

**SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS IN
OSHA'S ALLIANCE PROGRAM
Office of Management and Budget (OMB)
Control Number 1218-0NEW (May 2019)**

Note to Reviewer: This proposed new information collection is associated with OSHA's Alliance Program. The Agency created the Alliance Program in 2002 as a structure for working with groups that are committed to worker safety and health. The total burden hours for the information collection requirements contained in the proposed ICR would result in a total program change (increase) of 14,122 hours.

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 1 of the Occupational Safety and Health Act of 1970 (the "OSH Act") provides that the OSH Act's purpose is to assure safe and healthful working conditions for working men and women by, among other things, providing for research, information, education, and training in the field of occupational safety and health. In addition, section (2)(b)(1) of the OSH Act (29 U.S.C. 651) 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.

- 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 Agency created the Alliance Program in 2002 as a structure for working with groups that are committed to worker safety and health. The program enables OSHA to enter into a voluntary, cooperative relationship at the National, Regional, or Area Office level with industry, labor, and other groups to improve workplace safety and health; prevent workplace fatalities, injuries, and illnesses; and reach employers and workers that OSHA may not otherwise reach through its traditional methods. These groups include trade or professional organizations, businesses, unions, consulates, faith- and community-based organizations, and educational institutions.

OSHA and the groups work together to share workplace safety and health information with workers and employers, encourage participation in Agency initiatives, develop compliance assistance tools and resources, and educate workers and employers about their rights and responsibilities. Alliance Program participants do not receive exemptions from OSHA inspections or any other enforcement benefits.

OSHA collects information from program participants for a variety of reasons during several phases of an Alliance. During development of an Alliance agreement, the information collected on industry hazards, operations, and areas of concern is necessary for the Agency to determine the areas of collaboration that will be most beneficial to both organizations (OSHA and the participant), and to tailor an agreement that is signed by OSHA and the Alliance participant. Throughout the working life of the agreement, the information collected on the Alliance participant's activities in support of the agreement is necessary to assess the continued effectiveness of individual Alliances, and the Alliance Program as a whole, in meeting their stated objectives. It also enables OSHA to adjust the focus of the collaborative effort with an individual Alliance and target the Agency's limited resources toward productive Alliances.

OSHA collects information from organizations that are signatories to an Alliance agreement ("Alliance participants"). OSHA collects this information through meetings, informal conversations, and data forms. As noted, OSHA also uses the collected information to develop Alliance agreements, support Alliance activities and Alliance agreement objectives, and develop annual and program-wide reports.

A. Establishment and Renewal of Alliance Agreements

Alliance participants work with OSHA to develop agreements with well-defined goals, and specific objectives and activities. Agreements commonly identify specific hazard(s), operations, or other areas of concern; the targeted segment within the workforce; and the planned activities to meet the agreement's overarching goals and objectives. OSHA provides templates for Alliance agreements and works with the Alliance participant to gather the information necessary to customize and complete the agreement through meetings, informal conversations, and review of a draft agreement.

As part of the development of a new or renewed Alliance, OSHA may ask the Alliance participants about the composition of their industry, workplace operations and hazards of concern, organization membership, and specific questions such as:

- What are the primary workplace safety and health hazards in your industry?
- What are the emerging workplace safety and health hazards in your industry?
- What best practices does your industry use to address workplace safety and health hazards?
- What tools, training, and events do you use to reach members and industry stakeholders?

Purpose: OSHA uses the Alliance agreements to establish the broad goals and specific objectives of the Alliances.

B. National Alliance Data Reporting - Biannual Alliance Data Reporting Form

National Alliance participants are required to complete the Biannual Alliance Data Reporting Form twice a year and submit it to OSHA. The form lists Alliance activities conducted by the participant(s), including dissemination, outreach events and public training, and training for OSHA staff. Participants include an estimate of the number reached for each activity and the OSHA emphasis areas associated with those activities.

