

**SUPPORTING STATEMENT**  
**Industry-Recognized Apprenticeship Programs Accrediting Entity Information**  
**OMB Control Number 1205-0NEW**

**A. Justification.**

The U.S. Department of Labor (Department) is submitting this new Information Collection Request (ICR) to permit the Department’s issuance of a new information-collection instrument in connection with recently published Departmental guidance on the development of industry-recognized apprenticeship programs, established pursuant to the statutory authority provided under the National Apprenticeship Act of 1937, 29 U.S.C. § 50. As noted below, the submission of this PRA package will be followed by a related submission to OMB relating to the promulgation of a revised regulation of 29 CFR part 29 that will facilitate the establishment of industry-recognized apprenticeship programs.

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.*

The National Apprenticeship Act of 1937 (29 U.S.C. § 50) authorizes the Department “to formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices,” as well as to “to bring together employers” for the formulation of programs of apprenticeship. To implement this mandate, the Department has previously issued regulations (revised most recently in 2008) governing Labor Standards for the Registration of Apprenticeship Programs (at 29 CFR part 29), as well as regulations (revised most recently in 2016) governing Equal Employment Opportunity in Apprenticeship (at 29 CFR part 30). These regulatory provisions provide minimum national standards of apprenticeship that protect the welfare of apprentices and promote equal opportunity in apprenticeship.

On June 15, 2017, President Trump issued Executive Order 13801 (82 FR 28229), titled “Expanding Apprenticeships in America,” which directed the Secretary of Labor (in consultation with the Secretaries of Education and Commerce) to consider “proposing regulations, consistent with applicable law, including 29 U.S.C. 50, that promote the development of apprenticeship programs.” The Executive Order also directed the Department to determine how qualified accreditors may provide recognition to “industry-recognized apprenticeship programs” and “establish guidelines or requirements that qualified [accreditors] should or must follow to ensure that the industry-recognized apprenticeship programs they recognize meet quality standards.” Accreditors of these programs may include trade and industry groups, companies, non-profit organizations, unions, and joint labor-management organizations.

Executive Order 13801 also established a Task Force on Apprenticeship Expansion (the Task Force), which was convened in November of 2017 for the purpose of identifying “strategies and proposals to promote apprenticeships, especially in sectors where apprenticeship programs are insufficient.” On May 10, 2018, the Task Force submitted its final report to President Trump, which included 26 recommendations for expanding high-quality apprenticeships that lead to family-sustaining careers.

The Department moved forward with guidance that will accelerate the creation of the industry-recognized apprenticeship programs contemplated by the Executive Order and endorsed by the Task Force. On July 27, 2018, the Department’s Employment and Training Administration (ETA) issued

interim guidance on eligible industry-recognized apprenticeships through Training and Employment Notice 3-18 (TEN), which is incorporated by reference in the form, available at: [https://wdr.doleta.gov/directives/attach/TEN/TEN\\_3-18.pdf](https://wdr.doleta.gov/directives/attach/TEN/TEN_3-18.pdf). Drawing heavily on the Task Force's recommendations, TEN 3-18 sets out, at a high level, the policies and procedures that accrediting entities<sup>1</sup> will be expected to have in place to evaluate and accredit quality industry-recognized programs, monitor program outcomes, and report results. These accrediting entities, in turn, may request a favorable determination from the Department concerning their qualifications to act as an industry-recognized apprenticeship program accreditor.

The TEN was issued by the Department as an interim informational document pending a rulemaking to amend 29 CFR part 29. Pending such an amendment, the TEN is intended to provide potential accreditors of industry-recognized programs with a general overview of the quality standards that an entity should satisfy in order to improve their chances for obtaining a favorable determination letter from the Department concerning their qualifications to act as a program accreditor. To obtain a favorable determination from the Department, the entity should demonstrate, among other things, that it has received broad sector-wide input and consensus in the setting of industry-wide quality standards. The accrediting entity should also demonstrate that its accreditation process is consistent with Department-identified hallmarks of high-quality apprenticeship programs.

