

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSIONS**

**Title 29 CFR Part 29
Apprenticeship Programs - Labor Standards for Registration
OMB Control Number 1205-0223**

A. JUSTIFICATION

1. Reasons for Data Collection

The National Apprenticeship Act of 1937, Section 50 (29 U.S.C. 50), authorizes and directs the Secretary of Labor "to formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices, to extend the application of such standards by encouraging the inclusion thereof in contracts of apprenticeship, to bring together employers and labor for the formulation of programs of apprenticeship, to cooperate with State agencies engaged in the formulation and promotion of standards of apprenticeship, and to cooperate with the Secretary of Education in accordance with Section 17 of Title 20." Section 50a of the Act authorizes the Secretary of Labor to "publish information relating to existing and proposed labor standards of apprenticeship," and to "appoint national advisory committees..." (29 U.S.C. 50a).

The purpose of Title 29 Code of Federal Regulations (CFR) Part 29 is to set forth labor standards to safeguard the welfare of apprentices, and to extend the application of such standards by prescribing policies and procedures concerning registration, for certain Federal purposes, of acceptable apprenticeship programs with the U.S. Department of Labor (DOL), Employment and Training Administration (ETA), Office of Apprenticeship, (OA). These labor standards, policies, and procedures cover the registration and cancellation of apprenticeship programs and of apprenticeship agreements; and the recognition of a State agency as the appropriate agency for registering local apprenticeship programs for certain Federal purposes; and related matters.

On October 29, 2008, ETA issued in the Federal Register a final rule that updated Title 29, CFR Part 29. The

regulations were revised for the first time since 1977. The rule became effective on December 29, 2008 and implemented changes to Title 29 CFR Part 29 that will increase flexibility, enhance program quality and accountability, and promote apprenticeship opportunity in the 21st century, while continuing to safeguard the welfare of apprentices.

Description of the collection instrument

- ETA Form Number: 671
- OMB Control Number: 1205-0223

This collection instrument has two sections, one for program sponsor's information (Section I) and one for apprentice's information (Section II). These two separate sections are used at different times, and for different purposes. The information is not duplicative. Twelve fields are repopulated electronically from Program Registration - Section I, through the Registered Apprenticeship Partners Information Data System (RAPIDS) to Section II, Part B. The information is collected on a one-time basis.

The Apprenticeship and Training Representative (ATR) is available upon request to provide full technical assistance and services to those sponsors and apprentices who do not have computer technology available and use the paper version of ETA 671.

The primary headings in the Program Registration - Section I, (OMB Control No. 1205-0223), are as follows: Program Sponsor Information, Program Sponsor's Related Contact Information, Journeyworkers Employed, Related Technical Instruction (RTI) Information, RTI Source Information, Program Sponsor Signature, ATR Information, Program Registration Information, and ATR Signature.

The information requested under most of these headings is routine information such as identification of the entities, their addresses, telephone numbers, e-mail addresses, fax numbers, and web-site addresses. Non-routine exceptions where additional information is requested are under Program Sponsor Information, Journeyworkers Employed, Related Technical Instruction Information (RTI), Program Sponsor Signature, Program Registration Information, and ATR Signature. Definitions and Instructions, pages 3-5, are

also included. The information is collected on an occasional basis, but not more than once a year.

In the proposed new version of Section I, the following items would be deleted:

- Item 55. - North American Industrial Classification System (NAICS) (redundant)
- Item 60. and 60a. - Number of Hours - this has been determined to be duplicative. See Item D6 in proposed Section I.

Program Registration - Section I

To account for the various proposed modifications, particularly in the area of program design, the estimated average response time will increase for Program Registration, Section I, from 10 minutes to 12 minutes per response.

In the proposed Section I the modifications include:

Item D1. Delivery Technique (Item 21. in the currently approved Section I) was changed to Occupation Training Approach; the related instructions, p. 3, now include the hybrid approach, an additional occupational approach to the time-based and competency-based approaches.

Interim Credentials: the program sponsor voluntarily chooses to utilize interim credentials. They are applicable only to competency-based or hybrid occupations. The program sponsor marks either the "Yes" or "No" box in the CB or HY Interim Credentials section.

