

**SUPPORTING STATEMENT FOR THE
COLLECTION OF INFORMATION REQUIREMENTS FOR
THE VOLUNTARY PROTECTION PROGRAMS (VPP)
OFFICE OF MANAGEMENT AND BUDGET
(OMB) CONTROL NO. 1218-0239 (September 2014)**

A. JUSTIFICATION

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

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

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

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

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

Participation in VPP is strictly voluntary, and does not diminish existing employer and employee rights and responsibilities under the Occupational Safety and Health Act (OSH Act). In particular, OSHA does not intend to increase the liability of any party in an approved VPP site. Employees or any representatives of employees taking part in an OSHA-approved VPP safety and health management programs are not assuming the employer's statutory or common law responsibilities for providing safe and healthful workplaces, or undertaking in any way to guarantee a safe and healthful work environment.

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

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

Site-Based

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

VPP Corporate

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

the VPP Corporate program has dwindled. OSHA is reviewing the practical utility of this program.

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

OSHA Challenge

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

Special Government Employee (SGE) Program

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

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

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

Site-Based and Mobile Workforce

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

VPP Corporate

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

OSHA Challenge

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

SGE Program

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

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

OSHA welcomes the electronic submission of VPP documents, where such technology is available.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

The VPP application and annual self-evaluation is applicant/participant specific, and are not requested or collected by OSHA in any other circumstances. In instances where OSHA regulations require employers to maintain written programs, this information may be used to satisfy VPP application requirements. The SGE application is applicant-specific, and is not requested or collected by OSHA under any other circumstances.

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

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

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

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

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

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

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No special circumstances exist that require employers to collect information in the manner or using the procedures specified by this item. The information collection requirements are consistent with the guidelines provided in 5 CFR 1320.5.

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

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years, even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As required by the Paperwork Reduction Act of 1995 (PRA-95) (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the *Federal Register* on June 30, 2014 (79 FR 36834) soliciting public comments on its proposal to extend OMB's approval of the collection of information requirements contained in the Voluntary Protection Programs (VPP) (OSHA Docket Number OSHA-2011-0056). This notice was part of a preclearance consultation program that provided the general public and government agencies with an opportunity to comment on OSHA's request for an extension by OMB of a previous approval of the collection of information requirements found in the VPP. In response to the comment Notice, the Agency received one comment from Ms. Megan Hallmark; Private Citizen) (Docket ID: OSHA-2011-0056-0011).

OSHA appreciates the time the Ms. Hallmark took to respond to OSHA's notice requesting public comment. Ms. Hallmark concurs with OSHA that the VPP is an important program that improves worker's health and safety in the workplace. She also states that the current VPP collection of information requirements are "necessary and useful." She stresses that these

collection of information requirements provide integrity to the program. Ms. Hallmark comments:

In order to maintain the integrity of the program by ensuring that only sites that fully meet the criteria and are committed to going above and beyond the regulations to ensure their employees are working in a safe and healthy environment, all of this information must be collected and reviewed. Without this integrity, this program will lose the credibility and respect that it has earned over the years. Sites that achieved OSHA VPP Star status have a reputation that they are the best when it comes to safety and health. They are considered leaders in their industry. If OSHA does not gather correct information regarding safety and health programs, injury data, etc., there is no way to guarantee the program will maintain the high standard of excellence.

Ms. Hallmark believes there are positives and negatives for removing the requirement that Challenge sites submit quarterly reports to OSHA.

OSHA agrees that the system suggested would streamline data collection and provide benefits to both VPP or Challenge participants and the agency. The agency routinely assesses its data collection and submission processes and considers opportunities for improvement, including options for increasing electronic reporting. OSHA included electronic reporting as an alternative for employers required to report under OSHA's recent revision to 29 CFR 1904, issued by OSHA on September 11, 2014. OSHA will continue its effort to develop efficient and seamless processes to address data collection agency-wide and will consider your comments and suggestions for improving data submittal processes for its cooperative programs.

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

The Agency will not provide payments or gifts to the respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis of the assurance in statute, regulation, or agency policy.

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

Participants applying for the VPP understand that, if approved to participate into these programs, their application becomes part of the public record. SGEs understand that, if approved to the program, they will be considered active SGEs and may be requested to participate on VPP onsite evaluations. Information collected in the application concerning financial disclosures remains confidential and are not available to the public.