To obtain the data necessary for the Department to determine whether the entity accrediting these industry-recognized programs has satisfied those criteria, the Department proposes the development of a reporting and information collection vehicle. This instrument, titled "Industry-Recognized Apprenticeship Programs Accrediting Entity Information," is a form that will enable the Department to determine whether the entity's standards meet the criteria outlined in the TEN. An electronic version of this information collection form (see attachment) will be posted on the Department's website and will be capable of being completed and submitted online. Information collected by the Department on this form from approved accrediting entities will be made available to the public through the Department's website at [www.apprenticeship.gov](http://www.apprenticeship.gov), so that individuals and organizations can connect with approved accrediting entities and readily assess the quality of these industry-recognized apprenticeship programs.

The Department will not assume a direct regulatory or oversight role over industry-recognized apprenticeship programs. Accordingly, the quality of these apprenticeship programs will be evaluated by accrediting entities; these accrediting entities in turn will be assessed by the Department to determine whether their program and standards meet the criteria described in the TEN. In addition, industry-recognized apprenticeship programs will not need to register with the Department under the existing procedure outlined in 29 CFR part 29 or with State Apprenticeship Agencies. However, as noted previously, the Department is considering proposing amendments at a later date to 29 CFR part 29. The Department anticipates the amendments will, among other things, establish guidelines and requirements for accreditors, and may also enable streamlined registration for industry-recognized programs under the existing Registered Apprenticeship framework.

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<sup>1</sup> Please note that the projected duties of program "certifiers" (as referenced in TEN 3-18) in assessing the quality and rigor of industry-recognized apprenticeship programs are the same job functions traditionally performed by accreditation bodies. Accreditation is a statement from an accreditation body – an independent organization that oversees the development of voluntary consensus standards – declaring that another entity offering credentials, education, and/or training within a program (such as an industry-recognized apprenticeship program) has met specified certification standards. Additional information on accreditation bodies can be found at the website of the American National Standards Institute: [https://www.standardsportal.org/usa\\_en/resources/USAccreditation\\_bodies.aspx](https://www.standardsportal.org/usa_en/resources/USAccreditation_bodies.aspx). The Department is considering elaborating further upon these accreditation duties when amending 29 CFR part 29.

The concepts introduced by the first accreditors and industry-recognized apprenticeship programs will influence how the Department revises and streamlines its apprenticeship-related regulations and shapes new initiatives in this area.

- 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.*

The representations and information collected through the form titled “Industry-Recognized Apprenticeship Programs Accrediting Entity Information,” will enable the Department to acquire information regarding the quality of the plans and processes of a potential accreditor of industry-recognized apprenticeship programs under Training and Employment Notice 3-18.

If the information collection described herein are approved, the Department will continue to monitor the quality and practical utility of the information yielded from this form. As this is a new information collection, the Department may find it necessary to submit non-material change requests to clarify the requirements. Any substantive changes would, of course require revising the ICR. \_

- 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.*

ETA intends to relieve paperwork burdens by providing submitters of the form an electronic version of this form that they can fill out on ETA’s website, as well as the option of submitting the form in paper. The online option ensures that the information collection process is consistent with the purposes and requirements of both the Government Paperwork Elimination Act (GPEA) and the E-Government Act.

- 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.*

While the Department currently collects data from registered apprenticeship programs, the industry-recognized apprenticeships described in President Trump’s Executive Order and in TEN 3-18 constitute a new government initiative for expanding apprenticeships, particularly in those occupations and sectors where apprenticeship programs are not currently widespread. Industry-recognized apprenticeship programs would not be registered with the Department, but rather would complement the existing registered system. Accordingly, the various recordkeeping and reporting requirements that will be created under the guidance and information collection instrument sought through this ICR are not duplicated elsewhere.