Related Technical Instruction (RTI) Information (E1. - 16): This section is modified to capture contact information on the RTI providers.

Instruction Method (Item E3.): Program Definitions and/or Instructions, p. 3 - now includes electronic media (technology -based instruction and distance learning.

Probation Length in Hours (Item H26.): The instructions, p. 4, provide examples and information related to the maximum term of the probation.

Number of Periods (H31.f): Instructions, p.4, indicate how and where this information can be located if necessary.

Provisional Registration Date (Item H33.): Provisional registration is a one-year initial provisional approval for a new program that meets the required standards for program registration.

Apprentice Registration – Section II

Career Linkage or Direct Entry (Item A7.): Check boxes labeled incumbent worker, adult, youth, and dislocated worker were consolidated into one check box called “One-Stop referral,” and the related instructions were modified accordingly.

As indicated above, to ensure consistency, clarity, and alignment with Title 29 CFR Part 29, effective December 29, 2008, the modifications to section II include:

Occupation Code (Item Part B2b.1. Interim Credentials: the program sponsor voluntarily chooses to utilize interim credentials. Based on program standards that utilize the competency-based or hybrid training approach, and upon request of the program sponsor, the credentials are issued as certificates by the Registration Agency. Interim credentials provide certification of competency attainment by an apprentice. The program sponsor marks either the “Yes” or “No” box in Part B. Item 2b.1.

Occupation Training Approach (Item Part B3.): The program sponsor decides which of the three training approaches to use as follows:

- a. Time-Based Training Approach {apprentice required to complete a specific number of hours of on-the-job learning (OJL) and related training instruction (RTI)};
- b. Competency-Based Training Approach (apprentice required to demonstrate competency in defined subject areas and does not require any specific hours of OJL or RTI); or
- c. Hybrid Training Approach (apprentice required to complete a minimum number of OJL and RTI hours and

demonstrate competency in the defined subject areas).

The Program Definitions and/or Instructions section has also been modified (p. 2), as follows:

Interim Credentials (Part B. Item 2b.1.), Occupation Training Approach (Part B. Item 3.), Term (Part B. Item 4), Probationary Period (Part B. Item 5), Term Remaining (Part B. Item 7), Wage Instructions/Term (Part B Item 10d.).

Regulation: Title 29 CFR Part 29, and 30:

The following sections of the regulation contain information collection requirements subject to the Paperwork Reduction Act:

- Section 29.3 (a) of Section 29.3 (a)-(k) is the overarching or dominant element of this Section. It is important because a program is eligible for various Federal purposes only if it is in conformity with apprenticeship program standards published by the Secretary of Labor and if the program is registered with the Office of Apprenticeship (OA), or a recognized State Apprenticeship Agency (SAA).
- Section 29.3 (b) provides for the registration of the program and apprentice. Program registration not only assures industry consistency relative to the skills sets of the apprenticeable occupation and the related technical instruction, it also protects the welfare of the apprentices because of this consistency and uniformity.
- Section 29.3 (b) is necessary to safeguard the welfare of apprentices to ensure that the program is providing equal employment opportunities. If the information under 29.3 (b) were not collected, there would be no formal agreement or registration between the sponsor and the Office of Apprenticeship or the State Apprenticeship Agency and there would, therefore, not be a formal apprenticeship program.
- Section 29.3 (c) (1) provides for the registration of apprentices to assure the individuals receive the

proper agreed upon skilled training and to make possible the granting of recognition to the individuals for the training received.

