

**SUPPORTING STATEMENT FOR THE  
INFORMATION COLLECTION REQUIREMENTS OF THE  
NATIONAL SAFETY STAND-DOWN TO PREVENT FALLS IN CONSTRUCTION  
OFFICE OF MANAGEMENT AND BUDGET (OMB)  
CONTROL NO. 1218-0NEW**

**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 (2)(b)(1) of the Occupational Safety and Health Act of 1970 (the “OSH Act”) (29 U.S.C. 670) authorizes the Occupational Safety and Health Administration (“OSHA” or the “Agency”) to assure safe and healthful working conditions by encouraging employers and employees to reduce the number of occupational safety and health hazards at their places of employment and to stimulate employers and employees to institute new and to perfect existing programs for providing safe and healthful working conditions.

Falls are a leading cause of death for employees, accounting for 350 of the 937 construction fatalities and 648 of the 4,836 fatalities in all industries recorded in 2015 (BLS data). The National Safety Stand-Down to Prevent Falls in Construction raises fall hazard awareness across the country in an effort to stop fall fatalities and injuries. The Stand-Down is the biggest occupational safety outreach event ever conducted. OSHA has collaborated with countless industry leaders and employers over the last four years to reach over 7.5 million workers during Stand-Downs.

- 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.**

Participants (mainly employers) download a Certificate of Participation by completing a simple eight question online survey (see attached example from 2017). The survey is OSHA’s primary means of validating participation in the Stand-Down. The survey questions are as follows:

1. **(Required) - Name of Business:** We collect this information only for printing the business name on the Certificate of Participation.
2. **(Optional) - Project Title:** This option is available to employers who want to identify a particular project on their Certificate of Participation.

3. **(Required) - State:** We use this information to determine the campaign's geographical reach and participation in the Agency's ten designated regions.
4. **(Required) - Type of Industry:** This information is for analyzing effectiveness of the campaign in reaching the targeted audience(s).
5. **(Required) - Number of Employees who participated:** This information is the Agency's primary means of determining overall participation in the Stand-Down.
6. (Optional) - **Number of years of participation:** This option is available to employers who wish special recognition (bronze, silver or gold) on their Certificate of Participation based on how many years they've conducted Stand-Downs.
7. (Optional) - **Please tell us about your Stand-Down. What did you do? What materials did you use? How did it go? What do you expect to happen as a result of the Stand-Down? Please indicate if you give the Agency consent to use your comments in our program assessment and promotional activities. Yes  No** : This optional information sharing opportunity provides employers a forum to share with OSHA the elements of their successful Stand-Down. They can also give the Agency feedback on the quality/effectiveness of the outreach material we and our partners develop to help employers conduct their Stand-Down. Participants oftentimes share the cultural changes they experienced, or anticipate, as the direct result of their Stand-Down event. The Agency desires to share some of those experiences (with the participant's consent) with other members in the industry. Some employers do not participate because they do not realize how easy it is to host a Stand-Down. Sharing the success stories of a few employers can simplify the process for others and increase participation in subsequent years. We expanded the instructions for this optional question to clearly request the submitter's permission to share their comments with the public.
8. (Optional) - **How can we improve future initiatives like this? What could have been better? Please indicate if you give the Agency consent to use your comments in our program assessment and promotional activities. Yes  No** : This optional question affords industry an opportunity to tell us how we can make the Stand-Down better. Continuous process evaluation and improvement is essential to successful programs. We expanded the instructions for this optional question to clearly request the submitter's permission to share their comments with the public.

The Agency will use the information collected from the survey to determine the effectiveness of the Stand-Down (i.e., are we reaching our target audience; how effective is our messaging; is the

quality of our outreach material appropriate; are we distributing the right quantity of material; how are participants using the material; and, what can we do to make the Stand-Down better.) The Agency will publish the results of the survey in a report and post it on the Stand-Down webpage. OSHA will use key elements, such as the number of Stand-Downs and participants, for marketing the next years' event. The Agency will also share "best practices" (with the consent of the submitters) to help other employers improve their Stand-Down efforts.

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

The entire process is conducted online on the Stand-Down "Certificate of Participation" webpage. After conducting their Stand-Down, participating employers will be encouraged to complete the online survey about their stand-down experience. Upon completion of the survey, they can print their Certificate of Participation.

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

Neither the Department nor OSHA currently collects this information; however, prior iterations were approved via a generic clearance. A standalone collection is preferred, because the agency does intend to publish some information in the Annual Falls Stand-Down Report. Stand-Down participants are the only ones who can provide the information requested in the survey.

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

The information collection does not have a significant impact on a substantial number of small entities. The amount of time needed to complete the survey is approximately 10 minutes.