Purpose: OSHA uses the information from the forms (national Alliance) and collaborative data gathering (Regional and Area Offices) to compile annual reports for individual Alliances and assess the effectiveness of the individual Alliance in meeting agreement goals and objectives. OSHA uses aggregate data from all active Alliances to assess the impact of the program as a whole in meeting the Agency's strategic plan goals and strategies related to outreach and communication. The success experienced by these Alliances, when shared, can serve as a means to further promote improvement in worker safety and health.

C. Alliance Annual Reports - Collaborative Data Gathering from Regional and Area Office Alliance Participants

Regional and Area Office Alliance participants do not use the Biannual Alliance Data Reporting Form to provide information to the Agency. Instead, OSHA personnel work with Regional and Area Office Alliance participants to gather and verify information about individual Alliance activities during the development of the annual reports.

Purpose: See previous purpose statement, above.

D. Alliance Participant Activities

Alliance participants conduct a range of activities as specified in the agreement. The following activities are required as a condition for participation in the program.

1. **Communication with OSHA staff:** Alliance Program participants must assign a point-of-contact to OSHA who will:
 - a. Respond timely to email inquiries/ telephone calls from OSHA staff.
 - b. Participate in Alliance meetings, as scheduled.
 - c. Keep OSHA staff abreast of any significant communication/outreach or collaboration with any US Department of Labor-affiliated entity or staff (e.g., other DOL agencies, Office of the Assistant Secretary for OSHA, other DCSP offices, other OSHA directorates, and any OSHA Regional or Area Offices.)
2. **Outreach and dissemination:** Alliance Program participants must disseminate information to their members and/or stakeholders, including employers and workers in their industry (e.g., via email blasts, blog entries, newsletters, case studies, and social media), regarding OSHA rulemakings, enforcement initiatives, compliance assistance resources, and outreach campaigns and initiatives.

Some Alliance participants will also conduct the following activities:

1. **Alliance webpage:** Each National Alliance participant must develop, publish and maintain a stand-alone webpage devoted to the Alliance and to safety and health issues affecting workers in the Alliance Program participant's industry.
 2. **Alliance projects:** Alliance participants that conduct activities beyond outreach and dissemination must follow the *Guidelines for OSHA's Alliance Program Participants: Alliance Products and Other Alliance Projects*. For selected projects, Alliance participants may work with OSHA to develop project plans. Project plans are not required for all Alliance projects, but may be used to help manage complex projects with longer timeframes. To inform the selected projects, Alliance participants may gather information from members related to a specific operation or hazard, the range and type of exposures to workers, common injuries and illnesses, supporting exposure and injury data, and industry practices to control exposures. Alliance participants identify the information needed to inform a project and select the best mechanism to gather it (e.g., through informal meetings, an existing safety and health committee, focus groups, or surveys).
 3. **Outreach events:** Some Alliance participants participate in an event such as a roundtable, conference, informational webinar, stand-down, meeting, or training in support of the Alliance or an OSHA initiative.
 4. **Training for OSHA staff:** Some Alliance participants provide safety and health training for OSHA staff or OSHA-affiliated staff (State Plan and On-Site Consultation Program staff). Participants make existing training available to OSHA, or may work with OSHA training and education staff to develop training suitable for OSHA.
 5. **Evaluating impact:** OSHA will ask National Alliance participants to complete the *Alliance Feedback Questionnaire* to gather information on the value and impact of an Alliance's activities.
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 adapting this means of collection. Also, describe any consideration of using information technology to reduce burdens.**

OSHA does not require the use of a specific technology by Alliance participants for reporting requested data. In addition, OSHA does not have the capability currently to enable direct electronic reporting of requested data. As noted, information may be gathered in meetings and via informal conversations to develop the agreement, and throughout the life of the Alliance. OSHA provides the data form noted to national Alliance participants in a common word

processing format that they can then complete electronically and submit via email. The data received in this form from participants is transferred, manually, by OSHA to databases, spreadsheets, and reports for use in generating the Annual and program reports. Alliance Program participants may use improved information technology, whenever appropriate, to make, keep, and preserve the required records. OSHA is only interested in the data it requests, not how it is gathered and retained by the participant. Where the technology exists, OSHA welcomes the use of information technology to reduce the burden.