- Section 29.3 (c) (2) allows for the filing of a list of apprentices rather than individual agreements.
- Section 29.3 (d) is necessary where a list is used to permit certification that a specific employee is eligible for probationary employment.
- Section 29.3 (e) is necessary to safeguard the welfare of apprentices to ensure that they have not been terminated unjustly, to acknowledge transfers or shifts of apprentice registration, to provide a check for the quality of the program, and to appropriately recognize those that complete the training program.
- Section 29.3 (g) and (h) provides for the provisional approval, permanent registration, and subsequent reviews of programs to ensure conformity to the regulations. It also protects the welfare of the apprentices by ensuring the quality of the programs.
- Section 29.3 (i) also is necessary to ensure that program modifications do not adversely affect apprentices from receiving proper training in accordance with agreed upon standards and to ensure that programs include up-to-date technological changes so that apprentices will receive training current for their occupation.
- Section 29.3 (j) is important because the Act calls for bringing together employers and labor for the formulation of programs of apprenticeship, and it is necessary to ascertain that all appropriate parties are properly involved in the training. This requirement also serves to protect the welfare of the apprentice by ensuring proper representation of employees in training matters.
- Section 29.3 (k) is necessary to ensure that programs proposed by an employer or groups of employers have the same opportunity for program registration as those proposed programs with collective bargaining agents.

It is necessary to ascertain that all employers are properly involved in the training. It also safeguards the welfare of the apprentice by increasing the choices of program selection by an apprentice.

29.7 Apprenticeship Agreement.

Section 29.7 provides for specific information necessary to protect the welfare of apprentices and ensure proper wages and training (on-the-job and related instruction), various work processes are provided, proper probationary periods are permitted, and equal employment opportunity is ensured.

29.5 Standards of Apprenticeship

This section describes those standards appropriate and necessary to ensure that apprentices receive the proper training for their skilled apprenticeable occupations. The attached copy of the regulation, Title 29 CFR Part 29, (Attachment 2) includes a listing of those standards, and program sponsors must be fully aware of and agree to meet these standards.

29.13 Recognition of State apprenticeship agencies. (a) (1)-(5); (b) (1)-(9); (c); (d); (e)(1)-(4).

The National Apprenticeship Act calls for cooperation with State Apprenticeship Agencies (SAAs) engaged in formulation and development of standards of apprenticeship. Section 29.13 deals with the recognition of the State agency by the Secretary of Labor for Federal purposes and as such certain information needs to be submitted to and approved by the Office of Apprenticeship for continued recognition. This section also contains provisions for appeal from denial of recognition, SSAs request for withdrawal from recognition, OA's retention of authority, and program registration with OA.

29.14 Derecognition of State agencies.

Section 29.14(g), requiring the notification of all apprentices that recognition for Federal purposes has been withdrawn, serves to safeguard and protect their welfare.

2. Purpose of Information Collection

The information to be collected on the "Program Registration - Section I" and Apprentice Registration - Section II" (Attachment 3) is as follows:

For program registration, the secretary of the sponsor enters the information on the first two pages.

The third, fourth and fifth pages consist of definitions and/or instructions to assist the sponsor in completing the instrument. The ATR reviews this information for compliance and for changes to the information previously collected, e.g., active or inactive program, addition or deletion of a school-to-registered apprenticeship sponsor, related technical instruction provider (Attachment 3). This information needs to be collected to ensure that the program is in conformity with Title 29 CFR Part 29.1(b) so that it can continue to be registered and the welfare of the apprentice is maintained.

To register the apprentice, the secretary of the program sponsor enters the information for Part A on Section II. For Part B, twelve fields are repopulated electronically from Program Registration - Section I, through RAPIDS, which includes definitions and instructions on those data elements that are not self-explanatory. Other additions and modifications have been incorporated in the proposed form to align it with the Final Rule of Title 29 CFR Part 29.

The ATR periodically reviews the information to ensure that the apprentice is receiving the appropriate training and to document all aspects of training that have been agreed upon by the individual apprentice and the sponsor. If this information was not collected, there would be no formal agreement or registration between the sponsor and the apprentice and, therefore, no formal apprenticeship program.

The ATR is available upon request to provide full technical assistance and services to those program sponsors and apprentices who do not have computer technology available.

Summary information is used to respond to requests from senior management, Congress, public interest groups, the apprenticeship sponsor community, and the general public.

Apprenticeship standards (29.5) are required by Title 29 CFR 29.5 for sponsors to have a registered apprenticeship program. These standards include the program delivery approach, an on-the-job training outline, related instruction curriculum, and the apprenticeship operating procedures. Standards are incorporated by reference in the Apprentice Registration -Section II, top right column, because the standards outline all the conditions for the recruitment, selection, employment, and training of apprentices to which all parties to the Apprenticeship Agreement are agreeing.

