

**Supporting Statement for the Information Collection Requirements of the
OSHA Outreach Training Program
and
OSHA Training Institute Education Centers Program Data Collection
Office of Management and Budget (OMB)
Control No. 1218-0262
(July 2017)**

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.

Section 21 of the Occupational Safety and Health Act of 1970 authorizes the Occupational Safety and Health Administration (“OSHA” or the “Agency”) to conduct directly, or through grants and contracts, education and training courses. These courses must ensure an adequate number of qualified personnel to fulfill the purpose of the Act, provide them with short-term training, inform them of the importance and proper use of safety and health equipment, and train employers and employees to recognize, avoid, and prevent unsafe and unhealthful working conditions.

Consistent with the authority of Section 21 of the OSH Act, the Agency created two educational programs, the OSHA Outreach Training Program and the OSHA Training Institute Education (OTI) Centers Program.

In 1971, the OSHA Outreach Training Program was established to rapidly disseminate basic safety and health information to workers. Today, the Outreach Training Program provides awareness training to workers on the recognition, control and prevention of occupational safety and health hazards. Trainers who successfully complete an OSHA trainer course are authorized to conduct 10- and 30-hour Outreach training courses on occupational safety hazards. This is a voluntary program. Students who complete these Outreach courses receive a student course completion card from OSHA.

During the 1980s, the number of requests for training from private sector personnel and Federal personnel from agencies other than OSHA increased substantially and the demand eventually exceeded the capacity of the OSHA Training Institute. To meet the increased demand, in October 1992, the OSHA Training Institute Education Centers Program was created when OSHA began partnering with nonprofit organizations and other training and educational institutions to conduct OSHA Training Institute courses for private sector personal and federal personnel from agencies other than OSHA. These approved centers are referred to as the OSHA Training Institute Education Centers or “OTI Education Centers.”

Subsequently, additional organizations were selected through a series of national competitions. The program currently has 26 OTI Education Centers comprised of 40 member organizations.

The Directorate of Training and Education (DTE) is responsible for policy guidance, management and administration of the OSHA Outreach Training Program and the OTI Education Centers Program, among other programs. The Directorate of Training and Education collects and reports student training information on a monthly basis.

To be a participant in one of the educational programs, an individual/organization must provide the DTE, Office of Training Programs and Administration (OTPA), with certain information.

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.

A. Title: Application to become an OSHA Training Institute Education Center (OTI Education Center)

Information Collected: Identifying data such as name; organization; address; consortium partners, if applicable; consortium partner address (s), if applicable; authority to apply; evidence of nonprofit status; status as a training organization; relevant occupational safety and health training experience; relevant curriculum development experience; administrative and occupational safety and health staff qualifications; ability to deliver OSHA OTI Education Center courses; description of training and testing facilities; description of training experience; copies of catalogues and other recruiting materials; description of systems to administer and monitor the OSHA Outreach Training Program; description of the applicant's recruitment, marketing, and registration plans; description of training facility's accessibility to transportation and lodging accommodation, and pricing of those services; information on host site locations; description of organization's ability to provide off-site courses; description of administrative capabilities to manage an OTI Education Center; ability to complete required reporting requirements; description of organizations ability to conduct course evaluations; and copies of the organization's non-discrimination policies for staff and students. **(Attachment A, copy of Federal Register Notice - Draft, OSHA Training Institute Education Center; Notice of Competition and Request for Applications.)**

Purpose: To obtain basic information about the applicant organization and application, to evaluate the qualifications of the applicants and their ability to serve the regional population and to determine ability to conduct OSHA courses for private sector personnel and federal personnel from agencies other than OSHA. To evaluate the applicant organization's competence to provide the proposed training (including the qualifications of the personnel to manage and implement the training).

