

**SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS FOR
VOLUNTARY PROTECTION PROGRAMS (VPP)
OFFICE OF MANAGEMENT AND BUDGET
(OMB) CONTROL NO. 1218-0239 (June 2011)**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Occupational Safety and Health Administration's (OSHA) mission is to prevent work-related injuries, illnesses, and deaths. OSHA's primary means of accomplishing this mission is the promulgation and enforcement of occupational safety and health standards. However, OSHA recognizes that it cannot accomplish its mission solely through the enforcement of such standards, and employs other strategies to accomplish its mission. One of these strategies is to encourage employers to implement comprehensive safety and health management programs.

OSHA's Voluntary Protection Programs (VPP), a partnership between labor, management, and government, is designed to recognize and promote excellence in safety and health management. Traditionally, OSHA only offered VPP recognition to fixed worksites.

In 2004, OSHA introduced the VPP Corporate and OSHA Challenge as pilot programs, and in 2006 OSHA introduced the Mobile Workforce for Construction pilot program. The VPP Corporate pilot program provided corporations committed to VPP and interested in achieving VPP recognition at facilities throughout their organization with more efficient means to accomplish this goal. The Mobile Workforce for Construction pilot was designed to reach out to smaller employers such as those engaged in specialty contracting where current VPP policies excluded employers who did not have authority for safety and health for the entire worksite. The OSHA Challenge pilot program provides a greater opportunity to eligible employers interested in working with OSHA to create safer and healthier workplaces for their employees.

In 2009, OSHA formalized two of the pilots – Mobile Workforce for Construction and VPP Corporate with the publication of the *Revisions to the VPP To Provide Safe and Healthful Working Conditions Federal Register Notice* (FRN). OSHA added to its traditional focus on individual VPP fixed worksites (site-based) by adding two new ways to participate: VPP Mobile Workforce and VPP Corporate. These revisions to the FRN clarified the multiple participation options now available within VPP. OSHA Challenge continues to be a pilot program.

Participation in VPP is strictly voluntary, and does not diminish existing employer and employee rights and responsibilities under the Occupational Safety and Health Act (OSH Act). In particular, OSHA does not intend to increase the liability of any party in an approved VPP site. Employees or any representatives of employees taking part in an OSHA-approved VPP safety

and health management programs are not assuming the employer's statutory or common law responsibilities for providing safe and healthful workplaces, or undertaking in any way to guarantee a safe and healthful work environment.

In order to participate in the VPP, OSHA requires an applicant to submit an application and an annual self-evaluation containing a detailed description of its safety and health management programs. OSHA needs this information to conduct a preliminary analysis of the worksite's programs, and to make a preliminary determination regarding the worksite's qualifications for VPP. Lacking this information, OSHA would consume thousands of person-hours conducting on-site evaluations at worksites that are not ready to qualify for the VPP.

In order to be recognized as a VPP worksite, applicants must adhere to the VPP programmatic requirements. VPP Star is the most prestigious recognition and has the most rigorous requirements; only sites with the most exemplary safety and health management programs achieve Star status. VPP Merit sites, meanwhile, have good safety and health management programs, but must take additional steps to reach VPP Star status. All VPP worksites are removed from programmed inspection lists for the duration of their participation. Un-programmed inspections occur at VPP worksites in response to all referrals, formal complaints, fatalities, and catastrophes.

Site-Based

Site-based way to participate continues VPP's traditional acceptance of applications from fixed worksites and some long-term construction sites. Within site-based VPP participation, OSHA accepts VPP applications from the owners and site officials who control site operations and have ultimate responsibility for assuring safe and healthful working conditions of: Private-sector fixed worksites in general industry and the maritime industry; Construction worksites/projects that will have been in operation for at least 12 months at projected time of approval and that expect to continue in operation for at least an additional 12 months; Federal-sector fixed worksites, and certain resident contractors.