A formal registered apprenticeship program could not exist without the standards of apprenticeship. The ATR will be available upon request to provide full technical assistance and services to those program sponsors who do not have computer technology available.

29.13 Recognition of State agencies.

The National Apprenticeship Act calls for cooperation with State Apprenticeship Agencies (SAAs) engaged in formulation and development of standards of apprenticeship. Section 29.13 deals with the recognition of the State agency by the U.S. Department of Labor for Federal purposes and as such certain information needs to be submitted and reviewed to determine that the policy and procedures of the state conform to the minimum standards established by the regulations. This section also contains provisions for appeal from denial of recognition, SSAs request for withdrawal from recognition, OA's retention of authority, and program registration with OA. The submitted information is also reviewed and analyzed to determine whether the agency should be recognized to act as agent for the Secretary and approved by the Office of Apprenticeship for continued recognition.

29.14 Derecognition of State agencies.

Section 29.14(g), requiring the notification of all apprentices that recognition for Federal purposes has been withdrawn, serves to safeguard and protect their welfare. Such notification is important so that the apprentices fully understand that all the benefits to them of such Federal recognition will no longer exist, and they may take

appropriate action to protect their interest. Also, not having such a requirement would be detrimental to the best interest of the apprentices and would not serve to protect their welfare as legislatively mandated.

3. Technology and Obstacles Affecting Reporting Burden

ETA has implemented an electronic apprentice registration process consistent with the Government Paperwork Elimination Act and E-Government requirements. ETA also implemented an electronic program registration process through its re-engineered, RAPIDS. These are additional tools to assist sponsors and apprentices in the registration processes and improve data reporting capabilities.

As of Fiscal Year 2010, more than 80 percent of all apprentices were registered through the AER process. With the re-engineering of RAPIDS, the electronic registration of apprentices and the electronic registration of programs, OA is implementing the Government Accountability's Office recommendation to improve and focus its program data to target resources that will address and remedy areas in need of assistance.

National Guideline Standards and National Standards have been developed and new ones are continually being developed to provide for local adaptation merely by copying and/or modifying to the extent appropriate the standards which are now available electronically.

4. Duplication

Recordkeeping and reporting requirements under Title 29 CFR Part 29 are not duplicated elsewhere.

5. Burden on Small Business or Other Small Entities

The information collected under Title 29 CFR Part 29 does not have a significant impact on small businesses.

6. Consequences of Failure to Collect Data

The registration of apprenticeship programs and apprentices is necessary to carry out the requirements of the National Apprenticeship Act. Program registration information is

reviewed periodically but not more than once on a yearly basis. Apprentice information is only submitted on a one-time basis and therefore, the collection frequency in this section cannot be further reduced.

7. Special Circumstances Involved in Collection of Data Validation Information

The information is collected in a manner consistent with paperwork requirements. Data collection and retention is consistent with 5 CFR 1320.5. However, a records retention requirement of five years is necessary. The duration of many apprenticeship programs is four years or more, and it is important to keep the records for a period of time after an apprentice has exited the program.

8. Pre-Clearance Notice and Responses

In accordance with the Paperwork Reduction Act of 1995, a Pre-clearance Notice for the sixty days' public comment was published in the Federal Register on September 29, 2011 (Vol. 76, page 60534, et. seq.).

On OA'S Website, <http://www.doleta.gov/oa/>, at four different web pages - Welcome Page, Policy (Policy, Regulations & Legislation, What's New, and Regulations) - the public was informed about the 60-day public comment period on the proposed revisions to the Employment and Training Administration (ETA) Form 671, Sections I (Program Registration) and Section II (Apprentice Registration in accordance with the Paperwork Reduction Act (PRA) of 1995. A copy of the proposed collection of information was also available. Comments on or before November 28, 2011 could be e-mail to oa.administrator@dol.gov

Only one respondent from New Jersey submitted comments via e-mail, as follows:

"II (Apprentice Registration) Form
Part C

Their appears to be no clear change of command "as per signatures" for states that have state apprenticeship committees and or county apprenticeship coordinators. I believe the apprentice deserves to know who and when received their registration forms many Apprentice

Coordinators have been given access to rapids and still have to use hard copy forms."

