

SUPPORTING STATEMENT, Part A

Survey of Occupational Injuries and Illnesses

A. Justification

1. Background.

Section 24(a) of the Occupational Safety and Health Act of 1970 (the Act) requires the Secretary of Labor to develop and maintain an effective program of collection, compilation, and analysis of statistics on occupational injuries and illnesses. Section 24 also authorizes and encourages the Federal government to enlist the aid of states in developing and conducting statistical programs to meet the data needs of the states as well as its own. Sections 8(c)(1), (2), 8(g)(2), 24(a), and 24(e) of the Act specifically require the Secretary of Labor to design and implement a system requiring employers covered by the Act to maintain records of occupational injuries and illnesses and to submit periodic reports to the Secretary of Labor upon request.

In Secretary's Order No. 5-02, the Secretary of Labor delegated to the Commissioner of Labor Statistics the responsibility for "Furthering the purpose of the Occupational Safety and Health Act by developing and maintaining an effective program of collection, compilation, analysis and publication of occupational safety and health statistics."

The Bureau of Labor Statistics (BLS) fulfills this responsibility by conducting the Survey of Occupational Injuries and Illnesses in conjunction with participating state statistical agencies. The survey reflects employers' incorporation of the Occupational Safety and Health Administration (OSHA) recordkeeping regulations that were implemented by the Department of Labor.

Included in this package are the following documents used in the data collection process for the Survey of Occupational Injuries and Illnesses (SOII):

1. The survey form - BLS 9300
2. The FAX form
3. Email notification messages
4. Notification letter and associated materials to be sent to all participants in the 2017 survey
5. Informed Consent letter
6. Voluntary letter for state and local government agencies
7. Nonresponse follow-up letters for mandatory and voluntary participants
8. Forms for pilot collection of case and demographic data for injury and illness cases

2. Uses of the Survey.

The purpose of the Act, as stated in Section 2(b), is to assure, as far as possible, every working man and woman in the Nation safe and healthful working conditions. The BLS SOII provides the Nation's primary indicator of the progress towards achieving this goal. BLS is the principal Federal agency responsible for measuring labor market activity, working conditions, and price changes in the economy. Its mission is to collect, analyze, and disseminate essential economic information to support public and private decision-making. As an independent statistical agency, BLS serves its diverse user communities by providing products and services that are objective, timely, accurate, and relevant. SOII's mission is to produce the estimates necessary for the safety and health community to save lives and reduce workplace injuries and illnesses. To that end, the survey measures the overall rate of occurrence of work injuries and illnesses by industry; and for the most serious cases by occupation, worker characteristics, and case circumstance.

In 2016 OSHA issued a final rule to 'Improve Tracking of Workplace Injuries and Illnesses' (29 CFR Parts 1904 and 1952). This rule will result in OSHA and BLS collecting identical data elements in 2017 for a subset of establishments.

OSHA has indicated it intends to disseminate the data submitted to it. The data submitted to BLS are protected from disclosure by the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA) and cover a broader scope of the workforce. BLS will continue to collect, review, estimate, and validate SOII data collected to produce estimates with accompanying measures of reliability that meet BLS standards. Additional information about this OSHA rule and efforts to reduce duplicative reporting can be found in Section 4.

Survey estimates are used by a wide range of stakeholders to assess the Nation's progress in improving the safety and health of America's work places; to prioritize scarce Federal and state resources; to guide the development of injury and illness prevention strategies; and to support OSHA and state safety and health standards and research. These stakeholders include OSHA, the National Institute for Occupational Safety and Health (NIOSH), Congress, public policy analysts, state public health officials, safety and health advocates, researchers, and the media. Data are essential for evaluating the effectiveness of Federal and state programs for improving work place safety and health. For these reasons, it is necessary to provide estimates separately for participating states.

The SOII program is vital to the safety of America's workers. Without these necessary estimates, the safety and health community would be less able to focus on enforcement efforts, research prevention practices, and put in place mitigating strategies which lead to fewer occupational fatalities, injuries, and illnesses.