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

Because all of the information being collected by the form is necessary to assess the capabilities of

potential accrediting entities (which could include small businesses or other small entities), the burden on these accrediting entities cannot be readily minimized, regardless of size. However, small businesses and entities - as well as other applicants - will be afforded the option to file the proposed information collection in paper form, or electronically through a fillable online form

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.*

If authorization to collect the foregoing information on a voluntary basis were not granted, the Department would be unable to determine whether accreditors have processes consistent with the hallmarks of quality accreditors as described in TEN 3-18. The Department would find it easier to measure the performance and outcomes of industry-recognized apprenticeship programs if it had access to the accreditor supplied data. Such information would allow prospective program sponsors and apprentices to make informed judgments concerning the quality of such programs.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner that implicates the special circumstances listed in regulations 5 CFR 1320.5.*

These data collection efforts do not involve any special circumstances.

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.*

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to comment on the *Federal Register* Notice published on September 20, 2018 (83 FR 47643). The comment period ended on November 19, 2018. The Department received 33 public comments in response to the notice. All comments were reviewed and analyzed but some were not germane as they did not provide recommendations or feedback on the specific information collection instrument covered under OMB Control Number 1205-0NEW nor did they adhere to the scope of comments requested in the notice published in the *Federal Register*.

A summary of all germane comments received and the Department's responses can be found in Appendix A. Full comments are available at: <https://www.regulations.gov/docketBrowser?rpp=25&so=DESC&sb=commentDueDate&po=0&dct=PS&D=ETA-2018-0001>.

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

This information collection does not involve payments to respondents.

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

The form will not require the disclosure by the accreditors of industry-recognized apprenticeship programs (nor from industry-recognized program sponsors) of personally identifiable information about apprentices (such as the individualized salary information or social security numbers of such persons). Rather, this form seeks to obtain program-level information from accreditors concerning general industry-recognized apprenticeship program characteristics and outcomes. The form includes standard language on confidentiality. Under this collection, the name of a potential accreditor will be posted at: [www.apprenticeship.gov](http://www.apprenticeship.gov) if the U.S. Department of Labor issues a favorable determination letter with respect to the entity. While information collected by this form is generally subject to public disclosure under the Freedom of Information Act (FOIA), Exemption #4 of FOIA (at 5 U.S.C. §552(b)(4)) affords protection to submitters who are asked to furnish commercial or financial information to the Federal Government (such as the potential accreditors of industry-recognized apprenticeship programs) by safeguarding them from the competitive disadvantages that could result from disclosure.

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.*

No questions of this nature are posed on the foregoing information collection forms.

12. *Provide estimates of the hour burden of the collection of information.*

### **Estimated Number of Respondents to the Information Collection “Industry-Recognized Apprenticeship Programs Accrediting Entity Information”**

The industry-recognized apprenticeship programs contemplated under both the Executive Order and the Department’s TEN constitute a significant additions to departure from the traditional Registered Apprenticeship program model. Accordingly, providing a reliable estimate of the annual number of respondents from whom the Department expects to collect relevant information concerning these new types of apprenticeship programs (namely, estimating the number of putative program accreditors) constitutes a significant analytical challenge. For purposes of this estimate, the Department believes the most reliable guidepost for estimating the number of accrediting entities that would annually submit the proposed form is the number of entities that submitted grant applications in fiscal year 2016 under the Office of Apprenticeship’s American Apprenticeship Initiative (AAI) grants program.

Like industry-recognized apprenticeship programs, the AAI grant program was designed to encourage the development of innovative, groundbreaking approaches to apprenticeship-program development on the part of a wide cross-section of groups, including private-sector employers, labor unions, educational institutions, and not-for-profit organizations. In the four months during which AAI grant applications were accepted, the Office of Apprenticeship received 191 applications for grants from the intended cross-section of program sponsors and innovators. While the accreditors of industry-recognized apprenticeship programs described herein will not receive federal grants to develop these programs, it should be noted that the 191 AAI applicants did encompass a level of diversity in terms of geography, industry sector, and apprenticeship-program design that the Department anticipates will be replicated in the industry-recognized program context.