VPP Corporate

VPP Corporate way to participate is intended for corporations who are committed to achieving VPP approval for multiple specified individual sites within their organization. The corporation must utilize well-established, standardized safety and health management programs at all participating sites, employ a prescreening process to ensure that their sites have effectively implemented the programs, addressed site-specific hazards, and satisfied the VPP requirements. Organizations who achieve VPP Corporate status are able to utilize streamlined application and on-site evaluation processes to bring into VPP individual sites.

Mobile Workforce

Mobile Workforce way to participate is intended to create greater opportunity for employers and employees in industries that did not qualify for the traditional VPP site-based way to participate. Mobile workforce participation is intended for: (1) applicants/participants whose employees move physically from one work project to another; and (2) applicants/participants who employees work as resident contractors at two or more fixed locations.

OSHA Challenge

OSHA Challenge is designed to reach and guide employers and companies in all major industry groups who are strongly committed to improving their safety and health management programs and possibly pursuing recognition in the VPP. OSHA Challenge provides participants a guide or roadmap to improve performance in managing safety and health at their worksites.

Special Government Employee (SGE) Program

The Special Government Employee (SGE) Program supports the VPP and provides the opportunity for safety and health professionals employed at approved VPP sites to assist and participate with OSHA on VPP on-site evaluations. Prior to participating on an on-site evaluation, the eligible SGE must apply to and receive from OSHA the formal SGE training class. Upon successful completion of the training course, the SGE may volunteer to participate on a VPP on-site evaluation team.

In 2008, OSHA modified the VPP procedures for all applicants/participants subject to OSHA standard 29 CFR 1910.119 and 1926.64 Process Safety Management (PSM). This standard covers all employers who either use or produce highly hazardous chemicals exceeding specified limits. The procedural modifications affected the applications, on-site evaluations, and annual participant self-evaluations process for these applicants/participants.

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.

Site-based and Mobile Workforce

OSHA Regional Office personnel use the initial VPP application to: (1) conduct a preliminary analysis of the applicant's safety and health management programs, and (2) make a preliminary determination regarding the applicant's qualifications for VPP. Once accepted, the VPP on-site evaluation team prior to conducting a VPP on-site evaluation reviews the application. If the applicant is approved for participation, federal personnel and possibly SGEs will use the application and subsequent annual evaluations to (1) justify continued participation in the program, (2) evaluate program performance, and (3) as models of effective safety and health management.

VPP Corporate

OSHA Regional and National Office personnel use the initial VPP Corporate application to: (1) conduct a preliminary analysis of the applicant's safety and health management programs, and (2) make a preliminary determination regarding the applicant's qualifications for participation. If the corporation is approved for participation federal personnel use the application and subsequent annual evaluations to justify continued participation in the program and evaluate program performance.

OSHA Challenge

OSHA National Office personnel use the initial Challenge Administrator's application to: (1) conduct a preliminary analysis of the applicant's knowledge of safety and health management programs; and (2) make a determination regarding the applicant's qualifications to become a Challenge Administrator. Once a Challenge Administrator is approved, the program's Administrator will review each Challenge candidate's application/annual submissions to ensure that all necessary information is provided, prior to forwarding them to OSHA's National Office for analysis and acceptance.

SGE Program

OSHA National Office personnel use the information submitted by the SGE applicants to ensure that individuals are qualified to serve, arrange for participation at VPP on-site evaluations, and inform participants of their status in the program. Specifically, the resume is used to ensure that the SGE applicant meets specific conditions and requirements, and the Confidential Financial Disclosure Report (OGE Form 450) is used to ensure that SGEs do not participate on on-site evaluations at worksites where there might be a conflict of interest.

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

OSHA welcomes the electronic submission of VPP documents, where such technology is available. However, some VPP documents require signatures, and must be submitted in hard copy until electronic signature (e-signature) is made available throughout the Department and/or Agency systems.

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 A.2 above.