The Bureau of Economic Analysis uses the BLS injury and illness survey data to prepare the economic accounts of the United States. The survey information is used to estimate employer contributions for workers' compensation by industry. The workers' compensation contributions are a component of the employer contributions for social insurance and other labor income in the national income and product account.

NIOSH and the Council of State and Territorial Epidemiologists (CSTE) identified twenty-two occupational health indicators intended to improve the surveillance of workplace injuries and illnesses by state health agencies. Each health indicator is comprised of one or more frequency measures. The BLS SOII contributes three frequency measures to these health indicators.

The industry classifications for which data are produced reflect the incorporation of the North American Industry Classification System (NAICS) codes beginning with reference year 2003.

Beginning with survey year 2008, the SOII published national estimates of workplace injuries and illnesses sustained by state and local government workers, including those in such relatively high hazard and high profile occupations as police, firefighters, paramedics, and other public health workers. The BLS collects data from state and local government agencies in all states to support both state and national estimates. The BLS regards the collection of these data as a significant expansion in its overall coverage of the American workplace and it also provides some measure of response to critics who allege an undercount of injuries and illnesses in the survey. The BLS undertook research into the undercount by investigating the issues surrounding a potential undercount. This multiyear research effort provided results in 2012 which were used to guide the selection of further research topics in 2013 to improve the completeness and accuracy of estimates from the SOII. The BLS continues to evaluate the results of the undercount research completed, including testing the feasibility of collection of injury and illness data directly from workers.

A potential solution is to contact workers directly through a household survey. A household survey would be expected to produce estimates that are not filtered by establishment-level reporting involved in the SOII and would sample from the universe of all workers. Such a survey would produce annual calendar year estimates of occupational injuries and illnesses by employment relationship, industry, and occupation. BLS is currently working to determine the collection mode and sample design best used for this type of survey. While this research is ongoing, BLS plans to conduct a large-scale test of feasibility of collecting these data directly from workers.

The HS0II Pilot test will be a large-scale, nationally representative household pilot survey that will allow BLS to test the collection information over one calendar year and also to produce broad industry and occupation estimates comparable to the SOII. These tests continue BLS research into ways to improve completeness of occupational injury and illness measures.

The purpose of the HS0II will be to estimate the burden of occupational injuries and illnesses in the U.S. This pilot data collection effort will determine if a household survey can accurately, and without bias, estimate the true burden of occupational injuries and illnesses. The HS0II will also test the feasibility of collecting these data from workers directly. Occupational injuries and illnesses are relatively rare events, the topic may be perceived as sensitive, and the concepts may not be well understood.

A private contractor will conduct the HS0II Pilot Test for the Bureau of Labor Statistics (BLS) in support of the Compensation and Working Conditions program.

For the more serious injuries and illnesses, those with days away from work, the SOII provides detailed information on the injured/ill worker (age, sex, race, industry, occupation, and length of service), the time in shift, and the circumstances of the injuries and illnesses classified by standardized codes (nature of the injury/illness, part of body affected, primary and secondary sources of the injury/illness, and the event or exposure that produced the injury/illness). Race data categories reflect the Office of Management and Budget (OMB) recommended categories for non-self-reported classification. Optional information on the general job category is used to improve coding for non-descriptive job titles, such as "Customer Service Representative." A check-off for before/during/after work shift was included to identify the events that occurred before or after the work shift.

In the two decades prior to the OSHA recordkeeping changes in 2002, incidence rates for cases with days away from work decreased significantly while incidence rates for cases with only restricted work activity increased significantly. Since the BLS previously only collected case and demographic data only for cases with days away from work, data were not obtained about a growing class of injury and illness cases.

Beginning with the 2011 survey year, BLS began testing the collection of case and demographic data for injury and illness cases that require only days of job transfer or restriction. The purpose of this on-going pilot study is to evaluate collection of these cases and to learn more about occupational injuries and illnesses that resulted in days of job transfer or work restriction.