B. Title: OTI Education Centers Monthly Summary Report for the OTI Education Centers and Outreach Training Program Monthly Summary Report (Attachment B)

B1. Information Collected for OTI Education Center Courses conducted within the OTI Education Center's OSHA Region: OTI Education Centers must submit monthly information to the Directorate of Training and Education, Office of Training Programs and Administration, on the OTI Education Center's activities including: course numbers/titles, OTI Education Center name, dates and locations of training courses (training location, city, state, or country if outside the U.S.), number of students trained, student contact hours, course lead instructor, other

instructor name(s), number of students attempting exam, number of students taking re-test, number of students passing exam, average test score, and demographic student breakdown (Federal OSHA Personnel, Other Federal Agency Personnel, State OSHA Personnel, Other State Personnel, Private Sector Personnel, and Foreign Students).

B2. Information Collected for the Outreach Training Program classes: OTI Education Centers receive requests from Outreach trainers for cards to provide to their students who have successfully completed one of the OSHA Outreach Training Program courses (see item D, Outreach Training Program Report Forms). With this information, the OTI Education Centers report monthly the number of classes conducted and the number of students trained for each Outreach Training Program (Construction, General Industry, Maritime, and Disaster Site Worker) class. OTI Education Centers receive their Outreach training card supply from the Directorate of Training and Education, Office of Training Programs and Administration.

B3. Information Collected for the Outreach Training Program Monitoring: OTI Education Centers are required to perform record and activity audits on Outreach trainers. The OTI Education Centers report monthly the date the monitoring activity was initiated and completed, the basis and type of monitoring activity, the number of classes include in the records audit, the type of training class observed, training hours observed, trainer information (name and address), audit results and follow-up actions. OSHA uses this information to monitoring Outreach Training Program activity, and to deter fraudulent activities.

B4. Information Collected for OTI Education Center Courses conducted out of the OTI Education Center's OSHA Region: OTI Education Centers must submit monthly information on the OTI Education Center's upcoming activities outside of the OSHA Region in which they are located, including: course numbers/titles, OTI Education Center name, dates and locations of training courses (training location city, state, or country, if outside the U.S.), number of students projected to be trained, student contact hours, course lead instructor, other instructor name(s), point-of-contact at OTI Education Center, the submission date, and comments.

Purpose: Program management, oversight, and reporting. To monitor training activity and evaluate training conducted versus established goals and objectives of the Agency. To submit data for the annual workload summary for comparison with projected milestones. To monitor the implementation of new performance measures; track performance outcomes and efficiency measures; measure monthly, annual and long-term performance targets established for the programs and for information to prepare annual reports to Congress.

C. Title: Statement of Compliance with Outreach Training Program Requirements (Attachment C)

Information Collected: Trainer signature, date, typed or printed name, name of OSHA Outreach Training Program course and course dates (to be completed by OTI Education Center), and name of OTI Education Center (completed by the OTI Education Center) (Attachment C, Statement of Compliance with Outreach Training Program Requirements). ^{1/}

^{1/} Unless otherwise noted, the information requested would be provided by an authorized OSHA Outreach trainer.

Purpose: Execution of the Statement of Compliance will serve as a self certification of Outreach trainer knowledge of and compliance with the Outreach Training Program Requirements and procedures and to improve processing efficiency while maintaining program integrity and deterring fraud.

D. Title: Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker)

Information Collected: Trainer information (name, ID number, address, phone, email), Authorizing Training Organization, most recent trainer course, trainer card expiration date, type of course conducted (i.e., 10- or 30-hour construction; 10- or 30-hour general industry; 10- or 30-hour maritime; or disaster site worker); course information (indicate whether course was offered in Spanish, to Youth [age 18 or less], indicate the language if other than English or Spanish, training location and/or whether training conducted was related to an OSHA Alliance or Partnership); number of students, training site information (address, type of location); course duration (start and end times and dates), sponsoring organization, first and last name of students, trainer signature and date signed. The following information is requested to determine where student cards should be sent: ^{2/} company name/department; address; city; state; zip; phone number; extension; email; copy of trainer card; topic list and time spent on each required, elective or optional topic.

Each Outreach training (i.e., the 10- and 30-hour construction, 10-and 30-hour general industry, 10- and 30-hour maritime, and disaster site worker) has a set of required, elective, and optional course topics. Because training topics covered and the length of time for each topic area may vary, the Outreach Training Program Report must be completed following each course conducted.

