

**Note to Reviewer of 1220-0045**

October 2018

As part of BLS research into possible ways to use OSHA-collected data, BLS proposes collecting the OSHA-assigned establishment identification number on a voluntary basis from SOII internet respondents required to submit data to OSHA and to BLS. This identification number will be used to improve matching OSHA data and BLS data. BLS and OSHA also continue to work together to explore technological solutions to reduce duplicative burden, including changes to the collection systems for both and the possibility of data sharing from OSHA to BLS on a flow basis.

The HSOII feasibility test is now complete and the burden related to that collection has been removed.

The following supporting statement has been updated to reflect the current work on these efforts.

SUPPORTING STATEMENT, Part A  
Survey of Occupational Injuries and Illnesses  
**Approved April 2017: Updated for the Household Survey of  
Occupational Injuries and Illnesses Pilot Test**

**Approved April 2018: Updated for One year extension request for  
further research into combining OSHA data with the SOII**

**October 2018: Updated for revision request to include OSHA  
establishment identification number and completion of the HSOII**

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.

This extension is being requested for a third year of clearance in addition to the two years initially granted for Survey of Occupational Injuries and Illnesses (SOII) collection. BLS and OSHA have collaborated to examine and best leverage the administrative data resulting from the OSHA final rule to 'Improve Tracking of Workplace Injuries and Illnesses' (29 CFR Parts 1904 and 1952). Initial feasibility assessments for using OSHA administrative data have been performed. Additional information about this can be found in section 4.

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 2019 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.

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.

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 2018, 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:

Crop Production (NAICS 111)  
Transportation Equipment Manufacturing (NAICS 336)  
Food and Beverage Stores (NAICS 445)  
Truck Transportation (NAICS 484)  
Amusement, Gambling, and Recreation Industries (NAICS 713)  
Food Services and Drinking Places (NAICS 722)

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 has been used since. 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. At the close of Survey Year 2017 collection, 151,517 establishments responded via the IDCF and have submitted 240,286 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 amended its recordkeeping regulations to require employers in selected industries to submit selected injury and illness information electronically. OSHA developed the Injury Tracking Application (ITA) to collect records. Currently, OSHA is collecting information from the OSHA 300A Summary form from all covered employers. 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. Some establishments in private industry are required to report to both the SOII and OSHA under the proposed rule.

At the time that OSHA amended their recordkeeping rules, OMB requested that BLS evaluate 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 covers 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. The final timing of the collection of the OSHA ITA records may pose challenges to incorporation of these records in SOII estimates.

It is important to BLS that the identities of establishments 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. At this point, OSHA has not requested approval for the collection of EIN.

BLS continues to examine the use of administrative data in combination with survey collected data to produce estimates. As part of this effort, BLS is reviewing all available OSHA collected electronic data, including preliminary data from collected from the ITA as well as data from OSHA's severe injury tracking system. Initial research linking the SOII sample frame to OSHA severe injury data suggests that linkage would benefit from additional information such as EIN. Additionally, key data elements such as industry may appear differently in the SOII and OSHA records, suggesting some challenges in combining the two data sources. Additional work linking SOII data to currently available OSHA collected records is ongoing. Also, BLS has funded research to develop proposals to combine OSHA records with SOII data. A final report on proposed methodology is expected in the third quarter of 2018.

OMB also requested that the BLS and OSHA work together as the ITA electronic data collection application was developed to minimize any increased burden on employers. From 2016 through February 2017, BLS and OSHA formed a working group to examine ways to reduce duplicative burden where possible. BLS and OSHA were largely able to align OSHA electronic collection with the SOII and BLS shared electronic data collection expertise.

Summary records from the OSHA 300A form became available in July 2017 and final OSHA collection of RY2016 records concludes December 31<sup>st</sup>, 2017. Case-specific data from the OSHA form 301 are not currently collected and it is unclear when they would be.

Given the uncertainty surrounding what OSHA collected data will look like in the next few years, and the challenges BLS faces, BLS requested that SOII be granted the third year of clearance, which was granted on June 18, 2018. BLS will continue its

research into evaluating using OSHA-collected ITA data as an input to SOII estimates.