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 A.2. above.

Each Alliance is unique, and the information needed is available only from the organizations that are signatories to the Alliance. As an Alliance is established, OSHA and the participants will identify the data needed to assess the effectiveness of the Alliance.

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

Alliance Program participants are typically trade or professional associations, some of which qualify as small businesses. OSHA provides agreement templates to reduce the burden on all applicants, including small businesses. OSHA works with Alliance Program participants during the development each Alliance (new and renewal) to select the information that will be collected, based on the goals of the agreement and the information that is readily available to the organization. Including the organization's members in this process helps minimize the information collection burden. After an agreement is signed, OSHA also works collaboratively with Alliance participants, including small businesses, to gather information for annual reports and reduce the annual reporting burden on those Alliance participants.

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.

OSHA collects information as part of the Alliance activities described in question 2 above. OSHA collects information during the establishment of an Alliance agreement, which is a one-time exercise, and during the renewal of an Alliance agreement, which occurs every two to five years. Eliminating or reducing the frequency of this information collection would make it difficult or impossible for OSHA to sign meaningful Alliance agreements that address safety and health issues of concern to OSHA and the Alliance participants.

The Biannual Alliance Data Reporting Form is submitted twice a year by National Alliance participants. OSHA uses information from the form (National Alliances) and collaborative data

gathering (field Alliances) to compile annual reports. Eliminating or reducing the frequency of the information collection for the form and annual reports would limit OSHA's ability to evaluate the impact of individual Alliances and the program as a whole, and would make it more difficult for OSHA to make improvements to the program. This would also effectively hinder OSHA's ability to measure success as required by the Government Performance Results Act (GPRA) and OSHA's Operating Plan.

Information collection as part of other Alliance activities (communication with OSHA staff, dissemination and outreach, etc.) occurs periodically during the life of an Alliance. Reducing the frequency of these activities would significantly limit the effectiveness of the Alliances.

There are no technical or legal obstacles to reducing the burden.

7. Explain 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;**
- **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 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.**

There are no special circumstances that would require the information to be collected in a manner that is inconsistent with the above guidelines.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments 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 three 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-95) (44 U.S.C. 3506 (c)(2)(A)), OSHA published a notice in the Federal Register on June 21, 2018 (83 FR 28868) soliciting comments on its proposal to obtain the Office of Management and Budget's approval for the information collection requirements associated with OSHA's Alliance Program. This notice was part of a preclearance consultation program that provided the public with an opportunity to comment. The Agency did not receive any substantive comments in response to this notice.

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

No payments or gifts are provided to the respondents.

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

Data collected regarding Alliances is considered public information. Therefore, there is no assurance of confidentiality provided to respondents through statute, regulation, or agency policy.

- 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.**

Alliance Program participants are not subjected to questions of a sensitive nature.

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.**
- **Provide estimates of annualized cost to respondents for the burden hour 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

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: October 2, 2018]. (OES data is available at https://www.bls.gov/oes/current/oes_nat.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/ecec.nr0.htm>). BLS reported that 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 rate by 1 minus the fringe benefits.

Table 1- Estimated Wage Rates

WAGE HOUR ESTIMATES				
Occupational Title	Standard Occupation	Mean Hour Wage Rate	Fringe Benefits (B)	Loaded Hourly Wage Rate

	Code	(A)		(C) = (A)/((1-(B)))
Chief Executive	11-1011	\$94.25	.317	\$137.99
Lawyer	23-1011	\$68.22	.317	\$99.88
Occupational Health and Safety Specialist	29-9011	\$35.38	.317	\$51.80
Secretaries and Administrative Assistants-	43-6014	\$17.75	.317	\$25.99
Information Technology Specialist	15-1120	\$45.10	.317	\$66.03

Number of Alliances

Estimates and summaries in this supporting statement are based on the information collected since the beginning of the Fiscal Year, 2018. There were 245 (33 National and 212 Field) active Alliances as of the end of FY 2018. We anticipate a small increase in the number of Alliances over the next three years. Therefore, we estimate that the average number of Alliances per year for the next three years will be 250.