Starting with this figure of 191 AAI grantee applicants as a reasonably analogous baseline (and rounding this figure slightly upwards to 200 to provide for ease of estimation), the Department then adjusted the figure 50% higher to account for its planned efforts to promote industry-recognized apprenticeship programs in the private sector. Accordingly, the Department estimates that it will receive responses from approximately 300 potential program accrediting entities. The Department further estimates that it will provide a favorable determination to approximately 25% (75 out of 300) of these anticipated accreditor applicants, which is roughly the same proportion of AAI grantee applicants (46 out of 191) that were approved by the Department for grant awards in fiscal year 2016.

**a. Description of the information collection instrument (Industry-Recognized Apprenticeship Programs Accrediting Entity Information)**

Anticipated Designated Responders to the Collection Instrument, and Their Compensation Rate: \_\_\_\_\_

The Department anticipates that this new form will be completed by Training and Development Managers employed by accrediting entities. According to the Department’s Bureau of Labor Statistics (BLS), the estimated mean annual wage (base wage) for Training and Development Managers as of May of 2017 was \$117,690.00; BLS also estimated that the mean hourly wage (base wage) for Training and Development Managers in May 2017 was \$56.58 (source: <https://www.bls.gov/oes/current/oes113131.htm>). Based on data from BLS’s “Employer Costs for Employee Compensation” release (<https://www.bls.gov/ect>), the percentage of an employee’s total compensation package that consisted of employee benefits averaged 46% over the past year. In addition, total related overhead costs are estimated to comprise an additional 54% of the applicable base wage (source: *Guidelines for Regulatory Impact Analysis, 2016*, published by the U.S. Department of Health and Human Services, at the following website: [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf)). Accordingly, the total hourly compensation rate for Training and Development Managers (adjusted to include employee benefits and overhead costs) is estimated to be \$113.16 (\$56.58 hourly base wage + \$26.03 in employee benefits + \$30.55 in overhead costs).

**Estimated Time to Complete Form Elements:**

The Industry-Recognized Apprenticeship Programs Accrediting Entity Information form consists of the following six sections:

Section I	Accrediting Entity Identifying Information
Section II	Capabilities and Experience of the Accrediting Entity
Section III	Evaluating and Overseeing Elements of a High-Quality Apprenticeship Program
Section IV	Policies and Procedures
Section V	Additional Representations of Program Quality by the Accrediting Entity
Section VI	Attestation

**Time to Complete Section I—Accrediting Entity Identifying Information:** (2 hours per accreditor)

The estimated average response time for the accreditor to provide accrediting entity identifying information requested in this section is approximately 2 hours. This estimate includes the time to gather and attach the documentation for this section.

**Time to Complete Section II—Capabilities and Experience of the Accrediting Entity:** (2 hours per accreditor)

The estimated average response time for the respondent to describe their operations, capabilities, experience, and qualifications to be an accreditor is approximately 2 hours. This estimate includes the time to gather the documentation to be included in the subsections listed below.

A. Organizational Operational Information: (1 hour per accreditor)

It is estimated to take 1 hour per accreditor to summarize their entity's operations.

B. Organizational Qualifications: (1 hour per accreditor)

It will take approximately 1 hour for the respondent to describe their qualifications to serve as an accreditor and to gather and attach relevant documentation.

**Time to Complete Section III—Evaluating and Overseeing Elements of a High-Quality Apprenticeship Program:** (16 hours per accreditor)

The estimated average response time for the accreditor to provide information concerning the elements of their high-quality apprenticeship program requested in this section is approximately 16 hours. This estimate includes the time to gather the documentation to be included in the subsections listed below.

A. Paid Work Component: (1 hour per accreditor)

It will take approximately 1 hour to describe what wages apprentices will be paid and under what circumstances wages will increase. Each accreditor must address how the program(s) it accredits will provide participants the opportunity to gain upward mobility in the industry.

B. On the Job Instruction/Work Experience: (1 hour per accreditor)

On average, it should take 1 hour for an accreditor to outline the structured work experiences and mentoring opportunities for apprentices enrolled in their program(s).

C. Classroom Instruction, Educational Partners, and Educational Credentials: (5 hours per accreditor)

It is estimated that this section will take 5 hours to complete. This includes a detailed explanation on how the apprenticeship programs will provide or arrange for classroom or related instruction that is high-quality and adequate to help apprentices achieve their proficiency goals, earn credentials or certifications. This section includes the attachment of documentation about educational partners or vendors of related instruction.