As part of BLS research into possible ways to use OSHA-collected data, BLS proposes collecting the OSHA establishment identification number on a voluntary basis from SOII internet respondents required to submit data to OSHA and to BLS. This identification number will be used to improve matching OSHA data and BLS data. BLS and OSHA also continue to work together to explore technological solutions to reduce duplicative burden, including changes to the collection systems for both and the possibility of data sharing from OSHA to BLS on a flow basis.

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.

SOII collects similar occupational injury and illness data from businesses, as do the Mine Safety and Health Administration and the Federal Railroad Administration. Also, the Occupational Safety and Health Administration (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. These data, collected from establishments, are

likely subject to underreporting and the data collected by the Pilot HSOII is intended to test if collection from workers directly can be a compliment to the establishment data currently being collected.

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 S0II 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.

### **Collection of OSHA Establishment number**

A 30 day notice was published seeking comments on the collection of the OSHA establishment identification number from SOII internet respondents.

#### 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. Per the Cybersecurity Enhancement Act of 2015, Federal Information systems are protected from malicious activities through cybersecurity screening of transmitted data.*

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 2019 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 on 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 11 minutes per case, the total burden for Part 2 is 55,000 hours [(300,000 cases x 11 minutes)/60 = 55,000 hours].

Form 9300 - Part II

Sector	Days away from work cases and days of job transfer or restriction pilot cases	Hours



Private	255,000	46,750
Public (mandatory)	37,500	6,875
Public (voluntary)	7,500	1,375
Total	300,000	55,000

The BLS further estimates that the approximately 92,000 private sample units and 13,000 public that have responsibility to report to OSHA and to the BLS will spend approximately 2 minutes on average reporting the OSHA ITA establishment identification number.

Sector	Sample Units	Hours
Private	92,000	3,067
Public (mandatory)	13,000	434
Total	105,000	3,501

Total burden for the survey data collection Form 9300 is, therefore, 95,000 hours (40,000 + 55,000). The average reporting burden is then 24 minutes or .4 hours per respondent [95,000 hours/240,000 sample units = 0.4 hours per sample unit]. The addition of the collection of the OSHA establishment identification number increases the total burden for the survey data collection Form 9300 to 98,501 hours (95,000 + 3501).

Sector	Hours
Private	86,484
Public (mandatory)	9,476
Public (voluntary)	2,541
Total	98,501

Reporting Burden for SOII Pre-notification Recording.

Recording burden for normally exempt employers who are pre-notified 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 days of job transfer or restriction pilot cases	Log hours	Incident report hours
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 (98,501) on the BLS Form 9300 is 319,001 hours.

Sector	Sample units	Hours
Private	220,000	296,651(36,667+46,750+210,167+3,067)
Public (mandatory)	13,000	9,476 (2,167+6,875+434)
Public	7,000	12,874(1,166+1,375+10,333)

(voluntary )		
Total	240,000	319,001

SOII Burden Hours for SY 2016 through SY 2018.

Year	Sector	Reporting	Recording	Total Burden	Total cost
2016	Private	83,417	210,167	293,584	\$ 7,131,155
	Public (m)	9,042	--	9,042	\$ 219,630
	Public (v)	2,541	10,333	12,874	\$ 312,709
	Total	95,000	220,500	315,500	\$ 7,976,404
2017	Private	83,417	210,167	293,584	\$ 7,131,155
	Public (m)	9,042	--	9,042	\$ 219,630
	Public (v)	2,541	10,333	12,874	\$ 312,709
	Total	95,000	220,500	315,500	\$ 7,976,404
2018	Private	86,484	210,167	296,651	\$ 7,778,189
	Public (m)	9,476	--	9,476	\$ 248,461
	Public (v)	2,541	10,333	12,874	\$ 337,556
	Total	98,501	220,500	319,001	\$ 8,364,206

Respondent cost for the SOII (Private Sector) is estimated at \$7.131 million based on an employer cost of \$24.29 an hour (296,651 \* \$26.22= approximately \$7.778 million). With the addition of state and local government units, this respondent cost is estimated at \$8.364 million based on an employer cost of \$24.29 an hour (319,001 \* \$26.22 = approximately \$8.364 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: June 2018.

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.

**Addition of collection of OSHA Establishment Number and completion of the HSOII**

The addition of the collection of the OSHA establishment number will increase current burden hours by 3,501 hours. The completion of the HSOII will decrease burden by 1,144 hours.

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.  
November -Industry rates and counts and characteristics of injured/ill workers and circumstances of work place injuries and illnesses issued in news release and released on the 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.