To maintain program integrity and deter fraud, OSHA Outreach trainers are required to maintain records which include student sign-in sheets, student addresses, and a copy of the documentation sent in to request student completion cards, including a list of the topics taught and the amount of time spent on each topic; a copy of the student course completion cards, a list of guest trainers and additional authorized Outreach trainers that instructed in the course. **(Attachment D, Outreach Training Report for Construction; Attachment E, Outreach Training Report for General Industry; Attachment F, Outreach Training Report for Maritime Industry, and Attachment G, Outreach Training Program Report for Disaster Site Worker).**

Purpose: To monitor training activity and evaluate training conducted versus established goals and objectives of the Agency. These forms are necessary to review compliance with the Outreach Training Program Requirements and to get student completion cards to the trainer(s). This information is also needed to improve processing efficiency while maintaining program integrity and deterring fraud.

^{2/} If the Outreach trainer already has an ID number and the address where student cards should be sent has not changed since the last request for students cards, the trainer may leave this section blank.

E. Title: Online Outreach Training Program Report

Information Collected: Trainer information (name, ID number, address, phone, email), Authorizing Training Organization, most recent trainer course, trainer card expiration date, course information (indicate whether course was offered in Spanish, to Youth [age 18 or less], indicate the language if other than English or Spanish, training location and/or whether training conducted was related to an OSHA Alliance or Partnership); number of students, type of course conducted (i.e., 10- or 30-hour construction; 10- or 30-hour general industry); course duration (start and end times and dates), trainer signature and date signed. The following information is requested to determine where student cards should be sent: ^{3/} company name/department; address; city; state; zip; phone number; extension; email; copy of trainer card; topic list and time spent on each required, elective or optional topic.

Purpose: To monitor online training activity and evaluate training conducted versus established goals and objectives of the Agency. This document is necessary to review compliance with the Outreach Training Program Requirements and procedures, and to get student completion cards to the Outreach trainer(s). OSHA has recommended format for submission via U.S. mail (**Attachment H, Online Outreach Training Program Report**).

F. Title: Outreach Trainer List

Information Collected: Authorizing OTI Education Center, Trainer name, mailing address, phone number, email address, trainer industry program authorization card number and date issued.

Purpose: To maintain a list of authorized Outreach trainers. These lists are maintained for investigation purposes and to assist individuals who are searching for Outreach Training Program courses available in their vicinity. The OTI Education Centers provide this list monthly to DTE. (**Attachment I, Outreach Trainer Data List**)

G. Title: Attendance Documentation for OTI Education Centers

Information Collected: The following is collected for each class: daily sign-in sheets (student first name, middle initial, and last name; course name and number; date; location (city and state the course was conducted); instructor name and signature, the name of the OTI Education Center who sponsored or conducted the training, and course prerequisite information (student employment history, copy of current Outreach trainer card or copy of official transcript), if applicable.

OSHA believes the daily sign-in sheet is not within the definition of “information” under 5 CFR 1320.3(h)(1). The daily training sign-in sheet does not entail additional burden other than to identify the student, the date, and the course name and signature of trainer. However, OTI Education Centers must also submit the prerequisite information completed and submitted by the student to the OTI Education Center, if applicable, which does require burden on part of the OTI Education Center.

^{3/} If the Outreach trainer already has an ID number and the address where student cards should be sent has not changed since the last request for students cards, the trainer may leave this section blank.

Purpose: Program management and oversight. To verify student attendance as reflected in monthly summary reports.

H Title: Outreach Online Training Certification Statement

Information Collected: Online organization and type of Outreach Training Program and changes made since the last certification that their online program was current.

Purpose: To ensure program is periodically reviewed and updated to reflect current OSHA Outreach Training Program Requirements and procedures.

I. Title: Instructor and Staff Resumes (this includes anyone who may be assigned to conduct OSHA classes, contractor, subcontractor, employee, adjunct professor, etc.)

