

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

Registered Apprenticeship-College Consortium

A. JUSTIFICATION

1. Reasons for Data Collection

The Secretary of Labor's Advisory Committee on Apprenticeship (ACA), which includes members from the employer, labor, and public sectors, has identified the articulation of the Registered Apprenticeship completion certificate for college credit as an important opportunity for apprentices to continue on a career pathway, enhance skill acquisition, and earn an associate's or bachelor's degree. Increasing articulation agreements between Registered Apprenticeship sponsors and colleges will also create a new pipeline of degree-seekers and enhance the competitiveness of American industry by enlarging the pool of highly-trained workers that possess in-demand skills and competencies. The U.S. Department of Labor (DOL), Employment and Training Administration (ETA), Office of Apprenticeship (OA) has identified 1,660 articulation agreements between Registered Apprenticeship sponsors and local two- and four-year colleges. There are many more of these agreements that OA will seek to identify. The agreements are not portable to other colleges; rather they are negotiated at the local level. The ACA requested that the DOL and Department of Education (DOE) jointly find a solution so that Registered Apprenticeship programs could be articulated to college credit on a national level.

Registered Apprenticeship pairs paid, on-the-job learning with related technical/theoretical classes in a career field. Industries and employers are highly involved in the development and implementation of the programs. The earn-while-you-learn model is extremely structured and rigorous, consisting of 144 hours of class time per year combined with a minimum of 2000 hours of on-the-job learning. Programs last between one and five years depending on the occupation. Registered Apprenticeships offer job seekers immediate employment opportunities that pay good wages and career growth, highly-sought life and skill sets, portable credentials and the opportunity to apply their apprenticeship training to two- and four-year post-secondary programs.

The Registered Apprenticeship system is administered by OA which oversees Registered Apprenticeship programs as well as State Apprenticeship Agencies (SAAs). The National Apprenticeship Act of 1937, (subsequently referred to as "the Act") 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) (for a copy of the Act, visit <http://www.doleta.gov/oa/history.cfm#amendments>). The administration of the system is guided by Title 29 CFR Part 29, regulations that were updated in 2008 to address 21st century workforce needs as well as enhance accountability of the OA.

The DOE Office of Adult and Vocational Education (OVAE) and the OA have worked jointly for a number of years on projects to enhance a pathway for adult learners from Registered Apprenticeship to an associate’s and bachelor’s degree with the goal of improved employment outcomes and higher earnings. The DOE recently released the Career Technical Education (CTE) Blueprint to transform the federally administered Carl D. Perkins Career Technical Education program. The CTE Blueprint supports articulation of Registered Apprenticeship and industry-based education and training programs into college academic credits. This blueprint will help better align programs and institutions, enhance a strong collaboration among secondary, postsecondary, Registered Apprenticeship, employer and industry partners and result in meaningful accountability for academic outcomes and building technical employability skills.

The ACA, with the support of DOL Assistant Secretary for Employment and Training, Jane Oates, and the DOE Assistant Secretary for Vocational and Adult Education, Brenda Dann-Messier, convened an ad-hoc workgroup in 2011 to increase articulation agreements among post-secondary education institutions and Registered Apprenticeship program sponsors. The workgroup is composed of ACA members, community college leaders, Registered Apprenticeship sponsors, American Association of Community Colleges (AACC) representatives, and leadership from OA and OVAE. The ad-hoc workgroup consulted with a broad group of colleges and Registered Apprenticeship sponsors to address the issue, explore possible organizational structures, develop a framework and put forth a proposal. Goals included (1) increased graduation rates, (2) increased number of people who earn a credential, (3) providing career paths leading to good jobs, (4) portability, (5) accessibility, and (6) sustainability. At the September 2011 meeting of the ACA, a proposal was adopted unanimously to form a national consortium based on the successful Servicemembers Opportunity Colleges (SOC) Consortium model. The SOC is a consortium of colleges that provides college articulation for soldiers and veterans who accumulate credits at a number of colleges. The SOC is supported by the Department of Defense. The ACA also adopted the Registered Apprenticeship-College Consortium Articulation Framework which outlines the goals of the consortium, the principles that guide the effort, conditions of membership, and criteria (Attachment 3).

