

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL  
UNDER THE PAPERWORK REDUCTION ACT OF 1995**

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**SUPPORTING STATEMENT FOR  
PAPERWORK REDUCTION ACT SUBMISSIONS  
DOMESTIC AGRICULTURAL IN-SEASON WAGE REPORT  
AND  
WAGE SURVEY INTERVIEW RECORD**

The Department is requesting a 3-year approval for revisions to the Domestic Agricultural In-Season Wage Report and the Wage Survey Interview Record (OMB control number 1205-0017). ETA collects prevailing wage rate calculations from each State Workforce Agency (SWA) through ETA Form 232, the Domestic Agricultural In-Season Wage Report. ETA Form 232's calculated prevailing wage rate finding is based on data collected by the SWAs from employers in a specific crop area using the ETA Form 232A, the Wage Survey Interview Record. The Department is proposing changes to this collection. The Department is attempting to streamline the process by removing some of the outdated questions on the ETA Form 232 and ETA Form 232A. In addition, the Department would like to move the instructions on how to complete the form and calculate the prevailing wage determination from the ETA Handbook 385 into the instructions for the form to make them easier to find. The changes are explained in detail below.

**ETA Form 232, Domestic Agricultural In-Season Wage Report**

ETA Form 232 is the reporting device for SWAs to calculate and submit prevailing wage rate calculations to the Department.

- In the Header Section of the Form, the Department proposes to add "Occupation/Activity" and "Crop/Agricultural Commodity" to the section. This will more clearly label to which sector and occupation each ETA Form 232 applies.
- The Department proposes to add a field to record a resubmission or revised survey.
- The Department proposes to relocate Section 1, the Prevailing Wage Rate Findings, to the new Section 4 and delete part (b) "Instate" and (c) "Interstate (including Contract P[uerto] R[ican])". The surveys are currently broken out into instate and interstate worker categories. According to ETA Handbook 385, the two categories added together constitute the third grouping, the all worker category. Separate arrays are to be made for all three groups, and the established 40/51 percent rules from ETA Handbook 385 are applied. Prevailing wage determinations are then made for each category. However, according to the methodology of the ETA Handbook 385, if the number of workers in either the intrastate or interstate category is less than 25 percent of the total workers in the survey, a determination cannot be made, i.e., the 25 percent rule of the ETA Handbook 385 applies. The intent of dividing workers into instate and interstate groupings was to prevent migrant workers (both legal and illegal) from driving down instate wages. However, many SWAs can no longer categorize the data into instate or interstate workers. Part of the reason is the SWAs' own limited

resources, but another reason is that employers do not always require employees to disclose their domiciles. ETA has found that not enough data on instate versus interstate employees is collected to create statistically valid prevailing wage calculations for the separate groups. Therefore, the Department is no longer requiring the SWAs to report interstate or instate wage rates.

- In Section 2 (renumbered as Section 1) of the Report, the Department proposes to eliminate items (b) “Contract Foreign Workers”; (c) 1. “Instate (Local and Interstate)”; (c) 2. “Interstate (Excl. Cont. P.R.)”; and (c) 3. “Contract Puerto Rican” from this section. Instead, the form will ask for “Estimated number of U.S. workers” and the sources used to estimate the number of employers and U.S. workers engaged in the crop/agricultural commodity and occupation/activity in the wage reporting area.
- In Section 3 (renumbered as Section 2) of the Report, the Department proposes to keep (a) the “Total Number of Employers Contacted during the Survey”, delete “Percent of Total in Crop Activity”, and to add “(b) Total number of respondents, (c) Total number of employer-respondents who employ U.S. workers, (d) Total number of U.S. workers reported by employers,” and “(e) Identify method(s) of contact.” These new fields will make the results of the surveys easier to validate.
- In Section 4 (renumbered as Section 3) of the Report, the Department proposes to rename this section “Reported Wage Rates for U.S. Workers” and replace columns II, III, and IV, which break down U.S. workers into total, instate, and interstate categories, with one column for the total number of U.S. workers. The Department also proposes to add a column to specify the precise unit in which the wage rate is measured, such as per hour.
- The Department proposes to reorganize Section 5 of the Report and to eliminate the worker interviews column because most states no longer conduct field surveys due to reduced funding. They are opting for mail, fax, or telephone surveys thereby making the worker interview process obsolete.
- In Section 6 of the Report, the Department proposes to combine the comments subsections (a), (b), and (c) into one entry space for all comments.
- The Department proposes to replace the signature box, title box, and date box with Section 7, which collects the SWA Point of Contact’s mailing address, email address, and telephone number.
- Instructions have been added to reduce the need to refer to the ETA Handbook 385 and to make locating the prevailing wage setting methodology easier for SWA staff.