Information Collected: This information is collected from the OTI Education Centers and includes résumés of current staff and position descriptions and minimum hiring qualifications for all positions, whether filled or vacant, that may be assigned to conduct OSHA classes. Work history, education, and other qualifications such as Certified Safety Professional (CSP), Professional Engineer (PE), or Certified Safety Hygienist (CIH).

Purpose: For program management and oversight and to obtain the instructor knowledge and experience with OSHA standards and their application to hazards and hazard abatement.

J. Title: Course Material upon Request by OSHA from OTI Education Centers

Information Collected: Curriculum related content, manuals, and test questions.

Purpose: To monitor the program content and ensure quality and consistency. The materials are helpful in developing future curriculum and meeting the needs of the Agency's product/service users.

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

OSHA has endeavored to make the collection of the above-referenced information easy for program participants to complete and submit. Currently program participants have the option to complete and submit the following data electronically:

A. OTI Education Center Monthly Summary Report for OTI Education Centers and Outreach Training Program Monthly Summary Report

B. Statement of Compliance with Outreach Training Program Requirements

C. Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker Outreach Programs)

D. Online Outreach Training Program Report

E. Outreach Trainer Lists

F. Outreach Online Training Certification Statement

G. Instructor and Staff Résumés

H. Course Materials upon requests from OTI Education Centers

Due to the nature of the material requested, currently program participants are required to manually submit the following:

A. Application to become an OSHA Training Institute Education Center (OTI Education Center)

B. Attendance Documentation for OTI Education Centers

Regarding B, OTI Education Centers submit copies of student attendance documentation which includes multiple student signatures.

Whenever possible, the Agency is making efforts to allow electronic submissions in order to increase efficiency and consistency, and minimize the burden on program participants.

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

This information is not available in any other manner. The paperwork requirements of the documents listed above are specific to each student, trainer, or OTI Education Center involved, and no other source or agency duplicates these requirements or can make the required information available to OSHA.

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

The collection of this information does not have a significant economic impact on small entities. The information provided to OSHA from the OTI Education Centers and the Outreach Trainers imposes a minimal burden on the students, trainers, and/or OTI Education Centers. Whenever possible, the Agency is making efforts to allow electronic submissions in order to minimize the burden to the program participants.

6. Describe the consequences 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.

Without this information the agency would be unable to determine the extent to which OSHA's overall training goals and objectives are met.

Additionally, the number of workers receiving safety and health training via the OSHA Outreach Training Program may decline and the rate of accidents, injuries, and even death will likely increase. Without monitoring and reporting requirements, the Program may experience additional fraudulent activity.

7. Explain any special circumstance(s) that would cause information collection to be conducted in a manner:

(1) Requiring respondents to report information to the agency more often than quarterly;

Data collected monthly from OTI Education Centers provide appropriate levels of program oversight and an opportunity to timely reconcile reporting discrepancies.

Trainer data collected as courses are delivered to verify course information and ensure timely dissemination of student completion cards to course attendees.

Outreach trainer lists are required to ensure workers are informed where they can obtain safety and health training and to conduct investigations into alleged fraudulent activity.

(2) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

The Agency does not require respondents to prepare a written response to a collection of information in fewer than 30 days after receipt.

(3) Requiring respondents to submit more than an original and two copies of any document;

There are no instances where the Agency requires the submission of an original and two copies of any document.

(4) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

The OTI Education Centers record retention is based on the organizations' policy.

Outreach Training Program records are retained by OSHA, the OTI Education Centers, and the authorized Outreach trainers for five years to ensure the identification of students and records associated with a trainer during the trainer's authorization period. This also ensures that students are able to obtain replacement cards when they are lost or misplaced.

(5) 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;

Not applicable.

(6) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

Not applicable.

(7) 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

Not applicable.

(8) Requiring respondents to submit proprietary trade secrets, 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.

Not applicable.