OA's response to this comment is as follows:

In New Jersey, the State Department of Labor and Workforce Development (LWD) provides funding to each of the 21 counties to support a County Apprenticeship Coordinator (CAC). The CAC responsibilities include promotion of registered apprenticeship (RA) and contact with potential RA Sponsors to develop RA Programs and obtain data to be entered into the federal apprenticeship database, Registered Apprenticeship Partners Information Data System (RAPIDS). As has been past practice in New Jersey for the last 30 years, the CAC signs the Apprenticeship Agreement (AA) and forwards it to a USDOL Apprenticeship and Training Representative (ATR) who then ensures that all criteria are met and registers the program and/or apprentice. Once the AA is fully executed, a copy is sent to LWD, the DCAC, and the sponsor who, in turn, provides the Apprentice with a copy.

When a CAC is given permission by a sponsor to enter information into RAPIDS, the CAC can access information regarding the specific RA program. Level of access to RAPIDS by a CAC is intentionally limited. However, for small programs initiated with the assistance of the CAC, a printout of Form 671 is used.

The "change of command" term referenced by the individual submitting the comment is a reference to the processing of a worksheet (printout of Form 671, Section II) used by a CAC. In New Jersey, as a system of checks and balances, required on the AA are signatures by the Apprentice, the Sponsor, the CAC, LWD, the ATR, and the USDOL-New Jersey State Director. Once all signatures are affixed, copies are distributed.

Nationwide this is the standard process for all Office of Apprenticeship apprentice registration. To ensure compliance with the requirements of CFR 29.6., Program Performance Standards, the Office of Apprenticeship conducts a quality assurance reviews on all RA programs as part of our Federal oversight responsibility.

ETA has been in contact with sponsors/employers and other interested groups on a regular basis and to date no adverse

comments have been received regarding this reporting requirement.

9. Payments to Respondents

This information collection does not involve direct payments to respondents. The Office of Apprenticeship does not provide funding to State Apprenticeship Agencies, program sponsors, or program participants.

10. Confidentiality

The Privacy Act Statement is provided, since voluntary (optional) disclosure of the social security number (SSN) is requested. The SSN is requested to facilitate securing accurate, consistent and uniform retention and wage data from Unemployment Insurance Wage Records via the Wage Record Interchange System (WRIS). This information is used to determine OA's program performance outcomes of retention and wage gains related to the common measure of Federal job training and employment programs of ETA and according to OMB. Also included is a statement that informs the apprentice where the information he/she has provided on the collection instrument is stored, name of the system and location of the system, and that the information is protected in accordance with the Privacy Act. No protected information is requested in the other sections.

11. Questions of a Sensitive Nature

No information is collected that is considered to be of a sensitive nature.

12. Respondent Annual Burden

29.3 and 29.7

Latest available data (FY 2010 RAPIDS database) indicates there are more than 26,000 registered apprenticeship programs. Based on recent fiscal yearly data, it is estimated that 1,000 new programs were registered by Federal staff and that the average response time for new program registrations will increase from 10 minutes to 12 minutes due to the final rule on Title 29 CFR Part 29 which became effective on December 29, 2008. The total burden hours will

be 200 burden hours (1,000 x .20). It is necessary to collect and capture uniform and consistent data associated with all new program registrations. In addition, the information is useful to determine trends in program development. Information on Program Registration - Section I is reviewed periodically but not more than once on a yearly basis. The respondent cost is \$3,400 (200 hours x \$17*).

* The \$17 mean hourly rate [rounded to the nearest dollar] for the program sponsor's secretary was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Earnings in the United States, 2009, Bulletin 2738, June 2010, Secretaries,..., Table 4 p. 4-21, December 2008-January 2010.

Experience has shown that each one of these sponsors responds at least once a year with information on new apprentices, completions, or terminations. It is estimated based upon the most recent data from FY 2010 RAPIDS that system-wide about 87,600 new apprentices were registered and that there were about 82,400 completions and terminations. In calculating the estimates, OA will use Federal workload data obtained from the RAPIDS 2010 Report. Estimated new apprentice registrations were 67,240 and apprentice completions and cancellations were 69,400. The average response time will remain as last approved at five minutes for new apprentice registrations, completions, and cancellations as follows: 5,581 hours (67,240 x .083), and 5,760 hours (69,400 x .083), respectively.