The purpose of the data collection is to establish membership in the Registered Apprenticeship-College Consortium. The Consortium will have three types of members: two- and four-year post-secondary institutions, Registered Apprenticeship sponsors, and organizations and associations that represent institutions or sponsors on a national, regional or state level and serve in a coordinating role to facilitate membership in the consortium.

Post-secondary institution members must be listed in the Council for Higher Education Accreditation’s (CHEA) Database of Programs Accredited by Recognized U.S. Accrediting

Organizations and be a degree-granting institution that is duly accredited by a regional institutional accrediting agency recognized by the U.S. Department of Education or by the CHEA. They must agree to accept the Registered Apprenticeship completion certificate at the value assigned by a recognized third party accreditation evaluator for college credit, for purposes of facilitating the transfer of credit between consortium member colleges.

Registered Apprenticeship sponsor members must have a national, regional or local program or guideline standards that are registered with either the OA or SAA and submit to a program review performed by a national, regional, state or local educational entity for purposes of assessing program quality and rigor and determining credit value for learning acquired during Registered Apprenticeship.

“Other” organization or association members must represent two- and four-year post-secondary institutions on the national, regional or state level, or represent Registered Apprenticeship sponsors on the national, regional or state level, and must serve in a coordinating role to facilitate membership in the consortium.

The data collection includes the three application forms, one each for the three member categories of the consortium. The applications are based on the SOC Consortium application. The information will be on the Pathways to Success website at <http://pathwaystosuccess.workforce3one.org/>. To join the consortium, sponsors, colleges or associations will click a “join the consortium” box and the three possible categories will appear. They then click on the appropriate category and follow the prompts to fill out the on-line application (details listed below).

Users looking to find information about consortium members will go to the map on the home page, click on a state, and information will appear where the consortium members are located along with their information from the applications. This will facilitate graduates of apprenticeship programs being able to find colleges across the country that will accept their apprenticeship certificate for college credit.

Application for Post-Secondary Members

Step 1 asks for institutional information including name of the institution, address, phone number and website. The following information is requested by checking boxes: if RACC membership applies to a statewide system, an institution, or part of the institution; whether the institution is public or private, for-profit or non-profit; what regional accrediting organization grants it credit; if the institution offers apprenticeship-related instruction for credit or non-credit; what awards the institution offers; if the credit system is semester, quarter or trimester; and, in what states degree programs are operated.

Step 2 asks if the institution has articulation agreements with Registered Apprenticeship programs and if affirmative, to provide information on the program including the name of the program, the point of contact, address and the occupations. This section also requests a list of courses offered for the Registered Apprenticeship program and if they count as credit towards an associate’s or bachelor’s degree.

Step 3 covers undergraduate admissions, prior learning and non-traditional credit information. The section asks (by checking boxes) what, if any admissions and placement tests are required for apprentices seeking a degree, the amount of credit the institution will award for non-traditional learning, and the prior learning examinations that are accepted by the institution.

Step 4 asks for information for the RACC institutional representatives, a representative who will be the primary point of contact for parties interested in applying their apprenticeship completion certificate to college credit and the representative responsible for complying with the RACC.

Step 5 is the signatory page. The president, chancellor or other senior administrator authorized by the president or chancellor to make this commitment signs and includes his/her name, position, phone number and e-mail.

Application for Registered Apprenticeship Sponsors

Step 1 asks sponsor to self identify as a national sponsor that includes all or just select training centers; a regional sponsor that includes all or just select training centers; or a sponsor with a single site.

Step 2 requests point of contact information including name, title, sponsor name, address, phone, e-mail, and website.

Step 3 requests information on the third party evaluator who reviewed the program, including name, address, website and phone.

Step 4 asks for information from national and regional sponsors on the local training centers that are part of the apprenticeship program including the local point of contact including name, title, address, phone, e-mail, and website; it also requests the point of contact information for any 2- or 4-year colleges with which they have articulation agreements.

Step 5 asks for information for the RACC institutional representatives, a representative who will be the primary point of contact for parties interested in applying their apprenticeship completion certificate to college credit and the representative responsible for complying with the RACC.