For survey year 2016, case circumstance and worker characteristic data for days of job transfer or work restriction cases will be collected for the following six NAICS* industry subsectors:

Beverage and tobacco product manufacturing (NAICS 312)
General merchandise stores (NAICS 452)
Couriers and messengers (NAICS 492)
Waste management and remediation services (NAICS 562)
Hospitals (NAICS 622)
Accommodation (NAICS 721)

BLS is analyzing the results of this test to determine the value of the resulting information and is looking at how best to implement the collection of these data as well as days away from work cases in future survey years. BLS regards the collection of these cases with only job transfer or restriction as significant in its coverage of the American workforce. Industry subsectors were selected based on their days-of-job transfer-or-restriction incidence rate (and to some degree the number of cases) in years before the pilot study. Some industries were selected if the days-of-job transfer-or-restriction incidence rate was greater than or equal to the days-away-from-work incidence rate in the respective industry.

To retain the level of case and demographic characteristics estimates published currently for cases with days away from work and publish similar estimates for cases with job transfer or restriction, a greater number of cases will need to be collected from employers. BLS has maintained the subsampling process for employers to limit to 15 the number of cases each employer needs to submit. BLS is continuing to examine this issue to determine an optimal number of cases to collect for each type of case while limiting the burden on the employer and the burden on the participating state agencies.

Employers covered under the Act are in one of two categories:
(1) Employers who maintain OSHA records on a regular basis; and
(2) employers who are normally exempt from OSHA recordkeeping. Each year a sample of exempt employers is required to keep records and participate in the SOII. In December, prior to the survey reference year, sampled employers who are normally exempt from recordkeeping will be notified by the BLS or participating state agencies to record their injuries and illnesses on the OSHA recordkeeping forms, which will be provided by the BLS. The BLS will also provide a courtesy copy of the required OSHA recordkeeping forms to all other survey participants for that reference year.

3. Use of technology to reduce employer burden.

The survey's sample selection process employs stratified random sampling to reduce the burden on private sector establishments. The BLS Internet data collection facility (IDCF) system was first introduced for the SOII in 2003, and is currently being used for the 2015 survey. The BLS also offered an email option to the employers for the first time in the 2004 survey year. The occupational safety and health statistical program also has used improved information technology, such as cognitive research, in efforts to reduce employer burden. Employers with large numbers of injuries and illnesses involving days away from work are asked to submit information on a probability sample of those cases. The IDCF permits incorporation of sampling for those respondents predicted to have more than 15 cases. These respondents will be instructed to select a sample of cases occurring in a pre-specified time period. Starting with the test during the 2011 survey, with the additional collection of cases with only job transfer or restriction, this subsampling of cases continued to result in employers only having to submit 15 cases or less.

Beginning with the 2008 survey year, BLS sent the electronic data option collection form to all employers, except those in Puerto Rico who receive the Spanish language collection booklet. The initial tests encouraging the use of electronic data submission were conducted in the 2005 and 2006 survey years and were very successful which led to further utilization of electronic collection options. The number of responses via the Internet rose from 29,551 establishments in the 2004 survey year to 124,088 in the 2008 survey year (all establishments had the option to respond electronically in 2008). Between these survey years, the number of cases collected by the IDCF rose from 50,707 days away from work cases to 174,125 cases. As of May 2, 2016, 139,252 establishments have responded via the IDCF and have submitted 224,687 cases.

Employers will still have the option of requesting the hard copy version of the data collection form or the data collection FAX form.

Employers still may attach a copy of their OSHA 300A summary form to complete Part I of the survey when submitting the hard copy version of the data collection form. In addition, they will continue to be offered the option of attaching an alternative record that contains the requested worker and case circumstances information on the data collection case form. Alternative forms could be workers' compensation first report of injury forms, company accident reports, insurance forms, or the OSHA supplemental case form.

The survey allows respondents to opt in to receive notification of the requirement to respond by email. The respondent must make a positive selection to opt in; this selection will be retained. The survey will email these respondents in subsequent years if the respondent is selected to participate in the survey. The

email is pre-filled from the registration email but the respondent can change the email address at this time if desired. The survey will use email notification for notification of responsibility to participate in the survey as well as for data collection in accordance with BLS policy on the use of email for data collection.