D. Occupations and Occupational Credentials: (5 hours per accreditor)

For purposes of this estimate, the Department has assumed an average of ten accredited occupations per accreditor, it will take approximately 30 minutes per occupation to complete the requirements of this section for a total of 300 minutes (10 occupations × 30 minutes). For each occupation, accreditors will describe in detail the industry credential(s) that an apprentice will earn upon completing an accredited apprenticeship program. Accreditors should ensure that a portable industry credential(s) will be provided by the accredited apprenticeship program(s) and describe the portable benefits that such credential(s) are expected to confer.

E. Equal Employment Opportunity (EEO) Requirements: (4 hours per accreditor)

It will take approximately 4 hours for each accreditor to describe policies and procedures that the accrediting entity will adopt to verify the industry-recognized apprenticeship program(s) adhere to all applicable EEO laws and regulations. This includes outreach strategies to reach diverse populations and steps to keep the workplace free from harassment, intimidation, and retaliation.

**Time to Complete Section IV—Policies and Procedures:** (13 hours per accreditor)

The estimated average response time for the accreditor to provide information concerning their proposed general processes, policies, and procedures for accrediting and overseeing industry-recognized apprenticeship programs requested in this section is approximately 13 hours. This estimate includes the time to gather the documentation to be included in the subsections listed below.

A. General Accreditation Process (4 hours per accreditor)

It is estimated to take 4 hours to describe the entity's proposed general processes, policies, and procedures for accrediting and overseeing high-quality industry-recognized apprenticeship programs.

B. Data and Records Collection, Management and Retention (5 hours per accreditor)

It is estimated to take 5 hours to describe the approach the entity will take to collect and report data on the accreditation program and to retain and make performance data available to the public.

**NOTE:** The time to document to support a substantive change to an approved accreditor's process as outlined in this section is not included in this sections time estimate. This time estimate is as follows: Approximately 10 percent (8 accreditors) of the 75 approved accreditors are expected to make a substantive change to their accreditation process that will require approval from the Department. The time to modify documents is likely to take on average **ten hours** to complete for a total burden of 80 hours (8 accreditors × 10 hours).

C. Accreditor and Accreditation Integrity (4 hours per accreditor)

It is estimated to take 4 hours to describe the approach the entity will take to ensure transparency, accountability, impartiality, confidentiality, objectivity, and independence to maintain a high-quality program.

**Time to Complete Section V—Additional Representation of Program Quality by the Accrediting Entity:** (5 minutes per accreditor)

It will take five minutes for each accreditor to read and attest additional representations of program quality. It should be noted that this form does not require the submittal of performance metrics to the Department. The reporting of data will be handled in a separate PRA collection included in the future notice of proposed rulemaking (NPRM).

**Time to Complete Section VI—Attestation:** (5 minutes per accreditor)

To review the application for completeness and to sign we estimate it will take approximately five minutes.

**Burden Summary Table**

Form	Number of Respondents	Frequency	Total Annual Response	Time Per Response (Average)	Total Annual Burden (Hours)	Hourly Rate	Monetized Value of Respondent Time
Section I	300	1-time basis annually	300	2 hrs./ Accreditor	600	\$113.16	\$67,896
Section II	300	1-time basis annually	300	2 hrs./ Accreditor	600	\$113.16	\$67,896
Section III	300	1-time basis annually	300	16 hrs./ Accreditor	4,800	\$113.16	\$543,168
Section IV	300	1-time basis annually	300	13 hrs./ Accreditor	3,900	\$113.16	\$441,324
Section V	300	1-time basis annually	300	5 min./ Accreditor	25	\$113.16	\$2,829
Section VI	300	1-time basis annually	300	5 min./ Accreditor	25	\$113.16	\$2,829
*Substantive Change	8	1-time basis annually	8	10 hrs./ Accreditor	80	\$113.16	\$9,053
<b>Unduplicated Totals</b>	<b>300</b>		<b>308</b>		<b>10,030</b>	<b>\$113.16</b>	<b>\$1,134,995</b>

\*Documentation of a substantive change as described in Section IV, Subsection B for eight approved accreditors

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting

*from the collection of information.*

There are no additional costs to respondents other than the value of respondent time captured in item 12.