The VPP application and annual self-evaluation is applicant/participant specific, and are not requested or collected by OSHA in any other circumstances. In instances where OSHA

regulations require employers to maintain written programs, this information may be used to satisfy VPP application requirements. The SGE application is applicant-specific, and is not requested or collected by OSHA under any other circumstances.

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

Small businesses (i.e., 250 or fewer workers on-site and 500 or fewer workers corporate-wide) account for approximately 4.3% of current VPP participants. Despite the fact that small businesses comprise a relatively small proportion of VPP participants, OSHA is concerned with minimizing their paperwork burden. To that end, OSHA only requires that applicants demonstrate the presence of comprehensive safety and health management programs which is commensurate with their occupational hazardous exposures. Because small businesses typically have a smaller spectrum of hazardous exposures and fewer levels of management, the amount of documentation required to demonstrate the comprehensive safety and health management programs is less than for larger companies. This translates into a smaller paperwork burden for small businesses.

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.

Not allowing OSHA to collect the information required in VPP applications, and annual evaluations for these programs would eliminate the Agency's ability to accept new participants into the VPP or re-certify current VPP participants for continued participation. This action would deprive VPP participants of the benefits associated with program participation. Forcing OSHA to collect the information less frequently would limit the Agency's ability to ensure that participants' sites are maintaining superior safety and health management programs.

Similarly, not allowing OSHA to collect SGEs application information would eliminate the agency's ability to accept new individuals into the program, or to reapprove current SGE participants for a new term of service. Requiring OSHA to collect SGE application information less frequently would limit the Agency's ability to maintain current and accurate information on SGEs, and result in a less effective program. Because SGEs are critical for maintaining VPPs success, a less effective program would deprive OSHA of valuable resources and services provided by the SGEs, limit VPP growth, deny potential and current VPP participants their valuable expertise, and deny individuals the prestige associated with being a SGE.

Not allowing OSHA to collect information required for OSHA Challenge would hinder the agency's ability to work with employers committed to improving their safety and health management programs. Requiring OSHA to collect Challenge Administrator's Applications and bi-annual reports for participants (which includes injury and illness data) would limit OSHA's ability to measure the success and/or needed improvements of participants within the Challenge Program.

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 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.**

No special circumstances exist that require employers to collect information in the manner or using the procedures specified by this item. The information collection requirements are consistent with the guidelines provided 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 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.

Pursuant to the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)) , OSHA published a notice in the **Federal Register** on March 22, 2011 (76 FR 16000) soliciting comments on its proposal to extend the Office of Management and Budget 's approval of the information collection requirements specified by the Voluntary Protection Program Information (VPP). This notice was part of a preclearance consultation program that provided the general public and government agencies with an opportunity to comment. Five commenters responded to the Agency's notice.

The first comment was submitted by Mr. Reggie Burke of the Monsanto Company

Mr. Burke's Comment: "I would like to see an on-line submittal process for the annual self-evaluation process. . . ."

Similarly, the second comment was submitted by Mr. Michael J. Vigezzi from the General Electric Company

"In summary, GE supports the information collection requirements of OSHA's VPP process and feels that it is a minimum requirement for the agency to properly perform its function." Mr. Vigezzi also commented that "... it has been our experience that it is not overly time-consuming to collect the information requested. . . ." However, he suggested "that the application process could be improved by allowing the submission of an electronic application through various digital means. This would be more environmentally friendly and could lessen the time burden."

OSHA's Response to both Commenters: OSHA is developing the OSHA Information System (OIS) that will replace the current Integrated Management Information System. OIS will also, for the first time, consolidate OSHA's various databases, including the VPP Automated Database System, into one comprehensive information system. Once fully launched, OIS will enable non-OSHA authorized users (e.g., VPP applicants/participants) to submit electronically the necessary applicant/participant worksite documents/information relating to their VPP application, PSM supplements, and annual self-evaluations.