The respondent cost is \$94,877 (5,581 hrs. x \$17*) and \$97,920 (5,760 hrs. x \$17) for a total of \$192,797 (\$94,877 + \$97,920).

* The \$17 mean hourly rate [rounded to the nearest dollar] for the program sponsor's secretary was obtained from the U.S. DOL/BLS National Compensation Survey as mentioned above.

29.5

Based upon latest available data, more than 1,800 respondents per year make an annual response system-wide (Standards [plan]). Of this total, approximately, 1,000

programs were registered by Federal staff. Experience shows that this activity takes two hours per sponsor (1,000 x 2 hrs. = 2,000 hours). The respondent cost is \$58,000 (2,000 hrs. x \$29*).

* The \$29 mean hourly rate [rounded to the nearest dollar] for the program sponsor was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Earnings in the United States, 2009, Bulletin 2738, June 2010, Human resources, training and labor relations specialists, Table 4, p. 4-2, December 2008-January 2010.

Title 29 CFR Part 29, Apprenticeship Programs, Labor Standards for Registration, Amendment of Regulations: Final Rule, October 29, 2008, effective December 29, 2008, established that the relationship between the Federal government must be between two government entities, i.e., Department of Labor and the cabinet-level government agency in each State's government that operates and manages the functions of registered apprenticeship in that State, i.e. state apprenticeship agencies (SAAs). The final rule also defines the following as states: any of the 50 states of the United States, the District of Columbia, or any territory (Puerto Rico and the Virgin Islands) or possession of the United States.

The SAAs have been delegated the responsibility by the Secretary of Labor to review/update the standards; thus, performing similar functions as the GS-12 Federal Representatives (ATRs) of OA. Experience indicates this takes two hours per sponsor at the cost of \$23 per hour (State employee). The annualized cost to the registration agency is \$36,800 (800 x 2 hrs. = 1,600 hrs. x \$23*).

* The \$23 mean hourly rate [rounded to the nearest dollar] for the SAA Apprenticeship Training Representative was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Earnings in the United States, June 2009, Bulletin 2738, June 2010, Human Resources, training and labor relations specialists, Table 6, p. 6-1, December 2008-January 2010.

29.13

Revised 29 CFR part 29 (Labor Standards for Registration of Apprenticeship Programs) requires that, by December 29, 2010, (two years after the effective date of the rule), State Apprenticeship Agencies (SAAs) seeking new or continued recognition to act as a Registration Agency must submit applications for recognition as a State Registration Agency for Federal purposes. ETA sent letters conferring continued recognition to 26 SAAs that either submitted a conforming application for recognition (13 SAAs) and those that requested a conforming extension for compliance (13 SAAs). To date, no state has been granted full recognition status under the revised final rule; however, OA has reviewed 19 applications and has referred its findings to SOL for further review. OA will complete the reviews for the other seven applications by the end of May 2011.

No new State agencies are expected during Fiscal Years 2012-2015. However, due to reduced state resources, other SAAs may decide to transfer their delegated responsibilities to OA.

On a yearly basis, the state's costs involved are for compiling and submitting information affecting their recognition status such as state apprenticeship law, copies of the state council composition, state plan for Equal Employment Opportunities in Apprenticeship, description of basic standards for program registration, and a description of policy and operating procedures. Essentially, this is merely compiling and mailing of the above-referred-to materials (25 SAAs plus the District of Columbia x 2 hours per response = 52 hours), and is a minimal cost. Such cost is estimated to be \$1,352 (25 SAAs plus the District of Columbia x 2 hours x \$26). Consideration in arriving at this annualized cost is limited to the submission of the information and assumes that the state, in its own desire to have an apprenticeship agency, has already taken all the necessary actions and prepared all the required documents for the conduct of their own apprenticeship program.