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

The information collection requirements do not involve the collection of sensitive information.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collection of information, identifying and using appropriate wage rate categories.**

Wage Rates: The Agency adopted the mean wage rates from *Occupational Employment Statistics, May 2012 National Industry-Specific Occupational Employment and Wage Estimator*: Total compensation for these occupational categories includes an adjustment of 29.9 percent (*Employer Costs for Employee Compensation Summary, March 2014*) for fringe benefits; this figure represents the average level of fringe benefits in the private sector. The costs of labor used in this analysis are; therefore, estimates of total hourly compensation. The hourly wage is:

- First-Line Supervisor/Manager of Production and Operating Workers (51-1011): \$36.32

The following table summarizes the burden hours and costs associated with each provision of the Standard that contains a paperwork requirement:

**Annual Effect of VPP Information Collection
On the Private Sector**

Collection of Information	Estimated Number of Responses (3-year average)	Frequency of Response	Estimated Annual Burden-Hours per Respondent	Estimated Annual Burden-Hours
VPP				
<u>VPP Application Types</u>	300	1 time	200	60,000
Site Based Mobile Workforce Corporate				
VPP Application PSM Supplement A	75 (25 %) of VPP Applications	1 time	40	3,000

VPP Annual Self-Evaluation	1,700	1 per year	20	34,000
<u>VPP Participation Evaluation Report</u> Site Based Mobile Workforce Corporate	315	per year	20	6,300
VPP PSM sites Self-Evaluation Supplement B	425 (25 %) of VPP Annual Self-Evaluation	1 per year	20	8,500
VPP PSM Sites Supplemental Questions Supplement C	100 on-sites PSM	PSM participants once every 3 to 5 years	20	2,000
OSHA Challenge				
Challenge Administrators Application	5	1 time	5	25
Challenge Candidate Application	30	1 time	10	300
OSHA Challenge – Tracking Participant Status Report (OCTPS)	200	Quarterly	8	6,400
OSHA Challenge – Tracking Participant Status Report (OCTPS) – Administrator Administration	200	Quarterly	12	9,600
Annual Summary Report Form	200	1 time per year	20	4,000
Special Government Employee				
SGE Eligibility	900	1 every 3 years	10 minutes (.167 hour)	50
Resume	900	1 every 3 years	30 minutes (.5 hour)	150
Confidential Financial Disclosure Form (OGE Form 450)	300	Annually	30 minutes (.5 hour)	150
Total	5,650			134,475

Cost: 134,475 hours x \$36.32 = \$4,884,132

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

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software, monitoring, sampling, drilling and testing equipment, and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve a regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.**

The cost determined under Item 12 accounts for the total annual cost burden to respondents or record keepers resulting from these collections of information requirements.

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

The information collection estimates contained in the table below are based on programmatic expertise and experience of federal personnel, an average cost estimate of \$50.27¹ per hour of government personnel time (GS-13, Step 6), and best professional judgment.

Effects of VPP Information Collection

On the Federal Government

Information Collection	Estimated	Frequency of	Federal Government	Total
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¹ Source: U.S. Office of Personnel Management, 2014 General Schedule (GS) Locality Pay Tables,

	Number of Responses (3-year average)	Response	Review Time per Document	Estimated Hours
VPP				
VPP Application	300	1 time	5 hours - GS-13	1,500
VPP Application Supplemental /PSM Questionnaire - A	75 (25%) of VPP Applications	1 time	4 hours - GS-13	300
VPP Annual Self-Evaluation	1,700	1 per year	2 hours - GS-13	3,400
<u>VPP Participation Evaluation Report</u> Site Based Mobile Workforce Corporate	315		15 hours for each member of a four member team – GS-13 (see Footnote ²)	189,000
PSM Evaluation/Supplement-B	425 (25%) of VPP Annual Evaluation	1 per year	2 hours - GS-13	850
PSM Supplemental Questions Supplement C	100 on- sites	Once every three to five years	2 hours –GS-13	200
OSHA Challenge				
Challenge Administrators Application	5	1 time	5 hours - GS – 13	25
Challenge Candidate Application	30	1 time	5 hours - GS – 13	150
OSHA Challenge – Tracking Participant Status Report (OCTPS)	200	Quarterly	2 hours GS-13	1,600
Annual Summary Report Form	200	1 time	2 hours - GS – 13	400
Special Government Employee				
General Eligibility Information Sheet	300	1 every 3 years	10 minutes (.167 hour) GS-13	50
Resume	300	1 every 3 years	10 minutes (.167 hour) GS-13	50
Confidential Financial Disclosure Form (OGE-	300	Annually	10 minutes (.167 hour) GS-13	50

2 The VPP evaluation team varies in size depending upon the site being evaluated. The amount of time per team member per site also varies depending on the responsibility of the team member. Based upon discussions with staff these estimates seem reasonable, but may error on being overly burdensome. In addition, as not all team members will spend 20 hours; those unspent hours are then accounted for any additional analysis conducted by the Federal government.