The third comment was submitted by Raymond Aguilar of the United States Marine Corps (USMC). Marine Corps Logistics Base (MCLB), Barstow

Comment 1: Yes, information collected is useful, but it asks for way too much detail. The report should be a summary of what the organization did for the year, deficiencies, and how they are being addressed.

OSHA's Response to Comment 1: The information collected from VPP participants is required to ensure that each participant sustains or exceeds the requirements for continued VPP participation. The annual self-evaluation report is a summary of the worksite's implementation of the safety and health management system (SHMS) and includes information on how the worksite addressed issues identified the previous year, what needs to be improved, and how the worksite will address these issues during the coming year. This information and level of detail

provides OSHA with an overview of how well the participant is maintaining the VPP requirements. The report also helps the worksite further strengthen the SHMS and strive for continuous improvement.

Comment 2: “The report is extremely time consuming taking MCLB approximately 160 hours annually. These hours could be better utilized in hazard identification and abatement.”

OSHA’s Response to Comment 2: While the Agency recognizes that the annual self-evaluation report requires a considerable amount of time to complete, the time needed varies by worksite. OSHA believes that the hours provided appropriately reflect the time required to complete the annual self-evaluation report.

Comment 3: “Yes, automating would help. I would also recommend exempting Federal organizations that are VPP sites from having to submit the annual OSHA report which is redundant and even more time consuming.”

OSHA’s Response to Comment 3: Again, OSHA is developing the OSHA Information System (OIS) that will replace the current Integrated Management Information System. OIS will also, for the first time, consolidate OSHA’s various databases, including the VPP Automated Database System, into one comprehensive information system. Once fully launched, OIS will enable non-OSHA authorized users (e.g., VPP applicants/participants) to submit electronically the necessary applicant/participant worksite documents/information relating to their VPP application, PSM supplements, and annual self-evaluations.

Regarding exempting Federal organizations that are VPP sites from having to submit the annual OSHA report, 29 CFR 1960 requires Federal agencies to complete the OSHA Report annually. This requirement and report are outside of VPP’s purview.

The fourth comment was submitted by Mr. Norman R. Deitch of EHS Excellence Consulting

: “The VPP application and annual self-evaluation documents are especially critical for maintaining the validity of the OSHA VPP and assuring its integrity and consistency. . . .”

OSHA’s Response to Comment 1: The Agency concurs with Mr. Deitch’s comment and thankful to him and his employees for their commitment, hard work, and dedication to the VPP.

Comment 2: “We think the hours estimated completing the VPP application and annual self-evaluation are underestimated. . . .”

OSHA Response to Comment 2: While the Agency recognizes that the VPP application and annual self-evaluation report require a considerable amount of time to complete, the time needed varies by worksite. OSHA believes that the hours provided appropriately reflect the time required to complete the VPP application and the annual self-evaluation report.

Comment 3: “We think the forms are clear in what they are asking for.”

OSHA Response to Comment 3: The Agency concurs with Mr. Deitch’s comment and wishes to thank him and his employees for their commitment, hard work, and dedication to the VPP.

The fifth comment was submitted by Eric S. Barnes, CIH, CSP, CHMM, Health and Safety Program Manager of International Paper

Comment 1: “. . . International Paper supports the information collection requirements as necessary to properly evaluate a site’s status, activities, and performance with regard to initial selection and ongoing participation in VPP.”

OSHA Response to Comment 1: The Agency concurs with the comments from International Paper and thanks them for their commitment, hard work, and dedication to the VPP.

Comment 2: International Paper cites that participation in VPP reveals the estimates of the time required to complete the VPP and PSM initial applications and the VPP and PSM annual self-evaluations may be underestimated.

OSHA Response to Comment 2: While the Agency recognizes that the VPP application, the annual self-evaluation report, and the PSM supplements require a considerable amount of time to complete, the time needed varies by worksite. OSHA believes that the hours provided appropriately reflect the time required to complete VPP application, the annual self-evaluation report, and the PSM supplements.