Step 6 is the signatory page. The president or other senior administrator authorized by the president to make this commitment signs and includes his/her name, position, phone number and e-mail.

Application for “Other” Category Membership

Step 1 asks about the type of organization and group they represent. Response is by checking a box. The seven possible selections include national, state or regional representative of colleges; national, state or regional representatives of sponsors; and “other.”

Step 2 requests the point of contact information for the organization including name, address, phone and e-mail and what type of relationship it has with colleges or Registered Apprenticeship sponsors.

Step 3 requests the name and contact information for the RACC representative.

Step 4 is the signatory page. The president, CEO or other senior administrator authorized by the president or CEO to make this commitment signs and includes his/her name, position, phone number and e-mail.

Regulations

See OA's website at: <http://www.doleta.gov/oa/pdf/FinalRule29CFRPart29.pdf>

2. Purpose of Information Collection

The purpose of the information collection is to create a public database and website on the RACC members. Members will be Registered Apprenticeship sponsors, two- and four-year institutions and associations or organizations that represent sponsors and colleges. This will provide graduates of Registered Apprenticeship programs and other interested parties information on whether a Registered Apprenticeship program participates in the consortium, what colleges accept a Registered Apprenticeship completion certificate, and the credit value of that certificate. This will help many apprenticeship graduates who have moved from the location where they completed their apprenticeship to apply the certificate towards an associate's or bachelor's degree from a RACC college member in another location. Currently that is not possible. Sponsors and apprentices have voiced concern that they are not able to apply their Registered Apprenticeship certificate for college credit on a national scale. The consortium will facilitate that.

3. Technology to Reduce Burden

Consideration has been given to the use of improved information technology to reduce the burden. The consortium applications are web-based and easy to navigate. An OA employee will be available upon request to provide full technical assistance and services to those sponsors, colleges and "other" category organizations/associations that do not have computer technology available.

4. Duplication

Articulation agreement information is not required the Registered Apprenticeship Partner Information Data System (RAPIDS), nor is the Agency aware of any database that collects this information. There is no other consortium like this so the information requested is not duplicative.

5. Efforts to Reduce Burden on Small Businesses or Other Small Entities

The information collected by the Registered Apprenticeship-College Consortium does not have a significant impact on small businesses; however, this information collection requests only basic information to help apprenticeship graduates and other interested parties find the information needed to contact two- and four-year post-secondary institutions or a sponsor about applying their certificate to credit

The consortium information will be reviewed bi-annually by the institution to ensure that the point of contact information and the information on the articulation agreements are current. OA will send a form to the institutional member with the existing information., thus reducing burden for all respondents.

6. Consequences of Failure to Collect Data and Burden Reduction Obstacles

Failure to conduct this information collection would prevent creation of a public database and website on RACC members and keep Registered Apprenticeship program graduates and other interested parties from having information on whether a Registered Apprenticeship program participates in the consortium, which colleges accept a Registered Apprenticeship completion certificate, and the credit value of that certificate. The agency believes non-approval would particularly harm apprenticeship graduates who have moved from the location where they completed their apprenticeship. Joining the consortium and filling out the application is a voluntary process. A sponsor or college will only submit an application if they want to be a member. Information will be reviewed at the time of application by OA staff. We will request that contact information be updated if there are personnel or other changes, or if the entities withdraw from the consortium. The collection frequency 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.

8. Pre-Clearance Notice and Responses and Other Pre-clearance Outreach

A Pre-clearance Notice for sixty days' public comment was published in the Federal Register on January 11, 2013 (Vol.78, p 2443 *et seq*). No comments were received.

Additionally, the OA has begun to create a website where potential members can voluntarily fill out an on-line application and where the information will be housed after review by OA and OVAE. To be fully functional, three key phases of development need to occur. Phase 1 is the development of the data collection application—making the applications functional for the sponsors, post-secondary institutions and “other” organizations that will join the consortium. Phase 2 focuses on internal data usability to provide back-end search capability and data reporting. Phase 3 focuses on the end user to provide mapping and searching capability from the perspective of the external customer. OA has about 85 percent of Phase 1 completed. A significant investment is needed to complete Phases 1, 2 and 3. OA consulted with three

colleges and one sponsor—two of which are members of the Secretary of Labor’s ACA Ad-Hoc workgroup—to test the site. Testers found no issues with the application questions but there were computer-related issues such as inability to save information and go back to the site and the inability to backtrack to a previous step which need to be fixed before the collection phase of the site is fully operational.