## ETA Form 232A, Wage Survey Interview Record

The ETA Form 232A is a tool to assist SWAs in collecting information from agricultural employers from which they can calculate prevailing wage information on the ETA Form 232. It is not submitted to the Department.

- In the Header Section, the Department is reorganizing the data elements and moving the information regarding the interviewed employer from the bottom of the form to the top of the form for easier use.
- The Department is deleting Item 4, Time of survey, Item 6, Percentage of Active Acreage Completed, Item 10, Number of Foreign Workers, and Item 12, Local office Address, from the ETA Form 232A as these data elements are not useful to the SWA in making prevailing wage calculations.
- In Part I, the Department is deleting the Instate (Local and Interstate) column (Column D) and the Interstate (Including Contract Puerto Rican) column (Column E).
- In Part II the Department is deleting the Worker Interviews columns (Column F and G) because most states no longer conduct field surveys due to reduced funding. They are opting for mail, fax, or telephone surveys thereby making the worker interview process obsolete.
- The Department is adding Part IV, which provides space for the SWA Point of Contact's name and contact information.
- Instructions have been added to eliminate the need to refer to the ETA Handbook 385 and to make locating the prevailing wage setting methodology easier for SWA staff.

### A. JUSTIFICATION

#### *A.1 Circumstances Necessitating Data Collection*

The Department is requesting a 3-year approval for revisions to the Domestic Agricultural In-Season Wage Report, ETA Form 232, and the Wage Survey Interview Record, ETA Form 232A (OMB control number 1205-0017). The Wagner-Peyser Act tasks the Department of Labor (Department) with “promoting uniformity in [State public employment services’] administrative and statistical procedure, furnishing and publishing information as to opportunities for employment and other information of value in the operation of the system, and maintaining a system for clearing labor between the States.” 29 U.S.C. 49b(a). The prevailing rate is used to implement the Secretary's regulations on intrastate and interstate recruitment of farmworkers. 20 CFR 653.500, 655.150-158. Intrastate job orders must offer “wages and working conditions [that] are

not less than the prevailing wages and working conditions among similarly employed agricultural workers in the area of intended employment or the applicable Federal or State minimum wage, whichever is higher.” 20 CFR 653.501(d)(4).

The Employment and Training Administration (ETA) of the Department is responsible for administering the H-2A program, which provides for the filing of temporary employment certification applications by employers who seek to use foreign workers in agricultural work. Regulations issued under the Immigration Reform and Control Act of 1986 for the temporary employment of alien agricultural and logging workers in the United States, 20 CFR part. 655, subpart B, require employers to pay “at least the [adverse effect wage rate], the prevailing hourly wage rate, the prevailing piece rate, the agreed-upon collective bargaining rate, or the Federal or State minimum wage rate, in effect at the time the work is performed, whichever is highest ....” 20 CFR 655.122(l). ETA Form 232 and ETA Form 232A are the Department’s uniform administrative procedure for collecting information that will permit it to determine and publish prevailing wage rates in agricultural employment to be used in administration of the H-2A program.