29.14 (g)

California and New Hampshire were derecognized as state agencies. Under this section, the states were required to notify registered apprentices of the withdrawal of recognition for Federal purposes in the event the states did

not become what is know as Federal registration states, which they became. Therefore, the apprentices remained covered under any Federal provision applicable to his/her individual registration under a program recognized or registered by the Secretary of Labor for Federal purposes.

The total burden is summarized in the following table.

Requirement ETA Form 671	Sec.	Total Respondents	Frequency	Annual Response	Average Response Time	Annual Burden Hours
"	29.7	67,240	1-time basis	67,240	.083 hr./ Apprentice	5,581 Hrs.
"	29.7	69,400	1-time basis	69,400	.083 hr./ Apprentice	5,760 Hrs.
"	29.5	1,026	1-time basis	1,026	2 hrs./ Sponsor	2,052 Hrs.
"		800	1-time basis	800	2 hrs./ SAA	1,600 Hrs.
"	29.13 (26 SAAs have sought recognition and are awaiting final recognition; no new state agency expected during 2012-2015)					
"	Totals	138,466				14,993

SUBTOTAL RESPONDENTS: 138,466

SUBTOTAL BURDEN Hours: 14,993

Burden estimates are experience-based.

Subtotal Respondent Cost \$292,349

ETA 671A (section II): ETA 671A (section II), a slight variation of ETA-671 (section II), is being used by a grant program, YouthBuild, affiliated with the Apprenticeship program.

It is estimated to take .16 hours to complete ETA 671A. Sponsors will fill out approximately 1500 ETA-671A forms on a one-time basis (annualized).

	Burden	Number of	Annual	Applicable	Annual
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Report	Per sponsor	forms filled out annually	National Burden Hours	Hourly Rate	National Dollars
ETA 671A, sec II	.16 hour	1500	240	\$10.75	\$2,580

TOTAL respondents: 1500 Youthbuild apprenticeship forms + 138,466 = 139,966 respondents.

It is estimated that a total of 1500 participants in YouthBuild grantee programs will use the ETA-671A (section II) apprenticeship form. Therefore the 1500 respondents in the YouthBuild program, filling out the ETA 671A registration form at .16 hours per form, amounts to a total of 240 burden hours annually. TOTAL burden hours: 240 for Youthbuild apprenticeship sponsor respondents plus 14,993 for other apprenticeship sponsor respondents = 15,233 hours.

13. Estimated Cost to Respondents

There are no additional costs other than those mentioned in Number 12 above.

14. Cost to Federal Government

29.3 and 29.7

The burden to the Federal Government based on the GS-12/1 salary of \$33 per hour (rounded to the nearest dollar from OPM General Schedule, for the Locality Pay Area of the Rest of U.S., effective January 2011) is primarily for reviewing the materials submitted by the sponsors, processing these including inputting data in the database and returning copies to sponsors and other partners, as appropriate.

For new apprenticeship program electronic registrations, the process is estimated to take 12 minutes. The annualized cost to the Federal Government for new program registrations is \$6,600 (1,000 x 12 minutes = 12,000; 12,000 divided by 60 minutes = 200 hrs.; 200 hrs. x \$33 = \$6,600). Estimated

annualized cost per program registration is \$6.60 (\$6,600 divided by 1,000).

For new apprenticeship agreements, the process is estimated to take five minutes. The annualized cost to the Federal Government for new apprentice registrations is \$184,899 (67,240 x 5 minutes = 336,200; 336,200 divided by 60 minutes = 5,603 hrs.; 5,603 hrs. x \$33 = \$184,899). Estimated annualized cost per apprentice is \$2.75 (\$184,899 divided by 67,240).

Also, it is estimated that it takes about five minutes to process approximately 69,400 terminations and completions per year. Total annualized cost to the Federal Government is \$190,839 (69,400 x 5 minutes = 347,000; 347,000 divided by 60 minutes = 5,783 hrs. (5,783 x \$33 = \$190,839). Estimated annualized cost per apprentice terminations and completions is \$2.75 (\$190,839 divided by 69,400).

Total annualized cost for all apprentice actions is (\$6,600 + \$184,899 + \$190,839) = \$382,338 -- Federal.