4. Efforts to identify duplication.

As nearly all employers in the private sector are covered by the Occupational Safety and Health Act, the SOII is able by itself to produce statistics for almost all industries. However, to provide comprehensive, private sector estimates, it is necessary to secure data from other Federal agencies having statutory authority affecting the safety and health of employees in coal, metal, and other nonmetal mining, and on railroads. Comparable data are provided by the Mine Safety and Health Administration, U.S. Department of Labor, for mining employers and by the Federal Railroad Administration, U.S. Department of Transportation, for railroad employers.

OSHA requires large establishments in manufacturing and from selected high-risk industries outside of manufacturing to record on paper logs and retain data similar to those collected by the SOII. OSHA requires establishment specific data to target interventions such as inspections, consultations, and technical assistance.

The BLS collects information from OSHA logs from a sample of establishments representative of the entire U.S. economy, including establishments that maintain OSHA records on a regular basis (non-exempt) as well as establishments that are normally exempt from OSHA recordkeeping. The burden of recording information on the OSHA logs for those employers who normally must keep records is already reflected in OSHA's clearance (please see section 12 for additional detail on SOII burden for OSHA exempt and non-exempt establishments).

OSHA has amended its recordkeeping regulations to require employers in selected industries to submit electronically certain injury and illness information employers are already required to keep under OSHA's regulations. The rule does not add to or change any employer's obligation to complete and retain injury and illness records under OSHA's regulations for recording and reporting occupational injuries and illnesses, but modifies employers' obligations to transmit information from these records to OSHA or OSHA's designee. The new rule does not change any employer's obligation to complete the SOII. Some establishments in private industry are required to report to both the SOII and OSHA under the proposed rule. BLS has formed a working group with OSHA to examine ways to reduce duplicative burden where possible. This work group is tasked with assessing data quality, including the timeliness and accuracy of the OSHA collected data,

as well as align the collection with the SOII. A key goal in this process is to determine how to use OSHA collected data without adversely impacting the accuracy or timeliness of SOII estimates.

BLS faces challenges in using the OSHA-collected electronic injury and illness data as an input to SOII estimates. The OSHA rule and therefore the data collected electronically by that rule will cover only a subset of the US economy, necessitating the development of new methodologies to use the OSHA electronic data along with the SOII reported data to produce nationally representative estimates, while protecting the confidentiality of the SOII sampled establishments as required by CIPSEA. Also, measuring nonresponse is critical to creating accurate and reliable estimates and to measure accuracy but there is no known way to do so using OSHA electronic data alone without knowledge of the universe.

Additional challenges to using OSHA collected electronic data are unknown until records are submitted and reviewed (Summary records from the OSHA 300A form will be available for the first time in January 2017; case-specific data from the OSHA form 301 will be available for the first time in July 2018). These unknown issues include the robustness of the response rate, the quality or the completeness of the submitted data, and if the submissions are provided at an establishment level or at a firm level. It is important to BLS that the identities of establishment are verified and that the record for each submitted establishment include the Employer Identification Number (EIN). The EIN is a critical element to matching the records that OSHA will collect to the BLS establishment frame to appropriately incorporate these records into BLS estimates without creating bias. Without the EIN, the match becomes more complex, which can result in bias and loss of efficiency in estimates. Depending on the quality of submissions, there may be a significant impact on the ability to publish the SOII estimates by state or individual industries, which are a critical part of enforcement and research efforts. If the response to OSHA electronic collection is low or the quality of the submissions is poor, bias may preclude the use of the OSHA collected data as an input to SOII estimates. If the response rate and quality of the data are determined to be sufficient, methodologies to create estimates (including estimates of variance) from the data will need to be developed and tested. BLS will then build systems to conduct sampling, estimation, and generation of variance, among other relevant processes. The BLS injury and illness survey data are collected under a pledge of confidentiality and are used only for statistical purposes.

The work injury and illness data to be collected in the survey are not available from any other source. The only existing large body of work injury and illness information is located in

workers' compensation programs; however, many states do not include all of the specific kinds of work-related cases which the Act requires employers to record and report.