In addition, the Department is requesting to move reporting and accounting of the information collecting burden associated with determining prevailing employment practices from OMB Control Number 1205-0457 to OMB Control Number 1205-0017. Department regulations require that “[e]ach job qualification and requirement listed in the [H-2A] job offer must be bona fide and consistent with the normal and accepted qualifications required by employers that do not use H-2A workers in the same or comparable occupation and crops.” 20 CFR 655.122(b). Similarly, intrastate agricultural job clearance requires that “[t]he wages and working conditions offered are not less than the prevailing wages and working conditions among similarly employed agricultural workers in the area of intended employment ....” 20 CFR 653.501(d)(4). In order to arrive at determinations as to whether certain working conditions meet these standards, the SWAs collect such information by either formally surveying employers’ prevailing practices or by conducting “ad hoc” surveys. The burden information for these prevailing practice determinations is currently accounted for in OMB Control Number 1205-0457, in which the SWAs report their overall activities to ETA for grant making purposes. However, ETA believes that the work required to determine the prevailing practice in an area of employment more logically fits in with the process used to determine the prevailing wages in an area of employment, as the surveys are often conducted concurrently. The Department will submit a non-material change request to the 1205-0457 to reflect the corresponding reduction after OMB approves this 1205-0017 ICR.

#### *A.2 How, by Whom, and For What Purpose the Information is to be Used*

Each year, SWAs provide the ETA Office of Foreign Labor Certification (OFLC) with plans for conducting agricultural wage surveys. The plan identifies (1) the crop and areas to be covered by the survey, (2) the sampling procedures to be used, and (3) any additional information that may be required by OFLC. The plan is reviewed and evaluated by OFLC staff. The SWA then obtains information from farm employers by

one or more of the following methods: personal interview, mail, e-mail, fax, or telephone interview. The information obtained is recorded onto ETA Form 232A, Wage Survey Interview Record. The information collected includes the wage rates paid, the number of domestic workers, data related to productivity, and the hourly earnings of piece rate workers by crop area and crop activity. The ETA 232A data is evaluated, summarized, and arrayed onto ETA Form 232 by the SWA staff. The SWA then computes the prevailing hourly wage rate and the prevailing piece rate on ETA Form 232, which is used to report the prevailing wage rates and analysis to the OFLC for approval.

The prevailing practice survey information is used by the Department to determine the normal, common and/or prevailing employment practices in a specific occupational classification. The Department uses the collected prevailing practice survey information to ensure that an H-2A employer's job qualifications and requirements are consistent with the normal and accepted job qualifications and requirements, as required by non H-2A employers or workers employed in the same or comparable occupations and crops.

#### *A.3 Use of Technology to Reduce Burden*

Along with collecting data by personal visits, mail, and telephone, use of e-mails and faxes are now common methods of collecting information from farm employers. The OFLC has initiated the electronic transmission of certified prevailing wage surveys to its Chicago National Processing Centers (NPCs) to expedite the wage determination process. SWAs may submit a completed ETA Form 232 to the OFLC electronically or via fax. Information regarding the purpose, data collection procedures, and the resulting prevailing wage findings are available to the general public (including employers and workers) via the OFLC website at <http://www.foreignlaborcert.doleta.gov/> and the Agricultural On-line Wage Library at <http://www.foreignlaborcert.doleta.gov/aowl.cfm>.

#### *A.4 Efforts to Identify Duplication*

There is no information being collected that could be used to determine prevailing wages other than through the ETA Form 232 and ETA Form 232A. The wage report is unique because it is the only survey conducted for a specific crop or livestock activity in a specific area for a specific period or point of time during the harvest or work season.

#### *A.5 Methods to Minimize Burden on Small Businesses*

The efforts to streamline the information collection and reporting process and to reduce total employer respondent burden described above in item A.3 also apply to any small businesses responding to the collection effort.

#### *A.6 Consequences of Less Frequent Data Collection*

If the wage information collected in the ETA Form 232 and ETA Form 232A is not collected on an annual basis, the Department will be unable to administer the provisions of 20 CFR part 653, subpart F and part 655, subpart B. Because the vast majority of H-2A applications seeking temporary labor certification for agricultural workers under these regulations occur on an annual basis, current prevailing wage data are required each year in order to process the intrastate and interstate job orders. The use of wage data from earlier surveys would result in inaccurate wage determinations, wage distortions, and potential legal issues from the farmworker advocacy groups and the employer community.