14. *Provide estimates of annualized costs 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.*

The following narrative summarizes the estimated annualized costs to the Office of Apprenticeship of the U.S. Department of Labor's Employment and Training Administration (ETA) in connection with processing and reviewing the information collections described in this submission:

### **Step 1: Processing by Program Analysts**

It is anticipated that the initial intake, review, and analysis of the information provided to the Department by accrediting entities will be conducted by a Program Analyst in ETA's Office of Apprenticeship, each of whom is a full-time federal employee. The burden to the Federal Government of this review is based on the GS-13, Step 5 Federal government base wage compensation of \$109,900 per year for these Program Analysts (based on the January 2018 locality pay for the Washington, D.C. metropolitan area for federal employees at that pay level, see <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB.pdf>); the corresponding hourly base pay for these Program Analysts GS-13, Step 5 level is \$52.66 per hour (see [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)). Based on the most recent data available from the Congressional Budget Office (CBO), the Department estimates that the percentage of federal employees' total compensation that consists of employee benefits is 69% (see [www.cbo.gov/publications/52637](http://www.cbo.gov/publications/52637)). In addition, total related overhead costs are estimated to comprise an additional 54% of the applicable base wage (source: *Guidelines for Regulatory Impact Analysis, 2016*, published by the U.S. Department of Health and Human Services, at the following website: [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf)). Accordingly, the total hourly compensation rate for a Program Analyst (adjusted to include employee benefits and overhead costs) is estimated to be \$117.44 per hour (\$52.66 hourly base wage + \$36.34 in employee benefits + \$28.44 in overhead costs).

The Department further estimates that each Program Analyst will take an average of one hour to review and analyze the information that is contained in each of the foregoing information collection forms. Accordingly, the total annualized cost for a Program Analyst to process the estimated 300 submissions from potential accreditors multiplied by 1.0 hour processing time for each form, will result in 300 Program Analyst processing hours, resulting in a total annual cost of \$35,232 (300 hours × \$117.44).

### **Step 2: Review Process by Panel**

Applications that the initial Program Analyst review and deem to be satisfactory will be forwarded to a review panel consisting of 1-2 Program Analysts and 2-3 Training and Development Managers for review and recommendation for approval by the Office of Apprenticeship Administrator. It is anticipated that the initial review process will result in a disqualification of 10 percent (30 applications) of the applications, leaving an estimated 270 applications to be reviewed during Step 2. The estimated time to conduct a complete review of each accreditor's application is eight hours. This equates to 2,160 hours (8 hours × 270 applications).

The hourly compensation for a Program Analyst is \$117.44 as stated above. Additionally, the hourly compensation for a Training and Development Manager is \$113.16 as stated above.

Accordingly, the total annualized cost for the panel consisting of, on average, two Program Analysts and two Training and Development Managers to review the estimated 270 applications is \$996,192. The cost for a Program Analyst to review applications is \$253,670 ( $\$117.44 \times 2,160$  hours). The cost for a Training and Development Manager to review applications is \$244,426 ( $\$113.16 \times 2,160$  hours). These cost estimates need to be multiplied by two to represent a panel consisting of four members.

### **Step 3: Panel Recommendations for Approval**

It is expected that the panel will meet on a consistent basis to discuss their review findings for each application. This process should take approximately one hour per application for a total of 270 hours. Assuming a four-person panel, the cost of this process is \$124,524. The cost for a Program Analyst is \$31,709 ( $\$117.44 \times 270$  hours). The cost for a Training and Development Manager is \$30,553 ( $\$113.16 \times 270$  hours). These cost estimates need to be multiplied by two to represent a panel consisting of four members.