Additionally, coverage and reporting differences among states and lack of uniformly complete records prevent the workers' compensation programs from providing statistically accurate data for national estimates. Workers' compensation data also do not provide a measure of the severity of the injury or illness, such as the number of days away from work, and many are missing the OSHA required data elements such as time of event. Therefore, data from state workers' compensation programs cannot serve as a replacement for the annual survey.

Since employers may have recorded demographic and injury/illness circumstances information on a workers' compensation first report of injury/illness form, company accident report, or other document, the survey form allows employers to attach copies of these documents in lieu of entering responses to covered questions on the survey instrument.

5. Minimizing small employer burden.

The BLS minimizes the burden upon small employers by using a highly efficient stratified random sampling plan. Under this sampling plan, the smaller employment units within an industry have a lower probability of selection. In addition, using the electronic data collection option enables small employers with no Days Away From Work cases to simply enter information from the summary form for the survey on the Internet which completes their response.

6. Consequence of less frequent collection.

Operational and budgetary issues, along with the data uses described above, make collecting survey data annually essential. The annual survey is a cooperative program with state agencies, which are partially funded by the Federal government to collect and process the survey data. The states share the data with the BLS for generating national estimates. State grant agencies must finance half the costs by appropriation requests to their own state legislatures, many of which convene and appropriate funds over a cycle that may be different from the Federal budget cycle. Therefore, it is likely that many states would not be able to participate in a program of less frequent scheduling. If states do drop out, the Federal government needs to assume the collection of the data at an increased cost. In addition, the complex data collection and coding activities require a fully trained staff. With less frequent collection, and the associated unbalanced workloads, states would not be able to maintain the skilled staff needed to implement the survey.

At a joint meeting of the Occupational Safety and Health Statistics Committee of the Labor Research Advisory Council (LRAC) and the Business Research Advisory Council (BRAC) on August 4, 1977, a resolution was adopted opposing a change in the frequency of the survey. The resolution asserted that a less frequent survey would be "less responsive to the needs and considerations of the profession, Congress, and the public if carried out at less frequent periods."

7. Special Circumstances affecting Collection.

Survey data are collected once annually. Respondents have thirty days to complete survey forms and no additional copies are required. The BLS does not require survey record retention for respondents.

The survey provides valid and reliable estimates that reflect the worker injury and illness experience for the universe of private sector employers. Incident information for days away from work injuries and illnesses is classified by the BLS and participating state agencies using the BLS Occupational Injury and Illness Classification Structure which was submitted to OMB with the initial program redesign clearance in 1991.

8. Federal Register Notice and Outside Consultation.

Federal Register Notice.

A 60 day Federal Register was published in 81 FR 31666 on May 19, 2016.

The BLS received one response in support of the SOII collection from the Bureau of Economic Analysis as a result of this Federal Register notice.

The Bureau of Economic Analysis (BEA) supports the proposal of the Bureau of Labor Statistics, to collect case circumstance and worker characteristic data for days of job transfer or work restriction cases in select NAICS industries. In addition, BEA strongly supports the continued collection of the other data reported on Form 9300. The data collected from this form are important elements in the derivation of major components of BEA's economic statistics.

BEA uses data on occupational injuries/illnesses and days away from work to prepare estimates of employer contributions for workers' compensation by industry; a component of employer contributions for employee pension and insurance funds in national income. A list of specific items currently used is described in the attachment.

Consultations.

Semiannually, the BLS meets with both the Data Users Advisory Committee and the BLS Technical Advisory Committee to review

programs and to solicit advice and recommendations for program enhancement. The BLS also meets periodically with the Federal Economic Statistics Advisory Committee.

The BLS holds periodic conferences with the state agencies which receive grants to conduct the survey.

The BLS meets periodically with representatives of the OSHA and NIOSH.

9. Payments or Gifts.

No payments or gifts are provided to respondents.