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 received 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 instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As required by the Paperwork Reduction Act (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the *Federal Register* on April 25, 2017 (82 FR 19089, Docket Number OSHA-2009-0022), requesting public comments from the public and other interested parties on its proposed extension of the collection of information requirements contained in the OSHA Training Institute Education Centers Program and the OSHA Outreach Training Program. The notice was part of a preclearance consultation program that provided interested parties with the opportunity to comment on OSHA's request for an extension by the Office of Management and Budget (OMB) of a previous approval of the collections of information found in the Standard. The Agency received no public comments on the notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of 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 for the assurance in statute, regulations, or agency policy.

The Agency provides no assurance of confidentiality regarding the information that is collected from OTI Education Center applicants or data received from the OTI Education Centers.

Participants understand that if approved to participate in the OSHA Training Institute Education Center or the OSHA Outreach Training Program, their application/information becomes public record. 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 of 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 14.

Summary of Burden Hours, Costs and Responses

Collection of Information requirement	Burden Hours	Costs	Avg. Annual Responses
A. Application to become an OSHA Training Institute Education Center (OTI Education Center)	480	\$20,201	8
B. OTI Education Centers Monthly Summary Report for the OTI Education Centers and Outreach Training Program Activities and Monitoring	1,782	\$53,004	324
C. Statement of Compliance with Outreach Training Program Requirements	0	\$0	0
D. Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker)	12,964	\$481,483	51,857
E. Outreach Reporting Required for Online Trainers	88	\$3,268	520

Collection of Information requirement	Burden Hours	Costs	Avg. Annual Responses
F. Outreach Trainer List	324	\$11,071	324
G. Attendance Documentation for OTI Education Centers	135	\$3,017	135
H. Outreach Online Training Certification Statement	18	\$669	104
I. Instructor and Staff Resumes	2	\$74	40
J. Course Material Upon Requests by OSHA from OTI Education Centers	120	\$9,792	40
Totals	15,913	\$582,579	53,352

OSHA's estimates of the burden hours and costs for each information collection requirement are calculated below. Costs and burden hours are rounded to total dollar and hour amounts. The number of applications, OTI Education Centers, and Outreach Trainers, and students trained are based on previous numbers submitted or the most current data available at this time. The Agency determined average wage rates for average hourly earnings, including benefits, to represent the cost of worker time. For the relevant occupational categories, OSHA adjusted the mean hourly earnings according to the Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Employment Statistics (OES), May 2015 (www.bls.gov/oes/) to allow for fringe benefits. To account for fringe benefits, we used the fringe benefit rate reported in BLS' Employer Costs for Worker Compensation (ECEC) news release for September 2016. BLS reported that for private industry, fringe benefits accounted for 31.4 percent of total compensation and wages accounted for the remaining 68.6 percent. To calculate the loaded hourly wage for each occupation, thus we divide the mean hourly wage by 68.6 percent. In addition, the Agency uses the following wage rates in making the cost determination for the Information Collection Requests:

Manager: (OES 11-1021) $\$55.30 / .686 = \$ 81.60$
Worker: (OES 25-0000) $\$25.48 / .686 = \37.14
Clerical: (OES 43-9061) $\$15.33 / .686 = \22.35

A. Title: Application to become an OSHA Training Institute Education Center (OTI Education Center).

OSHA publishes a notice announcing the opportunity for interested nonprofit organizations to become an OTI Education Center. In 2012, the Agency received approximately 41 applications. Given OSHA only publishes notices approximately every five years, we have annualized the number of applications to 8 ($41/5 \text{ years} = 8.2$)

Number of Responses Per Year	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
8	1 time	10 hours	80 hours	\$81.60 (manager)	\$6,528
8	1 time	40 hours	320 hours	\$37.14 (employee)	\$11,885
8	1 time	10 hours	80 hours	\$22.35 (clerical)	\$1,788
Totals			480		\$20,201

B. Title: OTI Education Center Monthly Summary Report for the OTI Education Centers and Outreach Training Program Activities.

B1. OSHA Training Institute Education Centers Reporting:

OTI Education Centers must submit monthly information to the Directorate of Training and Education (DTE), Office of Training Programs and Administration.

