

**Supporting Statement for Paperwork Reduction Act Submissions
U.S. Department of Labor Events Management Platform**

This Information Collection Request (ICR) is being submitted to transform the Vendor Outreach Session Information Management System used by the Department of Labor (DOL), Office of the Assistant Secretary for Administration and Management (OASAM), Office of Small and Disadvantaged Business Utilization (OSDBU) into a Department of Labor Events Management Platform (DOLEMP) used to obtain registration information for all DOL events. As specific information is likely to change from event to event, the ICR will be a generic one; however, the Department seeks approval not to send individual events that are limited to the general list of questions included on the “Registration Fields” (i.e., elements could be dropped but not added). Registration elements for specific events requiring additional information would be submitted for approval pursuant to this generic ICR. For example, this ICR seeks to continue the Vendor Outreach Session collection as an event that asks for additional information.

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

The DOL periodically sponsors events that require advance registration by persons wishing to attend. This ICR seeks PRA clearance for the DOLEMP. This information will help ensure that attendees receive suitable accommodations (e.g., a large enough room with enough seating) while attending the DOL event. In addition, the information will help the DOL keep track of the types of entities that attend agency events. Such information can assist when developing lists of stakeholders.

In addition, the OSDBU administers DOL responsibilities to ensure procurement opportunities for small, small disadvantaged, women-owned, HubZone, and small disadvantaged veteran-owned small businesses, and serves as the Department’s central referral point for small business regulatory compliance information and questions. The Vendor Outreach Session Registration Form (VOS) will be an information collection component of the larger DOLEMP.

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

available to small businesses compliance guides and assistance on the implementation of regulations and directives of enforcement laws they administer.

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

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

DOL program agencies will use the DOLEMP information to register participants at DOL events. The collection method, i.e., voluntary on-line registration, remains unchanged from the VOS.

The VOS component gathers and manages information for two OSDBU constituent groups: small businesses and trade associations as well as other key populations associated with the small business community. Via this platform, the constituent groups have the opportunity voluntarily to provide to the OSDBU information about their organizations. The information is used by OSDBU and DOL agencies to maximize communication with the respective constituent groups regarding relevant OSDBU and DOL programs, initiatives, procurement opportunities and compliance assistance; to track services and solicit feedback on customer service to group members; to facilitate registration of group members participating in OSDBU-sponsored activities; and, for security purposes, to facilitate tracking of attendees at Vendor Outreach Sessions (VOS) – outreach events that are held on U.S. Government property.

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

In compliance with the Government Paperwork Elimination Act, information for the DOLEMP is collected via an electronic Web site. Registrants are able to visit the Web site and voluntarily complete an automated registration form. The advantages of using an on-line Web site are easy access by respondents, uniform collection of data to facilitate comparison and analysis; more manageable (paperless) method for retaining and retrieving constituent data; and accessibility for OSDBU and DOL procurement officials.

4. Describe efforts to identify duplication.

DOLEMP is used to obtain registration information for DOL events. This information is not available from any other source.

The VOS portion of the DOLEMP is similar to the government-wide System for Award Management (SAM), which is managed by the General Services Administration's Integrated Award Environment. However, the DOLEMP is designed to gather information (such as small business certifications and contact information) on vendors interested in doing business with the DOL. The DOL is not aware of any systems that provide communication with key constituent groups that pertain to DOL's acquisition opportunities and initiatives other than the VOS.

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

Many of the respondents to this information collection will be small entities. To limit the burden, this information will be collected via automated Web based forms. However, this information collection does not have a significant economic impact on small entities.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

A respondent enters information in only once per event. If the information is not collected, persons will have no way of registering for DOL events, hurting DOL outreach and compliance assistance efforts. In addition, the effectiveness of the OSDBU to serve the two identified constituency groups will be adversely affected. An earlier manual system to collect VOS information proved to be a labor intensive, time-consuming process that produced incomplete, inaccurate results. Allowing respondents an opportunity to enter their own information helps to ensure that the information gathered is more accurate and timely.

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

No special circumstances have been identified for this system.

8. If applicable, provide a copy and identify the data and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe

actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

In accordance with 5 CFR 1320.8(d), the Department published a 60-day pre-clearance notice in the *Federal Register* on June 6, 2014 (79 FR 32751) inviting interested parties to comment on this information collection. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to respondents.