10. Confidentiality.

The Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA) safeguards the confidentiality of individually identifiable information acquired under a pledge of confidentiality for exclusively statistical purposes by controlling access to, and uses made of, such information. CIPSEA includes fines and penalties for any knowing and willful disclosure of individually identifiable information by an officer, employee, or agent of the BLS.

Based on this law, the BLS provides respondents with the following confidentiality pledge/informed consent statement:

The Bureau of Labor Statistics, its employees, agents, and partner statistical agencies, will use the information you provide for statistical purposes only and will hold the information in confidence to the full extent permitted by law. In accordance with the Confidential Information Protection and Statistical Efficiency Act of 2002 (Title 5 of Public Law 107-347) and other applicable Federal laws, your responses will not be disclosed in identifiable form without your informed consent.

BLS policy on the confidential nature of respondent identifiable information (RII) states that "RII acquired or maintained by the BLS for exclusively statistical purposes and under a pledge of confidentiality shall be treated in a manner that ensures the information will be used only for statistical purposes and will be accessible only to authorized individuals with a need-to-know."

The 2016 reporting form, BLS No. 9300, and the related Internet data collection site, will carry the confidentiality statement referenced above.

State statutes in New Jersey, Maine, Wisconsin, Illinois and Guam allow disclosure of state and local government records. Therefore, these states do not pledge confidentiality to the state and local government units included in their samples.

11. Sensitive questions.

The name of the worker is obtained and used to facilitate recontacts with employers when data clarifications are required. The name of the worker will be deleted from the files as soon as the government wide restrictions from the Justice Department are removed.

The race of the injured/ill worker is requested at the option of the respondent. This information can be used to analyze work place injury and illness rates by race and to compare to health information by race from other sources.

12. Estimation of respondent burden.

Multiple factors contribute to the estimate of employer burden for the survey. First, the BLS individual case recording burden estimates are consistent with the burden estimates used by OSHA. Second, the 'Total Hours Worked' and the 'Employment Average' data elements requested in our Survey form 9300 are required on the OSHA Summary form 300A and are simply a transfer of data to the BLS form. Therefore, the burden of calculating hours and employment for those employers who normally must keep the OSHA 300A is already reflected in OSHA's burden hours.

Reporting Burden for the SOII Survey Data Collection (Form 9300).

As noted above, with the implementation of the OSHA Summary Form 300A, the completion of the SOII requires transferring totals or photocopying the summary form for Part 1 of survey form 9300. The BLS estimates each of the 240,000 sample units will spend an average of 10 minutes to complete Part 1 of the form. Therefore, the total burden for Part 1 of the form is 40,000 hours [(240,000 sample units x 10 minutes)/60 = 40,000 hours].

Form 9300 - Part I

Sector	Sample units	Hours
Private	220,000	36,667
Public (mandatory)	13,000	2,167
Public (voluntary)	7,000	1,166
Total	240,000	40,000

In Part 2 of the form, a burden allowance is provided to permit respondents to report up to 300,000 Days Away From Work cases and Days of Job Transfer or Restriction Pilot cases. The respondent copies the occupation and number of days away from work for each sampled injury/illness from the corresponding line of their Log of Work-Related Injuries and Illnesses. The other required information about the injured/ill worker and the incident is generally available from a workers' compensation report, a company accident report, an insurance form, or the OSHA

supplemental case form. The employer is given the option of attaching such a document in lieu of copying the data to the data collection form. The questions on race and type of job are optional. With an average burden of ten minutes per case, the total burden for Part 2 is 50,000 hours [(300,000 cases x 10 minutes)/60 = 50,000 hours].

Form 9300 - Part II

Sector	Days away from work cases and days of job transfer or restriction pilot cases	Hours
Private	255,000	42,500
Public (mandatory)	37,500	6,250
Public (voluntary)	7,500	1,250
Total	300,000	50,000

Total burden for the survey data collection Form 9300 is, therefore, 90,000 hours (40,000 + 50,000). The average reporting burden is then 22.5 minutes or .375 hours per respondent [90,000 hours/240,000 sample units = 0.375 hours per sample unit].