As mentioned in item 1, the DOE Office of Adult and Vocational Education (OVAE) and the OA have worked jointly for a number of years on projects to enhance a pathway for adult learners from Registered Apprenticeship to an associate’s and bachelor’s degree with the goal of improved employment outcomes and higher earnings. The DOE recently released the Career Technical Education (CTE) Blueprint to transform the federally administered Carl D. Perkins Career Technical Education program. The CTE Blueprint supports articulation of Registered Apprenticeship and industry-based education and training programs into college academic credits. This blueprint will help better align programs and institutions, enhance a strong collaboration among secondary, postsecondary, Registered Apprenticeship, employer and industry partners and result in meaningful accountability for academic outcomes and building technical employability skills.

As also mentioned in item 1, the ACA convened an ad-hoc workgroup in 2011 to increase articulation agreements among post-secondary education institutions and Registered Apprenticeship program sponsors. The workgroup is composed of ACA members, community college leaders, Registered Apprenticeship sponsors, AACC representatives, and leadership from OA and OVAE. The ad-hoc workgroup consulted with a broad group of colleges and Registered Apprenticeship sponsors to address the issue, explore possible organizational structures, develop a framework and put forth a proposal. At the September 2011 meeting of the ACA, a proposal was adopted unanimously to form a national consortium. The ACA also adopted the Registered Apprenticeship-College Consortium Articulation Framework which outlines the goals of the consortium, the principles that guide the effort, conditions of membership, and criteria.

9. Payments to Respondents

This information collection does not involve direct payments to respondents. The OA does not provide funding to Registered Apprenticeship sponsors, two- and four-year post-secondary institutions or national, regional or state organizations that represent sponsors or post-secondary institutions.

10. Confidentiality

No assurance of confidentiality is provided, and information collected will be posted on a public website. The agency notes, however, that no confidential information is requested.

11. Questions of a Sensitive Nature

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

12. Respondent Annual Burden

The purpose of the data collection is to establish membership in the Registered Apprenticeship-College Consortium. The Consortium will have three types of members: two- and four-year post-secondary institutions, Registered Apprenticeship sponsors, and organizations and associations that represent institutions or sponsors on a national, regional or state level and serve in a coordinating role to facilitate membership in the consortium. There will be a one-time data entry burden to establish membership for all categories. Members will be asked to update information on a two-year basis, particularly regarding point of contact and additions or changes on articulation agreements with institutions and sponsors so our website is current. OA will ensure that updated information comes from the authorized organization by having updates go to a designated e-mail account. Upon receipt and review, OA staff will verbally verify the information with the organization. For sponsors and institutions with 20 or more agreements, OA staff will enter data from a spreadsheet provided by those organizations.

A. Two- and Four-Year Post-Secondary Institution Membership

The application asks for readily available information about the institution and its associated Registered Apprenticeship programs (if any) that requires minimum to little preparation time to gather or research. The application is broken into the following four sections: (1) institutional information, (2) undergraduate admissions/placement tests, (3) non-traditional credit information, and (4) affirmation of compliance with RACC principles and criteria.

In addition to point of contact information, the application is largely comprised of check boxes and yes/no questions. The one major exception to this approach is a request for summary information regarding related instruction to any Registered Apprenticeship programs. In particular, this section requests a listing of courses, related occupations, and Registered Apprenticeship sponsor information.

The OA estimates that it will take a representative from a post-secondary institution approximately 10 minutes to enter information on each articulation agreement, including the time necessary to research and gather information. There are 1,700 known articulation agreements between Registered Apprenticeship sponsors and 422 two- and four-year post-secondary institutions in the 26 states that are managed by the federal OA. Based on meetings with two- and four-year post-secondary institutions, there appears to be widespread interest in joining a consortium. As such, it is anticipated that 500 institutions nationwide will voluntarily join the consortium in the first year with approximately 50 joining per year in subsequent years. However, we do not have detailed information on the number of articulation agreements that exist across the nation, as that information is not required in the Registered Apprenticeship Partner Information Data System (RAPIDS). To assist institutions in their reporting, OA staff will be available to enter the data for those institutions that have 20 or more articulation agreements. Instead of entering the articulation agreements online, institutions with 20 or more agreements will be encouraged to submit a data spreadsheet of relevant information directly to OA staff.