Based on the wage rates referenced above, each OTI Education Center expends approximately two hours per month preparing and submitting a monthly summary report. One hour is allocated by a general employee earning \$37.14 per hour and the other hour is allocated towards the preparation of the monthly summary report by clerical staff earning approximately \$22.35

Number of Responses (currently 27 OTI Education Centers)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
324	Monthly	1 hour	324	\$37.14 (employee)	\$12,033
324	Monthly	1 hour	324	\$22.35 (clerical)	\$7,241
Totals			648		\$19,274

B2. OSHA Outreach Training Program Reporting: OTI Education Centers collect Outreach trainer data (see item D, Outreach Training Program Reports) and process these requests. Trainer requests for student cards are processed by the OTI Education Center where the Trainer received training. This is reported to DTE each month by the OTI Education Center.

Number of Responses (27 OTI Education Centers)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
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324	Monthly	1 hour	324	\$37.14 (employee)	\$12,033
324	Monthly	1 hour	324	\$22.35 (clerical)	\$7,241
Totals			648		\$19,274

B3. Information Collected for the Outreach Training Program Monitoring: OTI Education Centers are required to perform record and activity audits on Outreach trainers and report the results monthly to the Directorate of Training and Education, Office of Training Programs and Administration.

Number of Responses (27 OTI Education Centers)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
324	Monthly	0.5 hour	162	\$37.14 (employee)	\$6,017
324	Monthly	0.5 hour	162	\$22.35 (clerical)	\$3,621
Totals			324		\$9,638

B4. Information Collected for OTI Education Center Courses conducted out of the OTI Education Center's OSHA Region: OTI Education Centers are required to inform the Directorate of Training and Education, Office of Training Programs and Administration of any class they plan to conduct out-of-region to provide OSHA advanced notice, which OSHA can use to answer questions from other OTI Education Centers and the public.

Number of Responses (27 OTI Education Centers)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
324	Monthly	0.25 hour	81	\$37.14 (employee)	\$3,008
324	Monthly	0.25 hour	81	\$22,35 (clerical)	\$1,810
Totals			162		\$4,818

C. **Title: Statement of Compliance with Outreach Training Program Requirements**

OTI Education Centers are the primary administrators of the OSHA Outreach Training Program. As a heightened measure to address concerns regarding Outreach trainer misconduct or fraudulent activity with the Outreach Training Program, OSHA is asking each OTI Education Center to gather a Statement of Compliance for each student who completes any of the train-the-trainer courses.^{4/} At the end of each trainer course, each student signs and returns the Statement of Compliance to the OTI Education Center and the OTI Education Center retains the Statement of Compliance as part of the Outreach trainer’s permanent file.

OSHA believes the Statement of Compliance is **not** within the definition of “information” under 5 CFR 1320.3(h)(1). This Statement does not entail additional burden other than that necessary to identify the respondent, the date and the nature of the instruction (training course information). Therefore, the Agency has provided no burden hours as the Statement of Compliance is not within the definition of “information” and/or generally includes customary and usual business practices.

D. **Title: Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker Outreach Programs)**

Upon completion of each Outreach course, the trainer must submit information as stated under Item 2, B2. OSHA estimates that for each course the trainer will take 15 minutes (0.25 hour) to obtain, document and submit the required information. The number of courses has been averaged over a three year period, 2014 through 2016. For purposes of estimating costs, the Agency estimates that an Outreach trainer earns approximately \$37.14 per hour:

^{4/} The train-the-trainer courses currently include the following: #500 - Trainer Course in Occupational Safety and Health Standards for the Construction Industry; #501- Trainer Course in Occupational Safety and Health Standards for General Industry; #502- Update [for Construction Industry Outreach Trainers](#); and #503 - Update for General Industry Outreach Trainers; #5400 - Trainer Course in OSHA Standards for the Maritime Industry; #5600 - Disaster Site Worker Train-the-Trainer Course; and #5602 - Update for Disaster Site Worker Trainer Course.