Table 2- Historical and Estimated Alliance Counts

<i>Fiscal Year</i>	<i>Active National Alliances</i>	<i>Active Field Alliances</i>	<i>Total</i>
2014	34	230	264
2015	29	200	229
2016	30	207	237
2017	31	202	233
2018	33	212	245
Estimated Average for 2019-2021			250

A. Establishment and Renewal of Alliance Agreements

The Agency estimates that every year approximately 15 organizations will initiate an Alliance with OSHA (5 National/10 Field) and 75 Alliances will be renewed (5 National/70 Field). Organizations may work with local, Regional or National Offices when initiating an Alliance. OSHA has Alliance agreement templates that the Agency and the organization can use when preparing their initial agreement.

Table 3- New Alliances and Renew Alliances

	Initiate New Alliance	Renew Alliance	Total
National	5	5	10
Field	10	70	80

OSHA provides templates for Alliance agreements and gathers the necessary information to customize and complete the agreement from Alliance participants through meetings, informal conversations, and review of a draft agreement. OSHA believes that most of the work of drafting the agreement will be done by OSHA in collaboration with an organization worker, likely a Safety and Health Specialist (OES 29-9011). The Agency estimates that OSHA and an Occupational Health and Safety will take 6 hours draft the Alliance agreement. In addition, an attorney such as a Lawyer (OES 23-1011) will review and agreement for 1 hour, and the agreement will be formatted by an Administrative Assistant and reviewed and signed by the executive in charge of the organization, such as a Chief Executive (OES 11-1011), each of whom will spend .5 hours formatting, reviewing, and signing the agreement.

1. National Alliances – Establishment (New)

The calculation of the burden hours for an Alliance participant to establish a National Alliance Agreements, including the time for meetings, informal conversations, and review of the draft agreement, is:

Burden hours:

5 Alliance participants x 6 hours = 30 (Occupational Health and Safety Specialist)

5 Alliance participants x 1 hour = 5 (Lawyer)

5 Alliance participants x, 5 hour = 2.5 (Chief Executive)

5 Alliance participants x .5 hour = 2.5 (Administrative Assistant)

Total Burden Hours: 40

Costs:

30 burden hours x \$51.80 = \$1,554 (Occupational Health and Safety Specialist)

5 burden hours x \$99.88 = \$499.40 (Lawyer)

2.5 burden hours x \$137.99 = \$344.98 (Chief Executive)

2.5 burden hours x \$25.99 = \$64.98 (Administrative Assistant)

Total Cost: \$2,463

2. National Alliances - Renewal

The calculation of the burden hours for an Alliance participant to renew a National Alliance Agreement will be the same number of hours and include the same types of activities as establishment of the Alliance:

Burden hours:

- 5 Alliance participants x 6 hours = 30 (Occupational Health and Safety Specialist)
- 5 Alliance participants x 1 hour = 5 (Lawyer)
- 5 Alliance participants x, 5 hour = 2.5 (Chief Executive)
- 5 Alliance participants x .5 hour = 2.5 (Administrative Assistant)

Total Burden Hours: 40

Cost:

- 30 burden hours x \$51.80 = \$1,554 (Occupational Health and Safety Specialist)
- 5 burden hours x \$99.88 = \$499.40 (Lawyer)
- 2.5 burden hours x \$137.99 = \$344.98 (Chief Executive)
- 2.5 burden hours x \$25.99 = \$64.983 (Administrative Assistant)

Total Cost: \$2,463

3. Field Alliances – Establishment (New)

The calculation of the burden hours for an Alliance participant to establish a new Field Alliance Agreement, including the time for meetings, informal conversations and review of the draft agreement, is as follows:

Burden hours:

- 10 Alliance participants x 6 hours) = 60 hours (Occupational Health and Safety Specialist)
- 10 Alliance participants x 1 hour = 10 hours (Lawyer)
- 10 Alliance participants x .5 hours = 5 hours (Chief Executive Officer)
- 10 Alliance participants x .5 hour = 5 hours (Administrative Assistant)

Total Burden Hours = 80

Cost:

- 60 burden hours x \$51.80= \$3,108 (Occupational Health and Safety Specialist)
- 10 burden hours x \$99.88 = \$998.80 (Lawyer)
- 5 burden hours x \$137.99 = \$689.95 (Chief Executive)
- 5 burden hours x \$25.99 = \$129.95 (Administrative Assistant)

Total Cost: \$4,927

4. Field Alliances – Renewal

The calculation of the burden hours for an Alliance participant to renew a Field Alliance Agreement will be the same number of hours and include the same types of activities as establishment of the Alliance:

Burden hours:

- 70 Alliance participants x 6 hours= 420 hours (Occupational Health and Safety Specialist)
- 70 Alliance participants x 1 hour = 70 hours (Lawyer)
- 70 Alliance participants x .5 hours = 35 hours (Chief Executive Officer)
- 70 Alliance participants x .5 hour = 35 hours (Administrative Assistant)

Total Burden Hours = 560

Cost:

- 420 burden hours x \$51.80 = \$21,756 (Occupational Health and Safety Specialist)
- 70 burden hours x \$99.88 = \$6,991.60 (Lawyer)
- 35 burden hours x \$137.99 = \$4,829.65 (Chief Executive)
- 35 burden hours x \$25.99 = \$909.65 (Administrative Assistant)

Total Cost: \$34,487

B. National Alliance Data Reporting

Table 4- Alliance Data Reporting and Annual Reports

	Semi-Annual Data Reporting	Annual Report
National	35	35
Field	n/a	215

National Alliance participants complete a Biannual Alliance Data Reporting Form. 35 National Alliances will report twice a year on the OSHA-provided form. OSHA believes that an Occupational Health and Safety Specialist can complete this form in eight hours.

Burden hours: 35 Alliance participants x 8 hours x twice per year = 560 hours

Cost: 560 burden hours x \$51.80 = \$29,008

C. Alliance Annual Reports

OSHA requires annual reports for National and Field Alliances. OSHA has annual report templates that it uses to prepare annual reports for individual Alliances. For National Alliances, OSHA personnel prepare the annual reports from the Biannual Alliance Data Reporting Forms submitted by Alliance participants. National Alliance participants review the annual reports

compiled by OSHA. For field Alliances, OSHA personnel work with Alliance participants to prepare the annual reports. OSHA field personnel enter their Alliance-related activities into the OSHA Information System (OIS) and use the OIS information to help populate the annual reports.

1. National Alliance Annual Reports

OSHA believes that the National Alliance Annual Report, which is prepared by OSHA personnel, can be reviewed (along with OSHA staff) by the Alliance participant's Occupational Health and Safety Specialist in 2 hours.

Burden hours: 35 Alliance participants x 2 hours = 70

Cost: 70 burden hours x \$51.80 = \$3,626

2. Field Alliance Annual Reports

OSHA believes that the Field Alliance Annual Report can be completed, with assistance provided by OSHA personnel, by the Alliance participant's Occupational Health and Safety Specialist in 4 hours.

Burden hours: 215 Alliance participants x 4 hours = 860

Cost: 860 burden hours x \$51.80 = \$44,548

D. Alliance Participant Activities

Alliance participants conduct the following activities as specified in the agreement.

1. Communication with OSHA Staff

All Alliance participants (National and Field) must maintain communication with OSHA as a condition for participation in the program. This includes responding timely to email inquiries/telephone calls from OSHA staff, participating in Alliance meetings, and keeping OSHA staff informed of any significant communication/outreach or collaboration with any U.S. Department of Labor-affiliated entity or staff.

OSHA believes that an Occupational Health and Safety Specialist will spend an average of 10 hours per year communicating with OSHA staff.

Burden hours: 250 Alliance participants (National and Field) x 10 hours = 2,500

Cost: 2,500 burden hours x \$51.80 = \$129,500

2. Outreach and dissemination

All Alliance participants (National and Field) must disseminate information to their stakeholders on OSHA rulemaking, enforcement initiatives, compliance assistance resources, and outreach campaigns and initiatives.

