

**JUSTIFICATION FOR NON-MATERIAL CHANGE FOR THE INFORMATION
COLLECTION REQUIREMENTS OF REGULATIONS CONTAINING PROCEDURES
FOR HANDLING OF RETALIATION COMPLAINTS
OFFICE OF MANAGEMENT AND BUDGET (OMB) CONTROL NO. 1218-0236
(November 2014)**

OSHA is requesting a non-substantive change to the currently approved collection of information requirements contained in the “Regulations Containing Procedures for Handling of Retaliation Complaints” ICR to submit slight formatting and appearance changes to the electronic version of the “Notice of Whistleblower Complaint Form” to OMB. These changes do not materially change the approved information collection instrument.

As part of a revision to this ICR, OSHA submitted the “Notice of Whistleblower Complaint Form” to OMB for approval on June 18, 2013 and OMB approved the form for use on July 26, 2013. Prior to approval, the supporting documentation submitted to OMB included draft downloadable and electronic forms. The Agency realized that the final electronic form uploaded to the OSHA website contained some slight formatting and appearance changes from the drafts submitted to OMB for approval, which are described below.

1. The Agency used asterisks to denote required fields, rather than repeating a parenthetical reference after each required field.
2. Some field boxes were subdivided.
3. The Agency added notes in fields to communicate character limits.
4. Item 29 asks whether the complainant took any actions to grieve the matter, and it initially called for a box labeled yes and a box labeled no. However, the boxes were removed because it is inferred that a user who fills-in the fillable text box had a yes answer. There is now no burden associated with a no answer.
5. Because the form submission date is automatically recorded, the Agency removed the date field in Part 5, “Certification.”
6. In the “Continuation Sheet” section, the Agency changed the three column format to a single field and adjusted the language in the heading to be consistent with this change.