Sector	Hours
Private	79,167
Public (mandatory)	8,417
Public (voluntary)	2,416
Total	90,000

Reporting Burden for SOII Prenotification Recording.

Recording burden for normally exempt employers who are prenotified to keep records for a survey year is 220,500 hours. The BLS is using the OSHA estimate stated on the Log that each new entry on the Log requires, on average, 14 minutes. OSHA estimates that completion of the OSHA Injury and Illness Incident Report will require, on average 22 minutes. OSHA further estimates that completion of each summary form will require, on average, 50 minutes.

Form 9300 - Part I

Sector	Sample units	Hours
Private	155,000	129,167
Public (voluntary)	7,000	5,833
Total	162,000	135,000

Form 9300 - Part II

Sector	Days away from work cases and	Log hours	Incident report hours
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	days of job transfer or restriction pilot cases		
Private	135,000	31,500	49,500
Public (voluntary)	7,500	1,750	2,750
Total	142,500	33,250	52,250

Sector	Hours
Private	210,167 (31,500 + 49,500 + 129,167)
Public (voluntary)	10,333 (5,833 + 1,750 + 2,750)
Total	220,500

The BLS sample will include approximately 155,000 normally exempt private sector employers. It is expected that they will record up to 135,000 cases on the Log form for a total burden of 31,500 hours, $[(135,000 \text{ cases} \times 14 \text{ minutes})/60 = 31,500]$ and on the OSHA Injury and Illness Incident Report for 49,500 burden hours $[(135,000 \text{ cases} \times 22 \text{ minutes})/60 = 49,500]$. All 155,000 normally exempt prenotified employers will need to complete the 50 minute summary form for a burden of 129,167 hours $[(155,000 \text{ sample units} \times 50 \text{ minutes})/60 = 129,167]$. The total recordkeeping burden for this normally exempt group of employers will be 210,167 hours $(31,500 + 49,500 + 129,167)$.

The BLS sample will include approximately 7,000 normally exempt public sector employers. The estimate for state and local government agencies will increase recording burden by 10,333 hours to 246,166; $(7,000 \text{ sample units} \times 50 \text{ minutes})/60 = 5,833$ hours; $(7,500 \text{ cases} \times 14 \text{ minutes})/60 = 1,750$ hours; and $(7,500 \text{ cases} \times 22 \text{ minutes})/60 = 2,750$ hours. $5,833 + 1,750 + 2,750 = 10,333$ hours). The burden estimates are stated on the OSHA forms that will be provided to employers.

Total SOII Burden.

Combined burden for recording (220,500) plus reporting (90,000) on the BLS Form 9300 is 310,500 hours.

Sector	Sample units	Hours
Private	220,000	289,334 (36,667+42,500+210,167)
Public (mandatory)	13,000	8,417 (2,167+6,250)
Public (voluntary)	7,000	12,749 (1,166+1,250+10,333)
Total	240,000	310,500

SOII Burden Hours for SY 2016 through SY 2018.

Year	Sector	Reporting	Recording	Total Burden
2016	Private	79,167	210,167	289,334

	Public (m)	8,417	--	8,417
	Public (v)	2,416	10,333	12,749
	Total	90,000	220,500	310,500
2017	Private	79,167	210,167	289,334
	Public (m)	8,417	--	8,417
	Public (v)	2,416	10,333	12,749
	Total	90,000	220,500	310,500
2018	Private	79,167	210,167	289,334
	Public (m)	8,417	--	8,417
	Public (v)	2,416	10,333	12,749
	Total	90,000	220,500	310,500

Respondent cost for the SOII is estimated at \$7.03 million based on an employer cost of \$24.29 an hour (289,334 * \$24.29= approximately \$7.03 million). With the addition of state and local government units, this respondent cost is estimated at \$7.54 million based on an employer cost of \$24.29 an hour (310,500 * \$24.29= approximately \$7.54 million). The employer cost is based on employer costs for wages, salaries, and employee benefits for sales and office workers reported by the BLS for the latest available month: December 2015.

Reporting Burden for the Worker Survey Pilot Test.