OSHA believes that an Occupational Health and Safety Specialist will spend an average of 10 hours per year disseminating information to their stakeholders.

Burden hours: 250 Alliance participants (National and Field) x 10 hours = 2,500

Cost: 2,500 burden hours x \$51.80 = \$129,500

3. Alliance webpage

All National Alliance participants must post and maintain a stand-alone webpage devoted to the Alliance and safety and health issues affecting workers in the participant's industry. These pages are posted on the participant's existing website.

OSHA believes that an Occupational Health and Safety Specialist will spend an average of 4 hours per year reviewing the contents of the website and an Information Technology Specialist will spend an average of 4 hours per year on the maintenance and update of the Alliance webpage.

Burden hours:

35 Alliance participants x 4 hours = 140 hours (Occupational Safety & Health Specialist)

35 Alliance participants x 4 hours = 140 hours (IT Specialist)

Total Hours = 280

Cost:

140 burden hours x \$51.80 = \$7,252 (Occupational Health and Safety Specialist)

140 burden hours x \$66.03 = \$9,244 (IT specialist)

Total Cost: \$16,496

4. Alliance projects

Some Alliance participants conduct projects such as development of Alliance products that go beyond outreach and dissemination. These participants must follow the *Guidelines for OSHA's Alliance Program Participants: Alliance Products and Other Alliance Projects*. For selected projects, Alliance participants may work with OSHA to develop project plans. Project plans are not required for all Alliance projects, but may be used to help manage complex projects with

longer timeframes. OSHA estimates that 30 Alliances (10 National and 20 Field) do these projects in a particular year.

OSHA believes that an Occupational Health and Safety Specialist will spend an average of 32 hours per year on these projects. In addition, OSHA estimates that each of these Alliance participants will gather information from members in some manner during a particular year, reaching an estimated 100 members, who will spend an average of 1 hour per year to provide the information.

Burden hours:

30 Alliance participants (National and Field) x 32 hours = 960 hours

30 Alliance participants x 100 members x 1 hour = 3,000 hours

Total Hours: 3,960

Cost: 3,960 burden hours x \$51.80= \$205,128

5. Outreach events

Some Alliance participants participate in events in support of the Alliance or an OSHA initiative. OSHA estimates that 170 Alliances (20 National and 150 Field) participate in these events in a particular year.

OSHA believes that an Occupational Health and Safety Specialist will spend an average of 10 hours per year on these events.

Burden hours: 170 Alliance participants (National and Field) x 10 hours = 1,700 hours

Cost: 1,700 burden hours x \$51.80= \$88,060

6. Training for OSHA staff

Some Alliance participants provide safety and health training for OSHA staff or OSHA-affiliated staff (State Plan and On-Site Consultation Program staff). OSHA estimates that 8 Alliances (5 National and 3 Field) provide this training.

OSHA believes that an Occupational Health and Safety Specialist will spend an average of 24 hours per year on this training.

Burden hours: 8 Alliance participants (National and Field) x 24 hours = 192 hours

Cost: 192 burden hours x \$51.80 = \$9,946

7. Evaluating impact

OSHA will ask National Alliance participants to complete the *Alliance Feedback Questionnaire* annually to gather information on the value and impact of an Alliance's activities.

OSHA believes that an Occupational Health and Safety Specialist will spend an average of 8 hours per year to provide this information for the 35 National Alliances. In addition, OSHA estimates that 5 of these National Alliance participants will conduct member surveys in a particular year. These surveys will reach an estimated 100 members, who will spend an average of 1 hour per year to respond.

Burden hours:

35 Alliance participants x 8 hours = 280

5 Alliance participants x 100 members x 1 hour = 500 hours

Total Hours: 780

Cost: 780 burden hours x \$51.80 = \$40,404

E. Total Burden Hours and Costs

Based on the average from Table 5, the following estimates can be established for burden hours and costs:

- Table 5 below shows the estimate burden hours and costs for the private and public sectors. State government agencies are signatories on some OSHA field Alliances. OSHA estimates that the public sector (state government) has 8 percent of the total burden hours (14,122) and costs.
- The total burden hours for the private sector are 12,992 and the total cost is \$681,312.
- The total burden hours for the public sector (state government) are 1,130 and the total cost is \$59,244.

