

**SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS OF THE
GRANTEE QUARTERLY PROGRESS REPORT
OFFICE OF MANAGEMENT AND BUDGET
(OMB) CONTROL NO. 1218-0100
(November 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) authorizes the Occupational Safety and Health Administration (OSHA) 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 purposes 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 workers to recognize, avoid, and prevent unsafe and unhealthful working conditions.

Under Section 21, the Agency awards training grants to nonprofit organizations to provide part of the required training. Organizations that receive these grants must submit the Grantee Quarterly Progress Report (GQPR; OSHA 171, Revised 8/10) as required by the Department of Labor under 29 CFR 95.51. This regulation states that grant recipients (grantees) must submit progress reports to the awarding agency at least annually, but no more than quarterly. The reports must contain a comparison of actual accomplishments with goals and objectives established for the reporting period and, if appropriate, the output of the program. Therefore, the GQPR allows OSHA to monitor a grantee’s performance and to determine if a recipient is using funds as specified in its grant application.

- 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.**

After receiving a GQPR, the Agency compares the information provided in the report to the quarterly milestones proposed by the grant recipient in the work plan and budget that accompanied its grant application. This information includes: identifier data (organization name and grant number); the date and location where the training occurred; the length of training (hours); the number of workers and employers attending training sessions provided by the organization during the quarter; a description of the training provided; a narrative account of grant activities during the quarter; and an evaluation of progress regarding planned versus actual work accomplished. Using this information, OSHA can determine if the grant recipient is meeting the proposed program goals and

objectives as described in the grant proposal, and are spending funds consistent with the proposed budget.

Requiring these reports on a quarterly basis enables the Agency to identify training and expenditure discrepancies in a timely fashion so that it can implement appropriate action. In addition, this information permits OSHA to assess a grant recipient's ability to meet projected milestones and expenditures.

- 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.**

Grant recipients are provided access to a downloadable GQPR via the OSHA website or through their OSHA Regional Office. Each grantee is required to submit the electronic version of the form via email to their OSHA Regional Office. The use of electronic format reduces the burden of double data entry and errors in data transfer. In addition, it aids OSHA in meeting their reporting requirements as required by the Department of Labor under 29 CFR 95.51

- 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 paperwork requirements of the GQPR are specific to each grant recipient, 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 the grant recipient).

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The GQPR obtains only the minimum information necessary for OSHA to monitor program goals and objectives, as well as grant expenditures, in a timely manner as required by Department of Labor regulation 29 CFR 95.51. OSHA receives applications from various non-profit organizations, some large and some small. Traditionally larger organizations apply. This information collection does not have a significant economic impact on 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.**

If OSHA could not collect the information provided on the GQPR, or obtained it less frequently (than quarterly), it could not intervene in a timely manner if the grant recipient fails to meet program goals and objectives or to spend the training funds in the manner specified in the grant proposal. Consequently, students may receive substandard training and the grant recipient could waste or misappropriate training funds.

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 secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The Agency believes that no special circumstances exist that would cause it to collect the information required by the GQPR in a manner, or using procedures, that differ from the description provided in Item 2 above.

8. If applicable, provide a copy and identify the data 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. 3506(c)(2)(A)), OSHA published a notice in the *Federal Register* on August 24, 2010 (75 FR 52035) requesting public comment on its proposal to extend the Office of Management and Budget's previous approval of the collection of information requirements specified by the Grantee Quarterly Progress Report. This notice was part of a preclearance consultation program that provided the general public and government agencies with an opportunity to

comment on this request. The Agency did not receive any comments in response to its notice.

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

OSHA will not provide payments or gifts to any grantee to complete the GQPR.

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

The Agency provides no assurance of confidentiality regarding the information collected in the GQPR because it believes that none of this information is confidential.

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 Agency believes that none of the information collected in the GQPR is sensitive.

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 estimate for estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collection of information, identifying and using appropriate wage rate categories. The cost of contracting out paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Over the last three years, (FY07-FY09), OSHA managed an average of 103 grants per year. The Agency estimates that it takes each grant recipient 12 hours per quarter, or 48 hours per year, to collect, compile, and maintain the information specified on the GQPR, including the narrative description of progress made in achieving program goals and objectives. OSHA divides the 48 hours required annually to complete four quarterly reports between professional staff and clerical staff as follows:

Average Annual Number of Grants Managed F07-FY09: 103	Professional Staff	Clerical Staff	Combined Totals
Burden Hours	24	24	48
Agency Rate	\$55.85	\$21.37	
Cost	\$1,340	\$513	
Total Burden Hours (x 103)	2,472	2,472	4,944
Total Cost (x Total Hours)	\$138,061	\$52,827	\$190,888

Therefore, the annual burden hours and cost of this paperwork requirement are:

Burden hours: 4,944 hours
Cost: \$190,888

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 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.**

Item 12 above provides the total cost of the information collection requirement associated with completing the GQPR.

14. Provide estimates of the 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 into single table.

The Federal government would incur a cost whenever it reviews a GQPR submitted by a grant recipient. As noted under Item 12 above, OSHA determined that it receives 412 such reports each year. The Agency estimates that it takes a professional, Program Analyst, GS-13, at a wage rate of \$55.85 per hour¹, 1 hour to review and process each report. In making this cost determination, OSHA does not account for other occupational costs (e.g., equipment, overhead, and support staff expenses) since these costs are normal expenses and would occur without this requirement. Therefore, the total annual cost for the Federal government to review these reports is:

$$412 \text{ reports} \times 1 \text{ hour} \times \$55.85 = \$23,010$$

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

OSHA is increasing the number of burden hours by 2,304 (from 2,640 hours to 4,944 hours) because the annual number of grants managed by the Agency increased from a three-year average of 55 to 103.

As outlined in OSHA Instruction Directive 02-00-003, the GQPR is required to be submitted in the Form 171 format. The instructions on FORM OMB No. 1218-0100 (Expires 10/31/2010) indicated this form may be used. Instructional wording on the form has been changed to match the OSHA Instruction Directive 02-00-003.

16. For collections of information whose results will be published, outline plans for tabulations 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.

OSHA will not publish the information collected by the GQPR.

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 is displayed on the grantee quarterly progress report (OSHA-171).

18. Explain each exception to the certification statement in ROCIS.

OSHA is not seeking an exception to the certification statement in ROCIS.

¹ Hourly wages for professional staff were based on the government pay scale for a Chicago area GS-13, step 10 (\$55.85). Usually applications are submitted by PhDs, certified safety professionals, certified Industrial Hygienists, and other professional staff. Hourly wages for clerical staff were based on the government pay scale for a Chicago area GS-5, step 10 (\$21.37). Clerical elements are performed by secretaries and accounting staff.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This supporting statement does not contain any collection of information requirements that employ statistical methods.