Comment 3: “One concern regarding the utility of the information collected is that the questions seem to generate repetitive answers. . . .”

OSHA’s Response to Comment 3: The Agency believes the information collection requirements to apply for participation in VPP are appropriate and necessary to evaluate whether a worksite meets the high standards required for inclusion in the VPP. The responses submitted describe the methodology the worksite has developed, implemented, and sustained to meet the VPP requirements. This information not only describes the implementation of the safety and health management system, including how the system addresses the VPP elements (management leadership and employee involvement, worksite analysis, hazard prevention and control, and safety and health training) but it also serves to document the gap analysis performed by the worksite to ensure that all program requirements are met.

Comment 4: “Most of the questions on the VPP forms require a lengthy, narrative response. Ideas to reduce the burden associated with completing and submitting these documents include:”

OSHA’s Response to Comment 4: The Agency appreciates the list of suggestions to improve submitting VPP documents and information to OSHA submitted by International Paper. The suggestions will be shared with the OSHA’s Directorate of Cooperative and State Programs

which oversees VPP forms and documents and is providing input into the VPP portion of the OSHA Information System (OIS).

OSHA is developing the OIS to replace the current Integrated Management Information System. OIS will also, for the first time, consolidate OSHA's various databases, including the VPP Automated Database System, into one comprehensive information system. Once fully launched, OIS will enable non-OSHA authorized users (e.g., VPP applicants/participants) to submit electronically the necessary applicant/participant worksite documents/information relating to their VPP application, PSM supplements, and annual self-evaluations.

The Agency appreciates the time and effort made by the above commenters; however, OSHA did not receive sufficient information to revise the proposed burden hours and costs. Thus, the Agency is retaining its proposed burden hours.

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

Respondents are assured of the confidentiality of their VPP application until it is approved. Confidentiality requirements are outlined in the VPP FRN, the VPP Policies and Procedures Manual, and the SGE Policies and Procedures Manual.

Participants applying for the VPP understand that, if approved to participate into these programs, their application becomes part of the public record. SGEs understand that, if approved to the program, they will be considered active SGEs and may be requested to participate on VPP on-site evaluations. 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.
- Provide estimates of annualized cost to respondents for the hour burdens for collection of information, identifying and using appropriate wage rate categories.

The information collection estimates contained in the table below are based on programmatic expertise and experience of Federal personnel, consultation with a small (fewer than 10) sample of VPP participants, a high cost estimate of \$25.00 per hour for private sector personnel, and best professional judgment.

Annual Effect of VPP Information Collection On the Private Sector

Information Collection	Estimated Number of Responses (3-year average)	Frequency of Response	Estimated Annual Burden Hours per Respondent	Estimated Annual Burden Hours	Preparation Cost per Document	Estimated Annualized Costs
VPP						
<u>VPP Application Types</u> Site Based Mobile Workforce Corporate (See footnote*1)	300	1 time	200 hours	60,000 hours	\$5,000	\$1,500,000
VPP Application Supplemental /PSM Questionnaire - A	75 (25 %) of VPP Applications	1 time	40 hours	3,000 hours	\$1,000	\$75,000
VPP Annual Self-Evaluation	1,700	1 per year	20 hours	34,000 hours	\$500	\$850,000
PSM Evaluation/Supplemental Questionnaire - B	425 (25 %) of VPP Annual Self-Evaluation	1 per year	20 hours	8,500 hours	\$500	\$212,500
OSHA Challenge Pilot Program						
Challenge Administrators Application	14	1 time	5 hours	70 hours	\$125	\$1,750