Based on our knowledge of the two- and four-year post-secondary institutions in states that are managed by the OA, below is an estimate of the average number of articulation agreements at the 500 two- and four-year post-secondary institutions expected to join the consortium during the first year:

Number of Articulation Agreements per Institution	Number of Institutions	Percentage
1	330	66%
2-5	75	15%
6-10	50	10%
11-19	25	5%
20 or more	20	4%
Total	500	100%

First Year

Of the 500 two- and four-year post-secondary institutions expected to join the consortium in the first year, 20 of these institutions are estimated to have 20 or more articulation agreements. Thus, 480 institutions will enter their agreements using the online form and 20 will provide a file transfer of the information.

Of these 480 institutions that will enter their agreements using the online form, it is estimated that 330 of the institutions will have 1 articulation agreement and 75 of the institutions will have between 2 and 5 agreements. The remaining 75 institutions will have between 6 and 19 articulation agreements, with the majority having less than 10 agreements.

The estimate of the total number of articulation agreements entered online is as follows:

- 330 institutions will have 1 agreement
- 75 institutions having an average of 3 agreements
- 50 institutions will have an average of 8 agreements
- 25 institutions will have an average of 15 agreements

Number of Institutions	Average Number of Articulation Agreements per Institution	Total Number of Articulation Agreements
330	1	330
75	3	225
50	8	400
25	15	375
Total number of articulation agreements estimated to be entered online by two- and four-year post-secondary institutions during the first year		1,330

Total First Year Burden = 232 hours

- Online Applications: 480 Institutions—1,330 articulation agreements x 10 minutes per agreement to enter online. This equates to 13,300 minutes or 222 hours.

- File Transfers: 20 Institutions— 20 file transfers to OA staff x 30 minutes per file (this includes the time to create the file). This equates to 600 minutes or 10 hours.

Annual Burden after the First Year

Of the 50 two- and four-year post-secondary institutions per year expected to join the consortium after the first year, it is estimated that 80 percent (40) of the institutions will have 1 articulation agreement and 10 percent (5) of the institutions will have between 2 and 5 agreements. The remaining institutions will have between 6 and 19 articulation agreements, with the majority having less than 10 agreements.

Number of Articulation Agreements per Institution	Number of Institutions	Percentage
1	33	66%
2-5	7	14%
6-10	5	10%
11-19	3	6%
20 or more	2	4%
Total	50	100%

The estimate of the total number of articulation agreements entered online is as follows:

Number of Institutions	Average Number of Articulation Agreements per Institution	Total Number of Articulation Agreements
33	1	33
7	3	21
5	8	40
3	15	45
Total number of articulation agreements estimated to be entered by two- and four-year post-secondary institutions on an annual basis		139

Annual Burden after the First Year = 24 hours

- Online Applications: 48 Institutions—139 articulation agreements x 10 minutes per agreement to enter online. This equates to 1,390 minutes or 23 hours.
- File Transfers: 2 Institutions—2 file transfers to OA staff x 30 minutes per file (this includes the time to create the file). This equates to 60 minutes or 1 hour.

Summary

Total Three Year Burden

Period	Burden Hours
First Year	232
Second Year	24
Third Year	24
Total Estimated Three Year Burden	280

Institutions—Annualized Burden Hours

Average Number of Institutions per Year = $(500+50+50)/3$ years	200
Average Number of Articulation Agreements per Year Entered Online = $(1,330+139+139)/3$ years	536
Average Number of Articulation Agreements per Year by File Transfer = $(20+2+2)/3$ years	8
Institutions—Annualized Burden Hours = $(536 \text{ agreements entered online per year} \times 10 \text{ minutes per agreement})/60 \text{ minutes}$ + $(8 \text{ file transfer per year} \times 30 \text{ minutes})/60 \text{ minutes}$	93.3 hours

