OMB No. 1290-0002
May 2011

Supporting Statement for Paperwork Reduction Act Submissions
U.S. Department of Labor / Office of Small and Disadvantaged Business Utilization
Vendor Outreach Session Information Management System

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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 Office of Small and Disadvantaged Business Utilization (OSDBU) administers the Department of Labor's responsibilities to ensure procurement opportunities for small, small disadvantaged, women-owned, HubZone, and small disadvantaged veteran-owned small businesses, and serves as the Department's central referral point for small business regulatory compliance information and questions.

   Federal agencies are required to promote procurement opportunities for small, small disadvantaged, and Section 8(a) businesses of the Small Business Act, as amended, (Public Law 95-507, Sections 8 and 15) and P.L. 100-656 (Sections 502 and 503). The Federal Acquisition Streamlining Act of 1994 (P.L. 103-355) mandates similar efforts for small women-owned businesses. Public Law 106-50 created the program for service-disabled veteran-owned small businesses. Public Law 105-135 established the HUBZone program and PL 85-536 established HUBZone goals. The Small Business Regulatory Enforcement Fairness Act of 1996 (P.L. 104-121) requires Federal agencies to make available to small businesses compliance guides and assistance on the implementation of regulations and directives of enforcement laws they administer.

   Further, Executive Order 13170 requires that Departments take a number of actions to increase outreach and maximize participation of small disadvantaged businesses in their procurements. Executive Order 13157 strengthens the executive branch's commitment to increased opportunities for women-owned small businesses.

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.**

   The Vendor Outreach Session Information Management System (VOSIMS) gathers, documents, and manages information for two Office of Small and Disadvantaged Business Utilization constituent groups: Small Businesses and Trade Associations as well as other key populations associated with the small business community. Via this system, the constituent groups have the opportunity to voluntarily provide to OSDBU information about their organizations. The information is used by OSDBU and DOL agencies to maximize communication with the respective constituent groups regarding relevant OSDBU and DOL programs, initiatives, procurement opportunities and compliance assistance; to track services and solicit feedback on customer service to group members; to facilitate registration of group members participating in OSDBU-sponsored activities; and, for security purposes, to facilitate tracking of attendees at VOS events held on U.S. Government property.

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 burdens.**

   In compliance with the Government Paperwork Elimination Act, information for the VOSIMS is collected via an electronic website. Small Business Vendors and Trade Associations are able to visit the website and voluntarily complete an automated registration form. The advantages of using an on-line website are: easy access by the two constituent groups; uniform collection of data to better facilitate comparison and analysis; more manageable (paperless) method for retaining and retrieving constituent data; and accessibility for OSDBU and DOL procurement officials.

4. **Describe efforts to identify duplication.**

   The small business component of the DOL VOSIMS is similar to the government-wide Central Contractor Registration (CCR) database of small businesses which is managed by the Small Business Administration. However, the DOL VOSIMS is designed to address specific DOL procurement needs (such as Job Corps) which are not addressed in the CCR, and to collect information on vendors who have particular interests in DOL procurement opportunities. Further, the volume of information on CCR limits its usefulness as an accessible, user-friendly search tool for meeting specific DOL procurement needs.

   OSDBU is not aware of any systems which provide communication with key constituent groups that pertain to DOL's acquisition opportunities and initiatives other than the VOSIMS.

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

Many of the respondents to this information collection will be small businesses. To limit the burden, this information will be collected via automated web-based forms. However, 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 the information is not collected, the effectiveness of OSDBU to serve the two identified constituency groups will be adversely affected. Compiling, updating, and tracking the information, as well as registering constituents for OSDBU-sponsored activities, would need to be done manually. A manual system has already proven to be a labor intensive, time consuming process which produces incomplete, inaccurate results. Allowing constituency group members an opportunity to update their own identifying and capability information will insure that the information gathered is more accurate and timely.

7. **Explain any special circumstances that would cause an information collection to be conducted.**

   No special circumstances have been identified for this system. The collection of information complies with 5 CFR 1320.5.

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.**

   In accordance with 5 CFR 1320.8(d), the Department published a 60-day pre-clearance notice in the FEDERAL REGISTER on March 8, 2011(Vol. 76, 12757) inviting interested parties to comment on this information collection.

   No public comments were received.

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

   No payments or gifts will be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. (Note: If the submission will serve as Joint ICR and Privacy Impact Assessment per OMB Memorandum 03-22, Section II.D, the relevant justification shall be included as part of the agency's response to this Item)

Respondents will be assured of privacy through the Privacy Act Notice which will appear in the VOSIMS.

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 are no questions of a sensitive nature.

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.

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

This information is generally readily available and will not require extensive research. The estimated hour burden is based on a pilot test of five small businesses conducted during the planning stages of the system and includes time to research and retrieve information. In the pilot, an average of seven (7) minutes was required to complete the registration information and an average of two (2) minutes was required to update the information. The number of respondents (1,000) and the number of responses (2,000) differ because it is likely that some respondents (approximately 1,000) will update their registration information more than once per year.

Registration for Small Businesses and Trade Associations:

1,000	initial responses	x .12 hours	= 120 hours	
1,000	update responses	x .03 hours	= 30 hours	
Total Hours				= 150 hours

The total annual burden hours costs to respondents or record keepers is anticipated to be $9309. The DOL calculated this estimate by multiplying 150 hours with the median average professional/manager hourly wage of $44.33 and increasing it by 40 percent to account for fringe benefits for a total of $62.06 per hour). *See National Compensation Survey—Wages*, Table 9, U. S. Department of Labor, Bureau of Labor Statistics, July 2003, http://www.bls.gov/ncs/ocs/sp/nctb1352.pdf.

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 A.12 and A.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.

There are no anticipated costs for responding to this collection of information.

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 A.12, A.13, and A.14 in a single table.

1. Total Costs (Contractor Costs): $0

2. Annual Maintenance Costs:

$0

No annual maintenance costs are anticipated.

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

There is no projected change in burden.

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.

Lists of small businesses with identifying information will be provided to DOL agencies on a quarterly basis (internal DOL distribution only).

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 for OMB approval will be displayed on the website forms.

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

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.