Table 5 –Estimated Annualized Hour and Cost Burdens

Information Collection Requirement	Type of Respondent	No. of Respondents ¹	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in Hrs.)	Total Burden Hours	Avg. Hourly Wage Rate	Total Burden Costs
A. Establishment and Renewal of Alliance Agreements								
1. National Alliances-New	Employer (Occupational Health and Safety Specialist)	5	1	5	6	30	\$51.80	\$1,554
	Employer (Lawyer)	5	1	5	1	5	\$99.88	\$499
	Employer (Chief Executive)	5	1	5	.5	2.5	\$137.99	\$345
	Employer (Admin. Assist.)	5	1	5	.5	2.5	\$25.99	\$65
	Subtotal A.1.	5	--	20	--	40	--	2,463
2. National Alliances-Renewal	Employer (Occupational Health and Safety Spec.)	5	1	5	6	30	\$51.80	\$1,554
	Employer (Lawyer)	5	1	5	1	5	\$99.88	\$499
	Employer (Chief Executive)	5	1	5	.5	2.5	\$137.99	\$345
	Employer (Adm. Assistant)	5	1	5	.5	2.5	\$25.99	\$65
	Subtotal A.2.	5	--	20	--	40	--	\$2,463

¹ Table 2 of this Supporting Statement indicates that the total number of respondents is 250 (the estimated average number of OSHA Alliances for 2019-2021). For purpose of this analysis, one private sector or state alliance participant, an employer, is assumed per Alliance. The employer may have a number of its employees (such as occupational safety and health specialists and lawyers) working to support the alliance; however, the analysis counts each Alliance as one respondent because the participant is the employer. In addition, Table 3 of this Supporting Statement indicates Agency estimates that every year approximately 15 organizations will initiate an Alliance with OSHA (5 National/10 Field) and 75 Alliances will be renewed (5 National/70 Field). These Alliance participants are already counted as part of the total 250 Alliance participants. Also, many of the activities of the same 250 Alliance participants are included in the table and therefore do not yield additional PRA respondents. Therefore, some “unduplicated respondent” subtotals in this column must be 0 or less than the duplicated total to avoid over-counting of PRA respondents.

OSHA'S ALLIANCE PROGRAM
 1218-ONEW
 May 2019

3. Field Alliances-New	Employer (Occupational Health & Safety Specialist)	10	1	10	6	60	\$51.80	\$3,108
	Employer (Lawyer)	10	1	10	1	10	\$99.88	\$999
	Employer (Chief Executive Officer)	10	1	10	.5	5	\$137.99	\$689.95
	Employer (Adm. Assist.)	10	1	10	.5	5	\$25.99	129.95
	Subtotal A.3.	10		40	--	80	--	\$4,927
4. Field Alliances-Renewal	Employer (Occupational Health & Safety Specialist)	70	1	70	6	420	\$51.80	\$21,756
	Employer (Lawyer)	70	1	70	1	70	\$99.88	\$6,992
	Employer (Chief Executive Officer)	70	1	70	.5	35	\$137.99	\$4,830
	Employer (Adm. Assist.)	70	1	70	.5	35	\$25.99	\$910
	Subtotal A.4.	70		280	--	560	--	\$34,487
Subtotal A.		90 (unduplicated total)		360		720		\$44,340
B. National Alliance Data Reporting								
	Employer (Occupational Health & Safety Specialist)	35	2	70	8	560	\$51.80	\$29,008
Subtotal B.		25 (unduplicated total)		70		560		\$29,008
C. Alliance Annual Reports								
1. National Alliance Annual Reports	Employer (Occupational Safety & Health Specialist)	35	1	35	2	70	\$51.80	\$3,626