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

Falls are a leading cause of death for employees, accounting for 350 of the 937 construction fatalities and 648 of the 4,836 fatalities in all industries recorded in 2015 (BLS data). The Agency is continually searching for impactful ways to reverse this unacceptable trend. We

believe collaboration with the industry will have a positive effect in this area. The survey will provide fall prevention information we share across the industry. Many employers have implemented innovative ways of messaging fall prevention and experienced cultural changes in their organizations.

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

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No special circumstances exist that would require employers to collect information using the procedures specified by this item. The requirements are within the guidelines set forth in 5 CFR 1320.5.

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

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

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

As required by the Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the Federal Register on January 12, 2018 (83 FR 1630) soliciting comments on its proposal for the Office of Management and Budget's approval of the information collection requirements specified by the National Safety Stand-Down to Prevent Falls in Construction. This notice is part of a preclearance consultation program that provides the general public and government agencies with an opportunity to comment. The Agency received one comment from a public citizen (see Docket Number OSHA-2017-0012). The commenter addressed the importance of safety in the construction industry and how important the fall stand downs are to employees. The commenter felt that stand downs should not be considered a burden to employers and supported the falls safety stand down.

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

No payments or gifts will be provided to the respondents. Participants (mainly employers) download a printable Certificate of Participation after completing an eight question online survey.

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

We will protect this information to the greatest extent provided by law.

**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.**

None of the questions in the survey require 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 costs to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

**Respondent Burden Hour and Cost Burden Determinations**

Wage Rate Determinations

The Agency determined the wage rate from mean hourly wage earnings to represent the cost of employee time. For the relevant standard occupational classification category, OSHA used the wage rates reported in the Bureau of Labor Statistics, U.S. Department of Labor, Occupational Employment Statistics (OES), May 2017 [date accessed: November 20, 2018]. (OES data is available at: <https://www.bls.gov/oes/tables.htm>. To access a wage rate, select the year, "Occupation Profiles," and the Standard Occupational Classification (SOC) code.)

To account for fringe benefits, the Agency used the Bureau of Labor Statistics' (BLS) *Occupational Employment Statistics (OES) (2017)*. Fringe markup is from the following BLS release: *Employer Costs for Employee Compensation* news release text; Released 10:00 AM (EDT), September 18, 2018 (<https://www.bls.gov/news.release/pdf/ecec.pdf>). BLS reported that

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for civilian workers, fringe benefits accounted for 31.7 percent of total compensation and wages accounted for the remaining 68.3 percent. To calculate the loaded hourly wage for each occupation, the Agency divided the mean hourly wage by 68.3 percent.

<b>WAGE HOUR ESTIMATES</b>				
<b>Occupational Title</b>	<b>Standard Occupational Code</b>	<b>Mean Hour Wage Rate<sup>1</sup></b>	<b>Wage Percent<sup>2</sup></b>	<b>Loaded Hourly Wage Rate</b>
Occupational Safety and Health Specialist and Technician	29-9010	\$33.71	.683	\$49.36

Based on previous National Safety Stand-Downs, OSHA estimates that approximately 4,500 employers<sup>3</sup> will complete the survey. OSHA estimates that an employee making \$49.36 will take 10 minutes (10/60) to complete the survey.

Burden Hours:  $4,500 \times 10/60$  hours = 750 hours

Cost: 750 hours x \$49.36 = \$37,020

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1 Source: Occupational Employment Statistics. U.S. Department of Labor, Bureau of Labor Statistics, May 2017.

2 Source: Employer Costs for Employee Compensation, Supplementary Table 2. U.S. Department of Labor, Bureau of Labor Statistics, June 2018.

3 Private sector, statelocal, and tribal governments.

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<b>Estimated Annualized Respondent Hour and Cost Burden Table</b>								
<b>Information Collection Requirement</b>	<b>Type of Respondent</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Total Number of Responses</b>	<b>Average Burden per Response (In Hrs.)</b>	<b>Total Burden Hours</b>	<b>Avg. Hourly Wage Rate*</b>	<b>Total Burden Costs</b>
<b>Survey</b>	Occupational Safety & Health Specialist & Technician	4,500	1	4,500	10/60	750	\$49.36	\$37.020



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

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve 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 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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

**FEDERAL COST:**

Grade of evaluator	GS 12 step (6)
Hourly rate <sup>4</sup>	\$45.59
Estimated responses	4,500
Time to evaluate each response	5 minutes (5/60)
Total estimated time	375 hours

Cost 375 hours X \$45.59 = \$17,096

**15. Explain the reasons for any program changes or adjustments reporting in Items 12 or 13.**

The National Safety Stand-Down to Prevent Falls in Construction is a new Information Collection.

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

The information/data compiled from the survey will be published in the Annual Falls Stand-Down Report. The information will be analyzed and the report posted on the OSHA webpage.

**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.**

OSHA will display the expiration date for OMB approval for the information collection.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission."**

OSHA is not seeking an exemption to the certification statement.

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<sup>4</sup> [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf)