**SUPPORTING STATEMENT**

**Registered Apprenticeship College Consortium**

**OMB Control No. 1205-0512**

**General Instructions**

The Department of Labor's (DOL's) Employment and Training Administration (ETA) is proposing a reinstatement without change of a previously approved collection for the authority to conduct the information collection request (ICR) titled, “Registered Apprenticeship College Consortium.” ETA discontinued this collection, and part of the justification referenced a new user-friendly application tool. However, ETA has not yet built the new user-friendly application tool, and there is no timeframe for expected completion. Therefore, this collection will have no changes from its previous iteration.

**Specific Instructions**

**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.*

The Secretary of Labor’s Advisory Committee on Apprenticeship (ACA), which includes members from the employer, labor, and public sectors, has identified the articulation of the Registered Apprenticeship completion certificate for college credit as an important opportunity for apprentices to continue on a career pathway, enhance skill acquisition, and earn an associate’s or bachelor’s degree. Increasing articulation agreements between Registered Apprenticeship sponsors and colleges also creates a new pipeline of degree-seekers and enhance the competitiveness of American industry by enlarging the pool of highly-trained workers that possess in-demand skills and competencies. The U.S. Department of Labor (DOL), ETA, Office of Apprenticeship (OA) has identified 1,660 articulation agreements between Registered Apprenticeship sponsors and local two- and four-year colleges. There are many more of these agreements that OA will seek to identify. The agreements are not portable to other colleges; rather they are negotiated at the local level. The ACA requested that the DOL and Department of Education (DOE) jointly find a solution so that Registered Apprenticeship programs could be articulated to college credit on a national level.

Registered Apprenticeship pairs paid, on-the-job learning with related technical/theoretical classes in a career field. Industries and employers are highly involved in the development and implementation of the programs. The earn-while-you-learn model is extremely structured and rigorous, and recommends a minimum of 144 hours of class time per year combined with a minimum of 2000 hours of on-the-job learning. Programs last between one and five years depending on the occupation. Registered Apprenticeships offer job seekers immediate employment opportunities that pay good wages and career growth, highly-sought life and skill sets, portable credentials and the opportunity to apply their apprenticeship training to two- and four-year post-secondary programs.

The Registered Apprenticeship system is administered by OA which oversees Registered Apprenticeship programs as well as State Apprenticeship Agencies (SAAs). The National Apprenticeship Act of 1937, (subsequently referred to as “the Act”) Section 50 (29 U.S.C. 50), authorizes and directs the Secretary of Labor "to formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices, to extend the application of such standards by encouraging the inclusion thereof in contracts of apprenticeship, to bring together employers and labor for the formulation of programs of apprenticeship, to cooperate with State agencies engaged in the formulation and promotion of standards of apprenticeship, and to cooperate with the Secretary of Education in accordance with Section 17 of Title 20.” Section 50a of the Act authorizes the Secretary of Labor to “publish information relating to existing and proposed labor standards of apprenticeship,” and to “appoint national advisory committees...” (29 U.S.C. 50a) (for a copy of the Act, visit <http://www.doleta.gov/oa/history.cfm#amendments>). The administration of the system is guided by Title 29 CFR Part 29, regulations that were updated in 2008 to address 21st century workforce needs as well as enhance accountability of the OA.

The DOE Office of Adult and Vocational Education (OVAE) and the OA have worked jointly for a number of years on projects to enhance a pathway for adult learners from Registered Apprenticeship to an associate’s and bachelor’s degree with the goal of improved employment outcomes and higher earnings. The DOE recently released the Career Technical Education (CTE) Blueprint to transform the federally administered Carl D. Perkins Career Technical Education program. The CTE Blueprint supports articulation of Registered Apprenticeship and industry-based education and training programs into college academic credits. This blueprint will help better align programs and institutions, enhance a strong collaboration among secondary, postsecondary, Registered Apprenticeship, employer and industry partners and result in meaningful accountability for academic outcomes and building technical employability skills.

The ACA, with the support of DOL Assistant Secretary for Employment and Training and the DOE Assistant Secretary for Vocational and Adult Education, convened an ad-hoc workgroup in 2011 to increase articulation agreements among post-secondary education institutions and Registered Apprenticeship program sponsors. The workgroup was composed of ACA members, community college leaders, Registered Apprenticeship sponsors, American Association of Community Colleges (AACC) representatives, and leadership from OA and OVAE. The ad-hoc workgroup consulted with a broad group of colleges and Registered Apprenticeship sponsors to address the issue, explore possible organizational structures, develop a framework and put forth a proposal. Goals included (1) increased graduation rates, (2) increased number of people who earn a credential, (3) providing career paths leading to good jobs, (4) portability, (5) accessibility, and (6) sustainability. At the September 2011 meeting of the ACA, a proposal was adopted unanimously to form a national consortium based on the successful service members Opportunity Colleges (SOC) Consortium model. The SOC is a consortium of colleges that provides college articulation for soldiers and veterans who accumulate credits at a number of colleges. The SOC is supported by the Department of Defense. The ACA also adopted the Registered Apprenticeship-College Consortium Articulation Framework which outlines the goals of the consortium, the principles that guide the effort, conditions of membership, and criteria.

The purpose of the data collection is to establish membership in the Registered Apprenticeship College Consortium. The Consortium has three types of members: two- and four-year post-secondary institutions, Registered Apprenticeship sponsors, and organizations and associations that represent institutions or sponsors on a national, regional or state level and serve in a coordinating role to facilitate membership in the consortium.

Post-secondary institution members must be listed in the Council for Higher Education Accreditation’s (CHEA) Database of Programs Accredited by Recognized U.S. Accrediting Organizations and be a degree-granting institution that is duly accredited by a regional institutional accrediting agency recognized by the U.S. Department of Education or by the CHEA. They must agree to accept the Registered Apprenticeship completion certificate at the value assigned by a recognized third party accreditation evaluator for college credit, for purposes of facilitating the transfer of credit between consortium member colleges.

Registered Apprenticeship sponsor members must have a national, regional or local program or guideline standards registered with either the OA or SAA and submit to a program review performed by a national, regional, state or local educational entity for purposes of assessing program quality and rigor and determining credit value for learning acquired during Registered Apprenticeship.

“Other” organization or association members must represent two- and four-year post-secondary institutions on the national, regional or state level, or represent Registered Apprenticeship sponsors on the national, regional or state level, and must serve in a coordinating role to facilitate membership in the consortium.

The data collection includes the three application forms, one each for the three member categories of the consortium. The applications are based on the SOC Consortium application. The information is on the US DOL Office of Apprenticeship website at <https://doleta.gov/oa/racc.cfm>. To join the consortium, sponsors, colleges or associations will click the “application download” link for their category. The on-line PDF application appears to be filled out online (details listed below).

Users looking to find information about consortium members will go to the other members link on the homepage and then click on the U.S. state map, and information will appear where the consortium members are located along with their information from the applications. This will facilitate graduates of apprenticeship programs being able to find colleges across the country that will accept their apprenticeship certificate for college credit.

**Application for Post-Secondary Members**

*Step 1* asks for institutional information including name of the institution, address, phone number and website. The following information is requested by checking boxes: if Registered Apprenticeship College Consortium (RACC) membership applies to a statewide system, an institution, or part of the institution; whether the institution is public or private, for-profit or non-profit; what regional accrediting organization grants it credit; if the institution offers apprenticeship-related instruction for credit or non-credit; what awards the institution offers; if the credit system is semester, quarter or trimester; and, in what states degree programs are operated.

*Step 2* asks if the institution has articulation agreements with Registered Apprenticeship programs and if affirmative, to provide information on the program including the name of the program, the point of contact, address and the occupations. This section also requests a list of courses offered for the Registered Apprenticeship program and if they count as credit towards an associate’s or bachelor’s degree.

*Step 3* covers undergraduate admissions, prior learning and non-traditional credit information. The section asks (by checking boxes) what, if any admissions and placement tests are required for apprentices seeking a degree, the amount of credit the institution will award for non-traditional learning, and the prior learning examinations that are accepted by the institution.

*Step 4* asks for information for the RACC institutional representatives, a representative who will be the primary point of contact for parties interested in applying their apprenticeship completion certificate to college credit and the representative responsible for complying with the RACC.

*Step 5* is the signatory page. The president, chancellor or other senior administrator authorized by the president or chancellor to make this commitment signs and includes his/her name, position, phone number and e-mail.

**Application for Registered Apprenticeship Sponsors**

*Step 1* asks the sponsor to self-identify as a national sponsor that includes all or just select training centers; a regional sponsor that includes all or just select training centers; or a sponsor with a single site.

*Step 2* requests point of contact information including name, title, sponsor name, address, phone, e-mail, and website.

*Step 3* requests information on the third party evaluator who reviewed the program, including name, address, website and phone.

*Step 4* asks for information from national and regional sponsors on the local training centers that are part of the apprenticeship program including the local point of contact including name, title, address, phone, e-mail, and website; it also requests the point of contact information for any 2- or 4-year colleges with which they have articulation agreements.

*Step 5* asks for information for the RACC institutional representatives, a representative who will be the primary point of contact for parties interested in applying their apprenticeship completion certificate to college credit and the representative responsible for complying with the RACC.

*Step 6* is the signatory page. The president or other senior administrator authorized by the president to make this commitment signs and includes his/her name, position, phone number and e-mail.

**Application for “Other” Category Membership**

*Step 1* asks about the type of organization and group they represent. Response is by checking a box. The seven possible selections include national, state or regional representative of colleges; national, state or regional representatives of sponsors; and “other.”

*Step 2* requests the point of contact information for the organization including name, address, phone and e-mail and what type of relationship it has with colleges or Registered Apprenticeship sponsors.

*Step 3* requests the name and contact information for the RACC representative.

*Step 4* is the signatory page. The president, CEO or other senior administrator authorized by the president or CEO to make this commitment signs and includes his/her name, position, phone number and e-mail.

Regulations

See OA’s website at: <http://www.doleta.gov/oa/pdf/FinalRule29CFRPart29.pdf>.