The secondary collection of data pursuant to prevailing practice surveys is required to assess employer practices with respect to job qualifications and requirements and working conditions. This provides the Department with current labor market information necessary to process H-2A labor certification applications and ensure that there is no adverse effect on U.S. workers similarly employed. Less frequent collection of this information would be contrary to the Department's statutory mandate to ensure that the employment of H-2A workers would not have an adverse effect on the employment opportunities, wages, and working conditions of U.S. workers who are similarly employed.

#### *A.7 Special Circumstances for Data Collection*

These data collection efforts do not involve any special circumstances.

#### *A.8 Federal Register Notice and Consultation Outside the Agency*

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to comment on the proposed revisions. (78 FR 32460, May 30, 2013.) The Department received one comment from an individual who expressed a dislike for all immigration programs, but did not make any comments specific to the information collection.

#### *A.9 Payment or Gifts to Respondents*

There is no payment to respondents involved with this information collection.

#### *A.10 Confidentiality Assurances*

Although SWAs collect data about individual employers' practices, including name and address of employer, wage rates, units of production, and average hourly earnings, using ETA Form 232A, the Department does not receive this form or any individually identifiable employer data. The Department receives only aggregate summary data of all employers responding to a wage report contained in ETA Form 232. The instructions

for ETA Form 232A state that the form “should be maintained in a confidential manner since it identifies specific employers and contains information which is confidential in nature.”

#### *A.11 Additional Justification for Sensitive Questions*

There are no sensitive questions included in the proposed data collection.

#### *A.12 Estimates of the Burden of Data Collection*

The annual national burden for this information collection has the following components: (1) the ETA Form 232A reporting burden; (2) the ETA Form 232 reporting burden; (3) prevailing practice surveys; and (4) ad hoc employment practice surveys. This response provides a separate burden for each of the components.

(1). ETA Form 232A: This report is usually completed by the employer unless the SWA conducts an in-person or telephone interview with the employer, in which case it is used as a record of the interview with each individual employer during the prevailing wage survey. ETA Form 232A has two burdens, one on the SWA, and one on the employer respondents. The SWA burden is accounted for below in #2. The hourly burden on the employer for this report is based on the actual experience of agricultural employers and remains unchanged from previous OMB packages. On average, agricultural employers spend approximately 15 minutes, or  $\frac{1}{4}$  hour, either completing the form or providing information to the SWA for inclusion on the ETA Form 232A of which the SWAs receive 14,608 yearly ( $14,608 \times .25$  hours = 3,652 total reporting burden hours). The total annual cost burden on respondents of collecting information on the ETA Form 232A (\$113,541) is based on the average hourly rate of \$31.09 for Farm, Ranch, and Other Agricultural Managers published by the Bureau of Labor Statistics in O\*Net Online at <http://www.onetonline.org/link/summary/11-9013.02>.

(2). ETA Form 232: SWAs aggregate information collected on ETA Form 232As on the ETA Form 232. The information contained on ETA Form 232 is compiled within two weeks after the completion of the ETA Form 232As. The hourly burden for this report is based upon the actual experience of State Workforce Agency staff in collecting the ETA Form 232A (whether conducting the interviews directly with the employer or mailing and receiving the form) and aggregating the individual results by area and by crop activity for reporting to the Department. On average, State Workforce Agency staff spends approximately 11 hours collecting ETA Form 232As and then completing, validating, and submitting information on the ETA Form 232 of which OFLC receives 600 per year ( $600 \times 11 = 6,600$  total reporting burden hours). The total annual cost of collecting information on the ETA Form 232 (\$127,380) is based on the average hourly rate of \$19.30 for survey researchers based on the median national wage as published by the Bureau of Labor Statistics in O\*Net Online at <http://www.onetonline.org/link/summary/19-3022.00>.



(3). Prevailing practice surveys: There are 54 SWAs in States and territories that conduct prevailing employment practice surveys of agricultural employment, but not necessarily each year. Each year the Department receives prevailing employment practice surveys from an average of 30 States and territories; however some SWAs conduct over 300 surveys per year. The average is 15 surveys per reporting SWA per year. On average 20 employers respond to each survey. It is estimated that it takes employers 30 minutes to fill out and return the written survey. The total burden is 4,500 reporting hours (15 surveys x 30 SWAs x 20 employers x 30 minutes = 4,500 hours). The total annual cost of collecting information (\$139,905) is based on the average hourly rate of \$31.09 for Farm, Ranch, and Other Agricultural Managers published by the Bureau of Labor Statistics in O\*Net Online at <http://www.onetonline.org/link/summary/11-9013.02>.