	Number	Hours
Total Sample		
Ineligible units (20%)	21,150	n/a
Eligible units (80%)	16,920	n/a
Gain cooperation and roster (50%)	8,460	564
Refusal (50%)	8,460	282
Household Units with employed adult	5,500	n/a
Total Workers (1.4 per HH)	7,700	642
One injury	385	64
Two Injuries	39	3
Total Burden		1,555

As reported above, BLS will conduct a Worker Survey Pilot Test in 2017, with pre- and post-survey work occurring in 2016 and 2018. BLS will collect data from 5,500 households which meet screening criteria. The BLS estimates that 20 percent of the sample will be ineligible. For example, these units may have been converted to a business, unoccupied, or for which no usable data were collected. The BLS also anticipates a 50 percent response rate and that 65% of households will include a person 16 years old or older who has worked in the previous 12 months.

It is anticipated that the burden for refusals will be 282 hours (8,460 refusals x 2 minutes = 16,920 minutes).

The burden for gaining cooperation and "rostering" is anticipated to be 564 hours (8,460 units x 4 minutes = 33,840 minutes).

The survey burden for all eligible households, regardless of if any household member reported an injury or illness is estimated to be 641.67 hours (7,700 workers x 5 minutes = 38,500 minutes). The additional burden for workers with one injury is estimated to be 64.17 hours (385 x 10 minutes = 3,850 minutes) and 3.25 for respondents with two injuries (39 x 5 minutes = 195). Respondent cost for the Worker Survey Pilot Test is estimated at \$11,275 based on a respondent cost of \$7.25 an hour (1,555* \$7.25= \$11,273.75). The respondent cost is based on the national minimum wage.

A revision clearance request will be submitted prior to the start of the pilot data collection further detailing this test.

13. Annual cost burden to respondents.

Respondents are provided all materials needed to complete the survey. No capital costs or startup costs are incurred in the recordkeeping or reporting functions of this survey. The costs of generating, maintaining, and disclosing the information requested are direct burden hours as specified in item 12. The recordkeeping practices require only manual recording of information, thereby, no systems work would be required. Employers who have chosen to keep records electronically need only access them for survey purposes.

14. Cost to the Federal government.

Collection costs for the survey are funded on a 50/50 Federal-State matching basis. The Federal share of survey collection costs in Fiscal Year (FY) 2016 is around \$5 million, an amount that is being matched by participating states. In addition, approximately \$16 million in FY 2016 non-collection expenses is being incurred by the BLS, for the purpose of providing and maintaining the computers, telecommunications capacity, and software needed to capture the data, as well as retaining the staff who refine the design of the survey, select new survey samples each year, maintain data quality standards, produce and distribute estimates to the states, and publish the national data, as well as other related activities.

15. Change in burden hours.

There was a net reduction in burden of 26,879 hours (337,379 - 310,500). The reduction was the result of the completion of the follow-back survey accounting for 1,213 hours and the reduction in the normally exempt private sector employees from 175,000 to 155,000 cases.

16. Tabulation/publication timetable.

Results from the survey are published in press releases and in a bulletin. Data also are published in the President's Report on Occupational Safety and Health, an annual report to the U.S. Congress. Survey data also are available on the Internet. The industry rates and counts press release is released in October and now includes data on state and local government establishments. The characteristics of injured/ill workers press release is released in November.

Listed below is a summary timetable that identifies the major collection phases and tentative dates for publishing the data.

December/	
January	-Pre-notification mailing.
January	-Initial mailing of BLS No. 9300 forms to sample units.
March	-Second request mailing to nonrespondents.
April	-Third request mailing to nonrespondents.
May	-Telephone or mail follow-up of key nonrespondents
July	-Active collection of data closed.
October	-Industry rates and counts issued in news release and released on the Internet.
November	-Characteristics of injured/ill workers and circumstances of work place injuries and illnesses issued in news release and on Internet.

17. Display of expiration date.

The BLS requests an exemption from the display of the expiration date on the survey form. This allows for a savings in printing costs by providing the printer with final forms at an earlier date.

18. Exceptions to certification.

No exceptions to the certification statement are requested.