The consortium information will be reviewed bi-annually (i.e., once every two years) by the institution to ensure that the point of contact information and the information on the articulation agreements are current. OA will send a form to the institutional member with the existing information. It should take five minutes per articulation agreement to review and update the information (if necessary). The total respondent cost is \$1,100 for the first year of the consortium ($\{[1,330 \text{ articulation agreements} \times 0.5 \text{ reviews per year}] \times [5 \text{ minutes}] / 60 \text{ minutes}\}$ 55 hours \times \$20*). The additional respondent cost for 50 new members to the consortium per year is estimated to be \$120 ($\{[139 \text{ articulation} \times 0.5 \text{ reviews per year}] \times [5 \text{ minutes}] / 60 \text{ minutes}\}$ 6 hours \times \$20*).

* The \$20 mean hourly rate [rounded to the nearest dollar] for the institution's clerical staff was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Earnings in the United States, 2010, Bulletin 2753 May 2011, Secretaries, Table 4, December 2009-January 2011.

Total respondent cost for the first three years of the consortium is estimated to be **\$3,660** ($\$1,100 \times 3 + \$120 \times 2 + \120). The average annual equivalent salary cost for the burden hours will be \$1,220.

NOTE: For reginfo.gov database estimate purposes, ETA assumes that 90% of the responses will come from the private sector and 10% would come from Federal government agencies (5%) and state (3%), local (1%), or tribal (1%) governments.

B. Registered Apprenticeship Sponsor Membership

The application asks for readily available information from the program sponsor and its associated Registered Apprenticeship program's articulation agreement and the third party assessment that requires minimum to little preparation time to gather or research.

In addition to point of contact information the application is largely comprised of summary questions regarding articulation agreements. NOTE: For reginfo.gov database estimate purposes, ETA assumes that 90% of the sponsors come from the private sector and the remaining

10% of the sponsors would be from Federal government agencies (5%); and state (3%), local (1%), or tribal (1%) governments..

OA estimates that it will take a representative from a program sponsor approximately 10 minutes to enter information on each articulation agreement, including the time necessary to research and gather information. Of the 24,967 active programs nationwide in Fiscal Year (FY) 2011, approximately 5,000 programs have five or more apprentices and 75 are large national programs. It is anticipated that 140 program sponsors will voluntarily join the consortium in the first year—40 of the large national programs with 20 or more articulation agreements will provide data electronically and 100 program sponsors will register online. It is also anticipated that 30 program sponsors will voluntarily join the consortium in each subsequent year—5 large national programs with 20 or more articulation agreements will provide data electronically and 25 program sponsors will register online. We do not have detailed information on the number of articulation agreements as that information is not required in the Registered Apprenticeship Partner Information Data System (RAPIDS). To assist institutions in their reporting, OA staff will enter the data for national sponsors that have 20 or more articulation agreements. The national sponsors with 20 or more agreements will submit a data spreadsheet with the information that they should easily obtain from their IT departments.

Based on our knowledge of the programs managed by OA staff, below is estimate of the average number of articulation agreements associated with the 140 program sponsors expected to join the consortium during the first year:

Number of Articulation Agreements per Sponsor	Number of Sponsors	Percentage
1	80	57%
2-5	10	7%
6-10	6	4%
11-19	4	3%
20 or more	40	29%
Total	140	100%

First Year

Of the 100 program sponsors that will enter their agreements using the online form, it is estimated that 80 of the sponsors will have 1 articulation agreement and 10 of the sponsors will have between 2 and 5 agreements. The remaining 10 program sponsors will have between 6 and 19 articulation agreements, with the majority having less than 10 agreements.

The estimate of the total number of articulation agreements entered online is as follows:

- 80 institutions will have 1 agreement
- 10 institutions having an average of 3 agreements
- 6 institutions will have an average of 8 agreements
- 4 institutions will have an average of 15 agreements

Number of Sponsors	Average Number of Articulation Agreements per Sponsor	Total Number of Articulation Agreements
80	1	80
10	3	30
6	8	48
4	15	60
Total number of articulation agreements estimated to be entered by program sponsors during the first year		218

Total First Year Burden = 56.5 hours

- Online Applications: 100 program sponsors = 218 articulation agreements x 10 minutes per agreement to enter online. This equates to 2,180 minutes or 36.5 hours.
- File Transfers: 40 program sponsors = file transfer to OA staff x 30 minutes. This equates to 1,200 minutes or 20 hours.

Annual Burden after the First Year

Of the 25 program sponsors per year expected to join the consortium after the first year by entering their agreements using the online form, it is estimated that 20 of the sponsors will have 1 articulation agreement and 2 sponsors will have between 2 and 5 agreements. The remaining 3 sponsors will have between 6 and 19 articulation agreements, with most having fewer than 10 agreements. The estimate of the total number of articulation agreements is as follows:

Number of Sponsors	Average Number of Articulation Agreements per Sponsor	Total Number of Articulation Agreements
20	1	20
2	3	6
2	8	16
1	15	15
Total number of articulation agreements estimated to be entered by program sponsors on an annual basis		57

Annual Burden after the First Year = 12 hours

- Online Applications: 25 program sponsors = 57 articulation agreements x 10 minutes per agreement to enter online. This equates to 570 minutes or 9.5 hours.
- File Transfers: 5 program sponsors = file transfer to OA staff x 30 minutes. This equates to 150 minutes or 2.5 hours.

Period	Burden Hours
First Year	56.5
Second Year	12
Third Year	12
Total Three Year Burden	80.5

Program Sponsors—Annualized Burden Hours

Average Number of Program Sponsors per Year = $(140+30+30)/3$ years	67
Average Number of Articulation Agreements per Year Entered Online = $(218+57+57)/3$ years	111
Average Number of Articulation Agreements per Year by File Transfer = $(40+5+5)/3$ years	17
Program Sponsors—Annualized Burden Hours = $(111 \text{ agreements entered online per year} \times 10 \text{ minutes per agreement})/60 \text{ minutes}$ + $(17 \text{ file transfer per year} \times 30 \text{ minutes})/60 \text{ minutes}$	27 hours

The consortium information will be reviewed bi-annually (i.e., once every two years) by the program sponsors to ensure that the point of contact information and the information on the articulation agreements are current. OA will send a form to the program sponsors with the existing information. It should take five minutes per articulation agreement to review and update the information (if necessary). The respondent cost is \$180 for the first year of the consortium ($\{[218 \text{ articulation agreements} \times 0.5 \text{ reviews per year}] \times [5 \text{ minutes}] / 60 \text{ minutes}\}$ 9hours x \$20*). The additional respondent cost for 25 new members to the consortium per year is estimated to be \$50 ($\{[57 \text{ articulation reviews per year} \times 0.5] \times [5 \text{ minutes}] / 60 \text{ minutes}\}$ 2.5 hours x \$20*).

* The \$20 mean hourly rate [rounded to the nearest dollar] for the institution's clerical staff was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Earnings in the United States, 2010, Bulletin 2753 May 2011, Secretaries, Table 4, December 2009-January 2011.

Total respondent cost for the first three years of the consortium is estimated to be **\$690** ($\$180 \times 3 + \$50 \times 2 + \50).

C. National, Regional, or State Associations or Other Organizational Memberships

The application asks for readily available information from national, regional, or state associations or other organizations that represent colleges and Registered Apprenticeship sponsors that requires minimum to little preparation time to gather or research.

OA estimates that it will take a representative from an association or other organization approximately 10 minutes to complete the application, including the time necessary to research and gather information. It is anticipated that 10 associations/organizations per year will voluntarily join the consortium.

Total Annual Burden: $(10 \text{ minutes} \times 10 \text{ organization}) / 60 \text{ minutes} = 2 \text{ hours}$

Summary

Period	Burden Hours
First Year	2
Second Year	2
Third Year	2
Total Three Year Burden	6

Associations/Other Organizational Memberships—Annualized Burden Hours

Average Number of Associations/Other Organizational Memberships per Year = (10+10+10)/3 years	10
Average Number of Applications per Year = (10+10+10)/3 years	10
Associations/Other Organizational Memberships—Annualized Burden Hours = (10 applications per year x 10 minutes per application)/60 minutes	2 hours

The consortium information will be reviewed bi-annually (i.e., once every two years) by each association to ensure that the point of contact information and information on the articulation agreements are current. OA will send a form to the associations with the existing information. It should take five minutes per form to review and update the information (if necessary). The annual respondent cost is \$10 ($\{[10 \times 0.5] \times [5 \text{ minutes}] / 60 \text{ minutes}\} \times 0.5 \text{ hours} \times \20^*).

* The \$20 mean hourly rate [rounded to the nearest dollar] for the program sponsor's clerical staff was obtained from the U.S. DOL/BLS National Compensation Survey: Occupational Earnings in the United States, 2010, Bulletin 2753 May 2011, Secretaries, Table 4, December 2009-January 2011.

Total respondent cost for the first three years of the consortium is estimated to be **\$60** ($\$10 \times 3 + \$10 \times 2 + \10).

D. Burden Summary for the Three Applications

First Year = 290.5 hours

Application	Burden Hours
Two- and Four-Year Post-Secondary Institutions	232
Registered Apprenticeship Sponsor	56.5
Associations and Other Organizations	2

Annual Burden Hours (after the first year) = 38 hours

Application	Burden Hours
Two- and Four-Year Post-Secondary Institutions	24
Registered Apprenticeship Sponsor	12
Associations and Other Organizations	2

TOTAL BURDEN HOURS: 366.5 hours (first three years)

ANNUALIZED BURDEN HOURS: **122.2 hours**

Application	Respondent Cost
Two- and Four-Year Post-Secondary Institutions	\$3,660
Registered Apprenticeship Sponsor	\$690
Associations and Other Organizations	\$60

TOTAL RESPONDENT COST: \$4,410

ANNUALIZED RESPONDENT COST: **\$1,470**

13. Estimated Cost to Respondents

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

14. Cost to Federal Government

The cost to develop and maintain the online form/website to gather and track information for this collection for the first three years, including the one-time development costs is estimated at \$137,000. The prototype system cost \$64,000 to develop, of which \$8,600 of these funds were spent developing the RACC applications tool. To complete the system, including ensuring the site is 508 compliant, is estimated to cost an additional \$70,000 including upgrades and new features for linking the RACC application tool to the broader Pathways tool. This will allow consortium member information to be placed on a map and easily available and searchable to the public. The annual maintenance cost is expected to be less than \$1,000 since the website will be hosted as part of a larger contract.

The burden to the Federal government based on the GS-12/1 salary of \$36 per hour (rounded to the nearest dollar from OPM General Schedule for the Locality Pay Area of the Rest of U.S.

effective January 2012) is primarily for reviewing the materials submitted by the sponsors and data entry activities involving respondents that have 20 or more articulation agreements.

During the first year, it is estimated that 25 institutions and 40 large national programs with twenty or more articulation agreements will join the consortium. These 65 respondents will submit directly to OA staff a data spread sheet with the information. It is anticipated that it will take on average 45 minutes per respondent for staff to data entry the relative information. The annualized cost to the Federal government for this activity is **\$1,755** (65 respondents x 45 minutes, which equates to 48.75 hours x \$36).

In addition to data entry activities, it is estimated that 1,550 articulation agreements will be added to the consortium during the first year and it will take 5 minute to review and post each agreement. The annualized cost to the Federal government for this activity is **\$4,651** (1,550 applications x 5 minutes, which equates to 129.2 hours x \$36).

The annual cost of reviewing the anticipated 198 articulation agreements that will be added to the consortium on an annual basis is **\$594** (198 applications X 5 minutes, which equates to 16.5 hours x \$36).

One time development cost: \$134,000

Annual maintenance cost: \$1,000

Total three year cost for maintenance: \$3,000

The total first year cost to the Federal government for data input: \$6,406

The annual cost to the Federal government (after the first year) for data input/review: \$594

Total three year cost to the Federal government for data input/review: \$7,594

Annualized cost to the Federal government: **\$48,198**

15. Reasons for Program Change and Change in Burden

This is a new collection.

16. Publication Information

All information provided will be available, upon agency staff review, on the website and accessible to the 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 website 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.