipment—29 CFR 1910.132(f)(4)	1218-0205	3,552,171	-1,855,180	1,696,991	-\$42,743,347
Personal Protective Equipment (PPE)—29 CFR 1915.152(e)(4)	1218-0215	2,827	-2776	51	-\$48,664
<i>Subtotal</i>		<i>3,686,588</i>	<i>-1,861,282</i>	<i>1,825,306</i>	<i>-\$42,861,600</i>
<u>Training-Certification Requirements Considered for Removal</u>					
<i>Standard and Provision</i>	<i>OMB Control No.</i>	<i>Existing Burden Hours</i>	<i>Change Burden Hours</i>	<i>Requested Burden Hours</i>	<i>Cost Change*</i>
Powered Platforms for Building Maintenance-- 29 CFR 1910.66(i)(1)(v)	1218-0121	135,656	-469	135,187	-\$11,247
Process Safety Management of Highly Hazardous Chemicals (PSM)--29 CFR 1910.119(g)(3)	1218-0200	4,795,505	-30,767	4,764,738	-\$627,954
Hazardous Waste Operations and Emergency Response (HAZWOPER)- 29 CFR 1910.120(e)(6), (p)(7)(i), (q)(6)(ii)-(v)	1218-0202	1,199,954	-3,352	1,196,602	-\$113,231
<i>Cont. Standard and Provision</i>	<i>Cont. OMB Control No.</i>	<i>Cont. Existing Burden Hours</i>	<i>Cont. Change Burden Hours</i>	<i>Cont. Requested Burden Hours</i>	<i>Cont. Cost Change*</i>

Permit-Required Confined Spaces-- §1910.146(g)(4)	1218-0203	1,475,091	-39,185	1,435,906	-\$805,251
The Control of Hazardous Energy (Lockout/ Tagout)--29 CFR 1910.147(c)(7) (iv)	1218-0150	3,013,603	-180,768	2,832,835	-\$3,947,973
Powered Industrial Trucks--29 CFR 1910.178(l)(1)-(3), (l)(6)	1218-0242	854,538	-29,785	824,753	-\$638,591
Logging Operations--29 CFR 1910.266(i) (10)(i)- (ii)	1218-0198	25,957	-3,329**	22,628	-\$56,105
Telecommunications--29 CFR 1910.268(c)	1218-0225	1,087	-1,087***	0	-\$38,958
Electrical Power Generation, Transmission, and Distribution--29 CFR 1910.269(a)(2) (vii)	1218-0190	34,208	-4,554	29,654	-\$65,851
Confined and Enclosed Spaces and Other Dangerous Atmospheres in Shipyard Employment--29 CFR 1915.12(d)(5)(i) and (ii)	1218-0011	312,774	-1,601	311,173	-\$35,996
Fire Protection in Shipyard Employment--29 CFR	1218-0248	4,635	-625	4,010	-\$22,408

1915.508(f)					
Training Requirements for Fall Protection--29 CFR 1926.503(b)	1218-0197	484,082	-481,885	2,197	-\$18,759,783
<i>Subtotal</i>		12,337,090	- 777,407	11,559,683	- \$25,123,348
Summary					
<i>Subcategory</i>		<i>Existing Burden Hours</i>	<i>Change in Burden Hours</i>		<i>Requested Burden Hours</i>
<i>Removing Requirements to Transfer Exposure and Medical Records to NIOSH</i>		23,563,680	0		23,562,992
<i>Training Certification Requirements Removal</i>		3,686,588	-1,861,282		1,825,306
<i>Training-Certification Requirements Considered for Removal</i>		12,337,090	-777,407		11,559,683
Total Reduction		39,587,358	-2,639,377		36,947,981

*The cost estimates in this table represent program changes associated with Item 12 of this Supporting Statement.

**In the previous information collection request for this standard, OSHA estimated specifically that employers took a total of 5 hours to disclose training-certification records to OSHA compliance officers; the burden-hour estimate in this table (3,329 hours) includes this 5-hour disclosure burden.

***In the previous information collection request for this standard, OSHA estimated specifically that employers took a total of 20 hours to disclose training-certification records to OSHA compliance officers; the burden-hour estimate in this table (1,087 hours) includes this 20-hour disclosure burden.