Estimated Number of Courses per Year (averaged)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
51,857	After each outreach course	0.25 hour	12,964	\$37.14 (employee)	\$481,483

E. Title: **Outreach Reporting Required for Online Trainer**

Upon completion of each online Outreach course, the online provider must collect information as stated under Item 2, E above. Depending on the number of online programs offered, the online providers provide a report, no more than twice a month, to the Directorate of Training and Education, Office of Training Programs and Administration. OSHA estimates the number of reports received per year at 430 and that for each course the online provider conducts, it will take approximately 10 minutes (0.17 hour) to obtain, document, and submit the required information. The number of reports has been averaged over a three year period, 2014 through 2016. For purposes of estimating costs, the agency estimates that a Trainer earns \$28.55 per hour:

Estimated Total Number of Reports per Year (averaged)	Frequency of Response Varies	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
520	After each online Outreach course	0.17 hour	88	\$37.14 (employee)	\$3,268

F. Title: **Outreach Trainer List**

The OTI Education Center collects information regarding all authorized Outreach trainers. Since this information is readily available (Necessary information is provided upon successful completion of the trainer or update course), OSHA assumes that it will take approximately 1 hour per month for the OTI Education Centers to prepare and submit this report electronically.

Estimated Number of Responses	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
324	Monthly	1.0 hour	324	\$34.17 (employee)	\$11,071

G. Title: Attendance Documentation for OTI Education Centers

The Agency requires the OTI Education Centers to collect daily student sign-in sheets for each course conducted; and the Agency requests this information on a quarterly basis for a random number and type of classes.

Each student is required to sign their name next to their printed name on a daily sign-in sheet. OSHA also requires the instructor to sign the sign-in sheet to certify the attendance documentation is accurate. Since all OTI Education Centers have electronic registration, the printed name of registered students is readily available.

OSHA believes the daily sign-in sheet is not within the definition of “information” under 5 CFR 1320.3(h)(1). The daily training sign-in sheet does not entail additional burden other than to identify the student, the date, and the course name and signature of trainer. However, OTI Education Centers must also submit the prerequisite information completed and submitted by the student to the OTI Education Center, if applicable, which does require burden on part of the OTI Education Center.

OSHA assumes that it will take approximately 15 minutes (0.25 hour) for the OTI Education Centers to provide the daily sign-in sheet, along with the prerequisite information to OSHA. On average five classes from each OTI Education Center is audited per quarter.

Estimated Number of Courses Audited (per quarter)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
135	Quarterly	0.25 hour	135	\$22.35 (clerical)	\$3,017

H. Title: Online Training Program Statement of Certification

At a minimum, an online Outreach training provider must provide to the Directorate of Training and Education a quarterly report (essentially a negative report) or must immediately report any significant changes made to an online Outreach training program. The online Outreach training provider is required to sign a Statement of Certification that the online OSHA training courses have been conducted in accordance with the current OSHA Outreach Training Program Requirements and procedures, and document in detail any changes made. If no changes are implemented, the online Outreach training provider must provide the Directorate of Training and Education a negative report.

OSHA currently has 26 accepted online Outreach Training programs. OSHA estimates the average organization will take 10 minutes (0.17 hour) per accepted program to obtain, document, and submit the required information. For purposes of estimating courses, the agency estimates that an employee earns \$37.14 per hour:

Estimated Number of Programs (per year)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
104	Quarterly	0.17 hour	18 hours	\$37.14 (employee)	\$669

I. Title: Instructor and Staff Resumes (this includes anyone who may be assigned to conduct OSHA classes, whether a contractor, subcontractor, employee, adjunct professor, etc.)

During the application process for new OTI Education Centers or as new staff is hired or changes are made, the Agency requires the OTI Education Centers to provide OSHA with a copy of the resume of the instructor and/or their staff. The Agency encourages the submission of the resumes in an electronic format (via email). Since it is likely that the OTI Education Center receives the resumes electronically, OSHA estimates that it will take the OTI Education Center Director or their staff approximately 3 minutes (0.05 hour) to submit the required information. For purposes of estimating courses, the agency estimates that an OTI Education Center employee earns \$37.14 per hour.