29.5

There are more than 950 occupations that are recognized as apprenticeable. Each of these occupations has a set of apprenticeship standards. Once the standards are developed for a particular occupation, they may be reused with minor modifications by program sponsors adapting as necessary to their own requirements. The staff of the registration agency provide extensive technical assistance to sponsors in the development and revision of their programs. The apprenticeship standards for an individual sponsor are developed on a one-time basis and are modified periodically, based upon changing requirements, such as changes in the collective bargaining agreement, major technological changes require changes in work processes and related training.

Approximately 1,000 new programs are registered each year, the majority of which basically use previously developed apprenticeship standards. The burden upon the respondents consists mostly of reviewing apprenticeship standards with the government representative and the apprentice, making minor modifications as necessary and formally agreeing to

them. The cost to the Federal Government is approximately \$66,000 (1,000 x 2 hours x \$33).

Cost: \$66,000-- Federal.

29.13

Federal annualized cost, which is on a one-time basis, is estimated at \$4,576 (26 SAAs x 4 hours x \$44 hourly wage of GS-13/5 according to OPM General Schedule, for the Locality Pay Area of the Rest of U.S., effective January 2011). This figure is based on the on-site reviews conducted by the Office of Apprenticeship State Directors of the records and procedures of the 26 SAAs.

Cost: \$4,576 -- Federal.

29.14 (g)

There is no cost to the Federal Government.

<u>Section</u>	<u>Total Cost</u>
29.3 and 29.7	\$382,338
29.5	66,000
29.13	4,576
29.14	----
Total (all sections)	\$452,914

15. Reasons for Program Change and Change in Burden

The change in the burden hours reflects a 43 percent decrease (from 27,006 to 15,233) from that of the previous PRA submission. Decreases occurred as follows in the number of:

1. new programs registered from 249 burden hrs. to 200 burden hrs or a 19.69 percent decrease.
2. new apprentices registered from 11,952 burden hrs. to 5,581 burden hrs. or a 53.30 percent decrease.
3. apprentices completed and cancelled from 8,300 burden hrs. to 5,760 burden hrs. or 30.60 percent decrease.

4. sponsors making responses to standards from 3,000 burden hrs. to 2,000 burden hours or 33.33 percent decrease.
5. SAAs reviewing and updating the standards from 3,200 burden hrs. to 1,600 burden hrs. or a 50 percent decrease.
6. SAAs updating and submitting documents for continued recognition from 56 burden hrs. to 52 burden hrs. or a 7.14 percent decrease.

Already elaborated above, additional changes and/or additions to the collection of information in this request include the following:

1. Section I, Program Registration -
 - a. Item Modifications update this Section so that it is consistent and aligned with Title 29 CFR Part 29.
 - Instruction Method - non-substantive change,
 - Occupation Training Approach - substantive change,
 - Interim Credentials - substantive change,
 - Probation Length in Hours - non-substantive change,
 - Number of Periods - non-substantive change, and
 - Program Registration Date - non-substantive change
 - c) In the "Public Protection" Statement, the estimated average response time change for Program Registration, Section I, is increased from 10 minutes to 12 minutes.
2. Section II, Apprentice Registration -
 - a. Part B, Item Modifications update this Section so that it is consistent and aligned with Title 29 CFR Part 29.
 - Interim Credentials - substantive change, and
 - Occupation Training Approach - substantive change.
 - c. Additional instructions in each section on those data elements which are not self-explanatory as requested previously by OMB. Also, other additions have been

incorporated to align the Form with the Final Rule of Title 29 CFR Part 30.

Youthbuild Apprenticeship Program, ETA 671A Section II:

The submission for this non-substantive change request incorrectly stated the annual national burden hours as 320; this was corrected, since the hour burden of .16 per participant multiplied by 1500 participants is 240 hours rather than 320 hours.

16. Publication Information

Summary information is used to respond to requests from senior management, Congress, public interest groups, the apprenticeship sponsor community, and the general public.

17. Reasons for Not Displaying Date OMB Approval Expires

ETA is not requesting a waiver for the display of the OMB expiration date. It will be displayed on the form and in any ETA/OA issuances.

18. Exceptions to Certification

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.