It is also estimated that it takes SWA staff 30 minutes after each survey to tally the results and either retain them for future use or forward them to the Chicago NPC. The total burden is 225 reporting hours (15 surveys x 30 SWAs x 30 minutes = 225 hours). The total annual cost of collecting information (\$4,343) is based on the average hourly rate of \$19.30 for survey researchers based on the median national wage as published by the Bureau of Labor Statistics in O\*Net Online at <http://www.onetonline.org/link/summary/19-3022.00>.

(4). Ad hoc employment practice surveys: Ad hoc employment practice surveys are conducted by the SWAs at the request of the Chicago NPC. On average, the Chicago NPC requests approximately 100 such surveys per year from various SWAs. Of those 100 requests, only half require 10 or more employers to reply, in which case 20 employers are surveyed. The surveys are usually conducted telephonically; therefore, both the employer and SWA staff are burdened, and the average time is 30 minutes per employer. The total burden is 1,000 reporting hours (50 surveys x 20 employers x 30 minutes = 500 hours, plus 50 surveys x 20 SWAs x 30 minutes = 500 hours, for a total of 1,000 hours). The total annual cost of collecting information for the employer (\$15,545) is based on the average hourly rate of \$31.09 for Farm, Ranch, and Other Agricultural Managers published by the Bureau of Labor Statistics in O\*Net Online at <http://www.onetonline.org/link/summary/11-9013.02>, and the total annual cost of collecting information by the SWA from the employer (\$9,650) is based on the average hourly rate of \$19.30 for survey researchers based on the median national wage as published by the Bureau of Labor Statistics in O\*Net Online at <http://www.onetonline.org/link/summary/19-3022.00>.

It is estimated that it then takes SWA staff 30 minutes to tally the responses and write an email to the Chicago NPC with the results of the surveys, for a total burden of 25 reporting hours (50 surveys x 30 minutes ÷ 60 = 25 hours). The total annual cost of collecting information (\$483) is based on the average hourly rate of \$19.30 for survey researchers based on the median national wage as published by the Bureau of Labor Statistics in O\*Net Online at <http://www.onetonline.org/link/summary/19-3022.00>.

Report Item	Number of Respondents	Responses Per Year	Total Responses	Hours Per Response	Annual Burden Hours	Annual Cost
ETA Form 232A	14,608	1	14,608	.25	3,652	\$113,541
ETA Form 232	54	11	600	11	6,600	\$127,380
Prevailing Practice Employer	9,000	1	9,000	.5	4,500	\$139,905
Prevailing Practice SWA	30	15	450	.5	225	\$4,343
Ad hoc Employer	1,000	1	1,000	.5	500	\$15,545
Ad hoc SWA	20	50	1,000	.5	500	\$9,650
Ad hoc SWA to OFLC	50	1	50	.5	25	\$483
TOTALS	24,762 <sup>1</sup>	***80	26,708	***	16,002	\$410,847

### *A.13 Estimated Cost to Respondents*

- a) Start-up/capital costs: There are no start-up costs.
- b) Annual costs: There are no annual costs involved with operation and maintenance because ETA will be responsible for the annual maintenance costs for the free downloadable forms.

### *A.14 Estimates of Annualized Costs to Federal Government*

The hourly rate used to calculate cost is the average hourly rate for an employee in the Federal service (based on 2012 GS locality pay schedules for Chicago, Illinois for the National Processing Center or Washington, DC for the OFLC National Office - <http://archive.opm.gov/oca/12tables/indexGS.asp>).

#### (1) Prevailing Wage Surveys (ETA Form 232) Analysis:

ETA will continue to collect and maintain all aggregate reports through the OFLC. It is estimated that the OFLC and National Processing Center (NPC) staff spend the following time each year reviewing state wage reports, updating the Agricultural On-Line Wage Library, and using wage results in processing H-2A temporary labor certification applications.