Information Collection	Estimated Number of Responses (3-year average)	Frequency of Response	Estimated Annual Burden Hours per Respondent	Estimated Annual Burden Hours	Preparation Cost per Document	Estimated Annualized Costs
Challenge Pilot Candidate Application	210	1 time	10 hours	2,100 hours	\$250	\$52,500
Quarterly Reports	210	3 times per year	5 hours	3,150 hours	\$125	\$78,750
Annual Evaluation	210	1 time per year	20 hours	4,200 hours	\$500	\$105,000
Special Government Employee						
SGE Eligibility	900	1 every 3 years	8 minutes (.13 hour)	39 hours	\$3.36	\$3,024
Resume	900	1 every 3 years	30 minutes (.5 hour)	150 hours	\$12.50	\$11,250
Confidential Financial Disclosure Form (OGE Form 450) See footnote*2	300	Annually	30 minutes (.5 hour)	150 hours	\$12.50	\$3,750
Total	5,244			115,359		\$2,893,524

Footnote*1. Approximately 25% of existing VPP sites and new applicants fall under OSHA's PSM Standards. In addition these sites must complete information requiring PSM within the VPP applications and for the Annual Evaluation/PSM Supplemental Questionnaire.

Footnote*2. The paperwork burden associated with the Confidential Financial Disclosure document is not included in this ICR Burden hours for this document. This document is accounted for under OMB Control Number 32090-0006 (OGE-450).

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 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 a 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 these collections of information requirements.

14. Provide estimates of annualized costs 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 information collection estimates contained in the table below are based on programmatic expertise and experience of federal personnel, an average cost estimate of \$50.00 per hour of government personnel time (GS-13, Step 6), and best professional judgment.

**Effects of VPP Information Collection
On the Federal Government**

Information Collection	Estimated Number of Responses (3-year average)	Frequency of Response	Federal Government Review Time per Document	Total Annual Review Time per Document	Federal Government Review Costs
VPP					
VPP Application (See footnote *1 on page 10)	300	1 time	5 hours - GS-13	1,500 hours	\$75,000
VPP Application Supplemental /PSM Questionnaire - A	75 (25% of VPP Applications)	1 time	4 hours - GS-13	252 hours	\$15,000

Information Collection	Estimated Number of Responses (3-year average)	Frequency of Response	Federal Government Review Time per Document	Total Annual Review Time per Document	Federal Government Review Costs
VPP Annual Evaluation	1,700	1 per year	2 hours - GS-13	3,400 hours	\$170,000
PSM Evaluation/Supplemental Questionnaire – B	425 (25%) of VPP Annual Evaluation	1 per year	2 hours - GS-13	850 hours	\$42,500
OSHA Challenge Pilot Program					
Challenge Administrators Application	14	1 time	5 hours - GS-13	70 hours	\$3,500
Challenge Pilot Candidate Application	210	1 time	5 hours - GS-13	1,050 hours	\$52,500
Quarterly Reports	210	3 times	2 hours - GS-13	1,260 hours	\$63,000
Annual Evaluations	210	1 time	2 hours - GS-13	420 hours	\$21,000
Special Government Employee					
General Eligibility Information Sheet	900	1 every 3 years	10 minutes (.17 hour) GS-13	51 hours	\$2,550
Resume	900	1 every 3 years	10 minutes (.17 hour) GS-13	51 hours	\$2,550
Confidential Financial Disclosure Form (OGE-Form 450) (See footnote *2 on page 10)	300	Annually	10 minutes (.17 hour) GS-13	51 hours	\$2,550
Total	5,244			8,955	\$450,150

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

OSHA is requesting an adjustment increase of 9,394 burden hours over the last approval of 105,965 hours resulting in an annual paperwork burden allotment of 115,359 burden hours. This adjustment is justified by VPP revision of its traditional focus on individual fixed worksites by adding two new ways to participate: mobile workforce and corporate. OSHA Challenge continues to be a pilot program.

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 the information, completion of report, publication dates, and other actions.

There are no plans to publish this information.

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

OSHA is not seeking approval not to display the expiration date.

18. Explain each exception to the certification statement.

OSHA is not seeking such an exception.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This Supporting Statement does not contain any collection of information requirements that employ statistical methods.