OSHA'S ALLIANCE PROGRAM
 1218-ONEW
 May 2019

2. Field Alliance Annual Reports	Employer (Occupational Safety & Health Specialist)	215	1	215	4	860	\$51.80	\$44,548
Subtotal - C.		135 (unduplicated total)		250		930		\$48,174
D. Alliance Participant Activities								
1. Communication with OSHA Staff	Employer (Occupational Safety & Health Specialist)	250	1	250	10	2,500	\$51.80	\$129,500
2. Outreach and dissemination	Employer (Occupational Safety & Health Specialist)	250	1	250	10	2,500	\$51.80	\$129,500
3. Alliance Webpage	Employer (Occupational Safety & Health Specialist)	35	1	35	4	140	\$51.80	\$7,252
	Employer (IT Specialist)	35	1	35	4	140	\$66.03	\$9,244
4. Alliance Projects	Employer (Occupational Safety & Health Specialist)	30	1	30	32	960	\$51.80	\$49,728
	Employer (Occupational Safety & Health Specialist)	30	100	3000	1	3,000	\$51.80	\$155,400
5. Outreach Events	Employer (Occupational Safety & Health Specialist)	170	1	170	10	1,700	\$51.80	\$88,060
6. Training OSHA Staff	Employer (Occupational Safety & Health Specialist)	8	1	8	24	192	\$51.80	\$9,946
7. Evaluating Impact	Employer (Occupational Safety & Health Specialist)	35	1	35	8	280	\$51.80	\$14,504

	Employer (Occupational Safety & Health Specialist)	5	100	500	1	500	\$51.80	\$25,900
	Subtotal D. 7.	40		535		780		\$40,404
Subtotal D.		0 (unduplicated total)		4,313		11,912		\$619,034
Total		250*		4,993		14,122		\$740,556

*The number of unduplicated respondents is 250.

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 a 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.**

The cost determined under Item 12 accounts for the total annual cost burden to respondents resulting from the information collection requirements.

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

OSHA personnel conduct most of the work to complete, review, and renew National and Field Alliance Agreements, and to produce the Alliance Annual Reports. OSHA believes that this work will typically be conducted by a GS-13, Step 6 with a base wage rate of \$54.21.

The hours and costs are shown in Table 6. A total of 6,240 hours will be spent by OSHA staff, at a cost of \$338,271 per year.

Table 6 – Annualized Federal Government Cost

Activity	Number of Alliances	Hours per Federal Employee	Total Federal Employee Time	Federal Wage Rate** (GS13/06)	Total Federal Cost
Alliance Agreements					
National Alliances	10	40	400	\$54.21	\$21,684
	New and Renewals				
Field Alliances	80	32	2,560	\$54.21	\$138,778
	New and Renewals				
Total			2,960		\$160,462
Data Reporting Form					
National Alliances	35 (twice a year)	6	420	\$54.21	\$22,768
Field Alliances (OIS)*	215	4	860	\$54.21	\$46,621
Total			1,280		\$69,389
Annual Report					
National Alliances	35	8	280	\$54.21	\$15,179
Field Alliances	215	8	1,720	\$54.21	\$93,241

Activity	Number of Alliances	Hours per Federal Employee	Total Federal Employee Time	Federal Wage Rate** (GS13/06)	Total Federal Cost
Total			2,000		\$108,420
Grand Total			6,240		\$338,271

[*Field Alliances do not use the Data Reporting Form. OSHA staff enters Alliance activity information into the OSHA Information System \(OIS\).](#)

**The Salary in table above is cited from <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/DCB.aspx>

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

The Agency requests OMB approval of this collection that was previously in use without a valid OMB Control Number. The program started out small and grew over time. The violation was discovered internally and the proper steps are being taken to get this information collection on OSHA's ICR inventory. This proposed new information collection is associated with OSHA's Alliance Program. The total burden hours for the information collection requirements contained in the proposed ICR would result in a total program change (increase) of 14,122 hours.

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 the information, completion of report, publication dates, and other actions.

Information on Alliances will be used both internally and externally by the Agency to gauge its conformance with the goals and objectives outlined in OSHA's Strategic Plan.

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.

OSHA will display the OMB expiration date on the information collection forms.

18. Explain each exception to the certification statement.

The Agency is not seeking an exception to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

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