<sup>1</sup> There are only 54 SWAs performing these surveys; therefore, this calculation assumes that different employers are being contacted, but the same 54 SWAs are doing the interviewing, so that 24,608 employers respond plus 54 SWAs totaling 24,762 respondents.

GS-Level/Step	Total Staff	Hourly Rate	FLFTE <sup>2</sup>	Total Hours	Total Cost
OFLC Staff: GS-15/1	1	\$59.30	1.69	100	\$10,022
	GS-14/1	1	\$50.41	200	\$17,039
	GS-13/1	1	\$42.66	720	\$51,909
NPC Staff:GS-12/1	4	\$36.13	1.69	1,200 <sup>3</sup>	\$73,272

(2) Prevailing Practice Survey Analysis:  
15 surveys x 30 SWAs = 450 prevailing practice reports received

Analyst Compilation and Review: = 1 hour

Estimated Cost

Staff (GS 12, Step 5 x 1.69 FTE)  
\$40.95 x 1.69 x 450 x 1 hour] = \$31,143

(3) Ad hoc surveys

50 surveys

Analyst Review = 15 minutes

Estimated Cost

Staff (GS 12, Step 5 x 1.69 FLFTE)  
\$40.95 x 1.69 x 50 x .25 hour] = \$865

**Total Cost:**

<b>Prevailing Wage</b>	<b>\$152,242</b>
<b>Prevailing Practice</b>	<b>\$31,143</b>
<b>Ad hoc</b>	<b>\$865</b>
	<b>=====</b>
<b>Total</b>	<b>\$184,250</b>

*A.15 Changes in Burden*

The per response amount of burden on employers, SWAs, and the Federal Government is not affected by the Department's proposed changes to the ETA Form 232 or ETA

<sup>2</sup> The average Federal Government cost for a year of operation, where salaries are involved, is estimated on an hourly basis multiplied by an index of 1.69 to account for employee benefits and proportional operating costs, otherwise known as Fully Loaded Full Time Equivalent (FLFTE). The index is derived by using the Bureau of Labor Statistics' index for salary plus benefits and the Department's internal analysis of overhead costs averaged over all employees of OFLC.

<sup>3</sup> This figure reflects the cumulative time spent by four NPC staff members. Each staff member spends approximately 300 hours each year reviewing state wage reports, updating the Agricultural On-Line Wage Library, and using wage results in processing H-2A temporary labor certification applications.

Form 232A or the proposal to change the OMB Control Number for employment practice surveys. These changes reorganize the information the Department is already collecting. However, the Department has seen a decrease in the number of surveys performed by the SWAs over the years; therefore, the number of responses for the ETA Form 232A has decreased by 24,197 from 38,805 to 14,608.

The burden of determining prevailing practices is being shifted to this ICR. The burden information for these prevailing practice determinations is currently accounted for in OMB Control Number 1205-0457, in which the SWAs report their overall activities to ETA for grant making purposes. However, the work required to determine the prevailing practice in an area of employment more logically fits in with determining the prevailing wages in an area of employment. Therefore, the Department is now moving the burden of collecting prevailing practice information from OMB Control Number 1205-0457 to OMB Control Number 1205-0017. This will add additional responses to this ICR of 11,500 and additional burden hours of 5,750 burden hours. However, due to the decrease in ETA Form 232A surveys discussed above, the overall responses are decreasing by 12,697 and the hourly burden is decreasing by 299.

*A.16 Publication of Results*

<b>Product</b>	<b>Submission Date</b>	<b>Publishing Date</b>
<b>Wage Survey Results (aggregate)</b>	On-going through the calendar year	Published throughout the year on the Agricultural On-Line Wage Library at <a href="http://www.foreignlaborcert.doleta.gov/aowl.cfm">http://www.foreignlaborcert.doleta.gov/aowl.cfm</a> as SWAs report aggregate data to OFLC

*A.17 Approval Not to Display OMB Expiration Date*

The expiration date for OMB approval will be displayed. We are not seeking approval to have this concealed.

*A.18 Exceptions to OMB Form 83-1*

No exceptions are requested in the “Certification of Paperwork Reduction Act Submissions.”

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

This data collection does not employ any statistical methods.