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

No express assurance of confidentiality is provided, as DOL meetings are public; however, DOL would only release information after redacting information in accordance with the Freedom of Information Act. For example, personal identifying information could be construed as being exempt from disclosure and withheld as constituting an unreasonable invasion of personal privacy. Where a list of attendees will be made available, the DOLEMP can include a checkbox allowing a registrant have his or her name withheld from the list.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a**

sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

The Department notes that most DOL events do not require information in excess of basic self-identifying information meeting the exception to the definition of “information” codified in regulation 5 CFR 1320.3(h)(1). The DOL claims no burden for such responses.

For purposes of this ICR, the DOL assumes 1,200 persons will register for some event that asks for PRA covered information in order to attend. This information is generally readily available and does not require extensive research. Based on a trial run of three DOL employees who are unfamiliar with the information collection, the DOL estimates each response will require no more than 5 minutes to complete. The DOL also assumes approximately 700 responses will come from the private sector; 300 from State, Local, and Tribal Governments; and 200 from individuals.

1,200 responses x 5 minutes = 100 hours.

For database entry purposes, the DOL assumes about 90 percent of events cleared under this ICR will not require an additional submission to the OMB, because the events will not request information beyond the basic template. The DOL has entered three information collections (Events Management Platform Data Fields—Private Sector, Events Management Platform Data Fields—State, Local, and Tribal Governments, and Events Management Platform Data Fields—Individuals or Households) into the database to cover this burden.

The original VOS hour burden was based on a pilot test of five small businesses conducted during the planning stages of the original VOS and included time to research and retrieve information. In the pilot, an average of seven (7) minutes was required to complete the registration information and an average of two (2) minutes was required to

update the information. The DOLEMP VOS works in the same way, and the burden is assumed not to have changed.

The number of VOS respondents (1,000) and the number of VOS responses (2,000) differ because it is likely that some respondents will update their registration information more than once per year. For purposes of this ICR, DOL assumes all respondents will update their information once

Registration for Small Businesses and Trade Associations:

1,000 initial responses	x 7 minutes	= 117 hours	
1,000 update responses	x 2 minutes	= 33 hours	
Total VOS Hours			= 150 hours

Total burden hours: 100 generic event registration hours + 150 VOS hours = 250 total hours.

Registrants can come from a variety of backgrounds; however, given the types of events likely requiring a PRA covered response the DOL believes a significant portion will be in management, professional, or related fields. The value of respondent time has been calculated accordingly.

The value of the total annual burden hours to respondents or record keepers is anticipated to be \$13,060. The DOL calculated this estimate by multiplying 250 hours with the 2014 employer cost per hour worked for employee compensation for civilian employees working in management, professional, and related occupations of \$52.24. See *National Compensation Survey—Employer Costs for Employee Compensation Historical Listing March 2004—March 2014*, at 8, Table 1, U. S. Department of Labor, Bureau of Labor Statistics, June 11, 2014, <http://www.bls.gov/ncs/ect/sp/ececqrtn.pdf>. Last accessed August 15, 2014. 250 hours x \$52.24 = \$13,060.

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items A.12 and A.14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the**

discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

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

- 14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items A.12, A.13, and A.14 in a single table.**

For purposes of this submission, the DOL assumes in-house staff at grade level GS-13, step 4 in Washington, DC manage the application, and that the level of effort requires 200 hours a year. The hourly rate is \$47.40. See Office of Personnel Management, Salary Table 2014-DCB, <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/salhl.pdf> at 32.

System Management Costs: 200 hours x \$47.40 = \$9,480.00.

For purposes of this submission, the DOL assumes that, on average, staff at grade level GS-7, step 4 in will spend 15 minutes to create an event in the system. An additional 45 minutes per event is expected to be spent processing responses, the average grade

expected to be the same. Total event processing time, thus, is expected to be one hour per event. Events can be held anywhere in the country; therefore, the hourly rate is \$20.65. See Office of Personnel Management, Salary Table 2014-RUS, <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/salhrl.pdf> at 33. The DOL also assumes each event will have an average of 25 attendees; thus, based on expecting 1,200 responses, the DOL estimates registrations will be sought for 48 events per year.

Per Event Cost: 1 hour x 48 events x \$20.65 = \$991.20.

Total Federal costs are estimated to be \$10,471 (\$9,480 + \$991).

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

The VOS Information Management System used by the DOL-OASAM-OSDBU is being transformed into a DOLEMP used to obtain registration information for all DOL events. The DOL estimates that this will increase the DOL information collection budget by 1,200 responses (2,000 to 3,200) and 100 hours (from 150 to 250).

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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

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

The expiration date for OMB approval will be displayed on the Web site forms.

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

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.