Estimated Number of Instructors/Staff personnel	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
40	1 x or when staff changes are made	0.05 hour	2.0	\$37.14 (employee)	\$74

J. Title: Course Material Upon Requests from OTI Education Centers

On an as-needed basis, the Directorate of Training and Education requests the OSHA Training Institute Education Centers to provide curriculum related content, manuals, and test questions to monitor program content and ensure quality and consistency. These materials are provided to the Directorate of Training and Education, Office of Training Programs and Administration.

Since most of the materials have already been created or are in existence, the Agency calculates the burden by using 3 hours as the average yearly total.

Estimated Number of Responses (per year)	Frequency of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs
40	Varies	3 hours	120	\$81.60 (manager)	\$9,792

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 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 additional costs to the respondents other than their time.

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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

OSHA estimates that the total annual cost to the Federal government of collecting and maintaining the information collected on these forms is about \$74,323.

Annual record storage costs for these forms is estimated at \$1,212 (\$34.62/square foot x 35 square feet = \$1,212).

For each collection, several government employees at differing grades may be involved in processing, analyzing, and if necessary preparing reports. OSHA estimates that 1,692 hours are spent on the collection of information requirements contained in the OSHA Training Institute Education Center Program, and the Outreach Training Program. The Agency determined that a GS-12, Step 5⁵ (\$43.21) represents the average wage rate for the government staff working on

⁵ Office of Personnel Management, 2017 General Schedule, CHICAGO-NAPERVILLE, IL-IN-WI <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2017/general-schedule/>

these collections of information requirements. The total hourly cost to the Federal government is \$71,808 (1,692 hours x \$43.21 = \$73,111). See the table below for a breakdown of hours.

Burden Hours for Federal Government

Collection of Information requirement	Action	Time per Response	Total Hours
A. Application to become an OSHA Training Institute Education Center (OTI Education Center)	Review 8 Applications	18 hours	144
B. OTI Education Center Monthly Summary Report, including Outreach Reporting	Review Summary Reports (27 x 2 x 12 = 648)	1 hour	648
C. Statement of Compliance with Outreach Training Program Requirements” (proposed)	Not Applicable: These Requirements are processed at the OTI Education Centers and costs are assumed under Item 12.		N/A
D. Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker Outreach Programs)			
E. Outreach Reporting Required for Online Trainers	Review and process 520 student completion card requests and report same	0.5 hours	260
F. Outreach Trainer List	Ensure receipt of Outreach Trainer Lists monthly from 27 OTI Education Centers and upload to main database = (27 x 12 = 324)	1.0 hour	324
G. Attendance Documentation for OTI Education Centers	OTI Education Centers – 135 requests for class documentation	2 hours to analyze, compare to monthly reports, and document	270
H. Outreach Online Training Certification Statement	Analyze Online Training Certifications 104	0.25 hour	26
I. Instructor and Staff Resumes	Review new resumes/ approximately 40	0.50 hour	20
TOTAL			1,692

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

The Agency is requesting a 1,621 hour burden hour adjustment increase from 14,292 to 15,913 hours. This increase results from an increase in the number of students trained and courses offered.

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 the report, publication dates, and other actions.

Not applicable.

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

The expiration date will be displayed on the data collected.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This Supporting Statement does not contain any collection of information requirements that employ statistical methods.

Attachments

Attachment A: Copy of Draft Federal Register Notice – undated – FY 2017 OSHA Training Institute Education Center; Notice of Competition and Request for Applications.

Attachment B: OSHA Training Institute Education Center Monthly Summary Report (includes Outreach Training Program Monthly Summary Report)

Attachment C: Statement of Compliance with Outreach Training Program Requirements

Attachment D: Outreach Training Program Report for Construction

Attachment E: Outreach Training Program Report for General Industry

Attachment F: Outreach Training Program Report for Maritime Industry

Attachment G: OSHA Outreach Training Report for Disaster Site Worker

Attachment H: Online Outreach Training Program Report

Attachment I: Outreach Trainer Data List Report