Form 450)			
Total			27,475.3

Federal Cost: 27,475 hours x \$50.27= \$1,381,168.

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

OSHA is requesting that the burden hours for this ICR be increased by 19,116 hours, from 115,359 to 134,475 hours. The *Rationale for Requested Burden Hours* table below explains the rationale for the burden hour increase to the ICR.

In order to be more transparent, rather than having one VPP listing, OSHA disaggregated the Challenge Program’s information collections (ICs) from the VPP IC in the data base. This resulted in two new ROICIS IC entries, Challenge Participants and Challenge Administrators. The data base identifies these as new IC’s, with 0 hours in the existing inventory. However, these hours were accounted for in the previously submitted ICR under the VPP umbrella. As a result there are discrepancies in changes in burden hours between ROCIS and this supporting statement. This supporting statement calculates a total program change increase of 21,150 hours; and an adjustment decrease of -2,789; the data base defaults to a total program change increase of 14,780 and an adjustment increase of 4,336. Both accurately state an increase of 19,116 burden hours.

Rationale for Requested Burden Hour Change			
Information Collection	Current Burden Hours	Requested Burden-Hours	Rationale for Change
VPP			
<u>VPP Application Types</u> Site Based Mobile Workforce Corporate	60,000	60,000	No change.
VPP Application PSM Supplement A	3,000	3,000	No change.
VPP Annual Self-Evaluation	34,000	34,000	No change.
<u>VPP Participation Evaluation Report</u> Site Based Mobile Workforce Corporate	0	6,300	OSHA requests a program change increase of 6,300 hours . Upon further analysis, the on-site evaluation report is a collection of information requirement.
VPP PSM Sites Self Evaluation Supplement B	8,500	8,500	No change.
PSM Supplemental Questions Supplement C	-0-	2,000	OSHA requests a program change increase of 2,000 hours . Upon further analysis, Supplement C is a

			collection of information used during an on-site consultation visit to those VPP sites that are subject to OSHA's Process Safety Management Standard.
OSHA Challenge			
Challenge Administrators Application	70	25	OSHA requests an adjustment decrease of 45 hours . OSHA receives approximately 5 requests per year to be a challenge administrator not 14 (the total number of Challenge administrators).
Challenge Candidate Application	2,100	300	OSHA requests an adjustment decrease of 1,800 hours . OSHA receives approximately 30 requests per year to be a challenge candidate not 210 (the total number of Challenge candidates).
OSHA Challenge – Tracking Participant Status Report (OCTPS)	0	6,400	OSHA requests a program change increase of 6,400 hours . The increase reflects the burden the Challenge participant incurs, not just the Challenge Administrator. ROCIS states a
OSHA Challenge – Tracking Participant Status Report (OCTPS) – Administrator Administration	3,150	9,600	OSHA requests a program change increase of 6,450 hours . The increase in burden hours includes time a Challenge Administrator spends administrating the OCTPS reports to Challenge participants, and the quarterly submissions to OSHA.
Annual Summary Report Form	4,200	4,000	OSHA requests an adjustment decrease of 200 hours to reflect the decrease in the number of Challenge participants, from 210 to 200.
Special Government Employee			
SGE Eligibility	39	50	OSHA requests an adjustment increase of 11 burden hours as a result of an increase the time from 8 minutes to 10 minutes.
Resume	150	150	No change.
Confidential Financial Disclosure Form (OGE Form 450)	150	150	No change.
Total	115,359	134,475	A total program change increase of 21,150 hours; and an adjustment decrease of -2,789; for a total increase of 19,116 hours.

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

There are no plans to publish this information.

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

OSHA lists current valid control numbers in §§1910.8, 1915.8, 1917.4, 1918.4, and 1926.5 and publishes the expiration date in the Federal Register notice announcing OMB approval of the information collection requirement (see 5 CFR 1320.3(f)(3)). OSHA believes that this is the most appropriate and accurate mechanism to inform interested parties of these expiration dates.

18. Explain each exception to the certification statement.

OSHA is not seeking such an exception to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

These collections of information employ no statistical methods.