### **Step 4: Approval by Office of Apprenticeship Administrator**

After initial intake and review by a Program Analyst and subsequent analysis by the review panel, applications deemed satisfactory will be sent to the Office of Apprenticeship's Administrator for final review and approval. The Administrator of the Office of Apprenticeship (who is a member of the Senior Executive Service, or SES) will reach a final determination concerning whether a particular entity should receive a favorable determination from the Department concerning its qualifications to accredit industry-recognized programs. The burden to the Federal Government of this final review process is based on the base salary of a federal employee at Level IV of Senior Executive Service, which is set at \$164,200 per annum for calendar year 2018 (per 5 U.S.C. § 5382); the corresponding hourly base pay for an SES at this level is \$78.94 per hour ( $\$164,200 \div 2,080$  hours). Based on the most recent data available from CBO, the Department estimates that the percentage of federal employees' total compensation that consists of employee benefits is 69% (see [www.cbo.gov/publications/52637](http://www.cbo.gov/publications/52637)). In addition, total related overhead costs are estimated to comprise an additional 54% of the applicable base wage (source: *Guidelines for Regulatory Impact Analysis, 2016*, published by the U.S. Department of Health and Human Services, at the following website: [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf)). Accordingly, the total hourly compensation rate for the Administrator (adjusted to include employee benefits and overhead costs) is estimated to be \$176.04 per hour ( $\$78.94$  hourly base wage +  $\$54.47$  in employee benefits +  $\$42.63$  in overhead costs).

The Department estimates that the panel will approve the qualifications of approximately 25% (75 out of 300) of these anticipated accreditor applicants, which is roughly the same proportion of AAI grantee applicants (46 out of 191) that were approved by the Department for grant awards in fiscal year 2016.

The Department further estimates that the Administrator of the Office of Apprenticeship will take an average of 15 minutes to review each of the 75 applications (18.75 hours) the panel recommended for a final determination regarding whether the entity is qualified to accredit industry-recognized apprenticeship programs. Accordingly, the total annualized cost for the Administrator's review is \$3,301 ( $\$176.04 \times 18.75$  hours).

The cost to develop and maintain the online form/website to gather and track information for this collection, including the one-time development costs (software and labor) is estimated at \$608,500. The online collection will allow potential accreditors to effectively respond to this collection. The annual maintenance cost is expected to be approximately \$125,000 since the website will be hosted as part of a larger contract.

**Total Federal Government Burden:**

<b>Federal Employee Job Title</b>	<b>Number of Forms to Process per Year</b>	<b>Time Per Form (Average)</b>	<b>Total Annual Burden (Hours)</b>	<b>Total Hourly Rate</b>	<b>Monetized Value of Respondent Time</b>
Step 1: Program Analyst (GS-13, Step 5)	300	1 hrs./ Application	300	\$117.44	\$35,232
Step 2: Program Analyst (GS-13, Step 5) *	540	8 hrs./ Application	4,320	\$117.44	\$507,341
Step 2: Training and Development Manager*	540	8 hrs./ Application	4,320	\$113.16	\$488,851
Step 3: Program Analyst (GS-13, Step 5) *	540	1 hrs./ Application	540	\$117.44	\$63,418
Step 3: Training and Development Manager*	540	1 hrs./ Application	540	\$113.16	\$61,106
Step 4: Administrator (SES, Level IV)	75	0.25 hrs./ Application	18.75	\$176.04	\$3,301
One Time Development Cost					\$608,500
Annual Maintenance Cost					\$125,000
<b>Total</b>					<b>\$1,892,749</b>

\*These totals account for two persons

**GRAND TOTAL OF FEDERAL COST BURDEN:      \$1,892,749**

15. *Explain the reasons for any program changes or adjustments reported on the burden worksheet.*

This 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 action.*

Summary information is used to respond to requests from senior management, Congress, public interest groups, the apprenticeship sponsor community, and the general public. After accreditors are approved by the Department, information about their program will be posted on the Department's website so that individuals can readily assess the quality of these industry-recognized programs.

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

ETA is not requesting a waiver for the display of the OMB expiration date.

18. *Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."*

There are no exceptions to the certification statement.

## **B. Collections of Information Employing Statistical Methods**

This collection of information does not employ statistical methods.