1. *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 purpose of the information collection is to gather information for a public database and website on the RACC members. Members will be Registered Apprenticeship sponsors, two- and four-year institutions and associations or organizations that represent sponsors and colleges. This will provide graduates of Registered Apprenticeship programs and other interested parties information on whether a Registered Apprenticeship program participates in the consortium, what colleges accept a Registered Apprenticeship completion certificate, and the credit value of that certificate. This will help many apprenticeship graduates who have moved from the location where they completed their apprenticeship to apply the certificate towards an associate’s or bachelor’s degree from a RACC college member in another location. Currently, that is not possible. The consortium will facilitate sponsors and apprentices’ application of their Registered Apprenticeship certificate for college credit on a national scale.

*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.*

Consideration has been given to the use of improved information technology to reduce the burden; however, ETA determined the cost to develop an online system would not be justified for the low number of respondents. The consortium applications are web-based and easy to navigate. An OA employee will be available upon request to provide full technical assistance and services to those sponsors, colleges and “other” category organizations/associations that do not have computer technology available.

*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.*

Articulation agreement information is not required in the Registered Apprenticeship Partner Information Data System (RAPIDS), nor is the Agency aware of any database that collects this information. There is no other consortium like this, so the information requested is not duplicative.

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

The information collected by the Registered Apprenticeship College Consortium does not have a significant impact on small businesses; however, this information collection requests only basic information to help apprenticeship graduates and other interested parties find the information needed to contact two- and four-year post-secondary institutions or a sponsor about applying their certificate to credit

*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.*

Failure to conduct this information collection would prevent creation of a public database and website on RACC members and keep Registered Apprenticeship program graduates and other interested parties from having information on whether a Registered Apprenticeship program participates in the consortium, which colleges accept a Registered Apprenticeship completion certificate, and the credit value of that certificate. The agency believes non-approval would particularly harm apprenticeship graduates who have moved from the location where they completed their apprenticeship. Joining the consortium and filling out the application is a voluntary process. A sponsor or college will only submit an application if they want to be a member. Information will be reviewed at the time of application by OA staff. We will request that contact information be updated if there are personnel or other changes, or if the entities withdraw from the consortium. The collection frequency cannot be further reduced.

*7. Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5:*

The information is collected in a manner consistent with paperwork requirements. Data collection and retention is consistent with 5 CFR 1320.5.

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

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

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

A 60-day Paperwork Reduction Act (PRA) notice was published in the Federal Register on September 30, 2019 (84 FR 51635). No comments were received.

*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 direct payments to respondents. The OA does not provide funding to Registered Apprenticeship sponsors, two- and four-year post-secondary institutions or national, regional or state organizations that represent sponsors or post-secondary institutions.

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

No assurance of confidentiality is provided, and information collected will be posted on a public website. The agency notes, however, that no confidential information is requested.

*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 information is collected that is considered to be of a sensitive nature.

*12. Provide estimates of the hour burden of the collection of information. The statement should:*

The purpose of the data collection is to establish membership in the Registered Apprenticeship College Consortium. The Consortium has three types of members: two- and four-year post-secondary institutions, Registered Apprenticeship sponsors, and organizations and associations that represent institutions or sponsors on a national, regional or state level and serve in a coordinating role to facilitate membership in the consortium. There is a one-time data entry burden to establish membership for all categories. Members are asked to update information on a two-year basis, particularly regarding point of contact and additions or changes on articulation agreements with institutions and sponsors so our website is current. OA ensures that updated information comes from the authorized organization by having updates go to a designated e-mail account. Upon receipt and review, OA staff verbally verifies the information with the organization. For sponsors and institutions with 20 or more articulation agreements, OA staff enters data from a spreadsheet provided by those organizations.

1. **Two- and Four-Year Post-Secondary Institution Membership**

The application asks for readily available information about the institution and its associated Registered Apprenticeship programs (if any) that requires minimum to little preparation time to gather or research. The application is broken into the following four sections: (1) institutional information, (2) undergraduate admissions/placement tests, (3) non-traditional credit information, and (4) affirmation of compliance with RACC principles and criteria.

In addition to point of contact information, the application is largely comprised of check boxes and yes/no questions. The one major exception to this approach is a request for summary information regarding related instruction to any Registered Apprenticeship programs. In particular, this section requests a listing of courses, related occupations, and Registered Apprenticeship sponsor information.

The OA estimates that it will take a representative from a post-secondary institution approximately 10 minutes to enter applicant information and 5 minutes to enter articulation agreement information, including the time necessary to research and gather information. There are 1,700 known articulation agreements between Registered Apprenticeship sponsors and 422 two- and four-year post-secondary institutions in the 26 states managed by OA. Based on meetings with two- and four-year post-secondary institutions, there appears to be widespread interest in joining a consortium. However, there is no detailed information on the number of articulation agreements that exist across the nation, as that information is not required in the Registered Apprenticeship Partner Information Data System (RAPIDS). To assist institutions in their reporting, OA staff will be available to enter the data for those institutions that have 20 or more articulation agreements. Instead of entering the articulation agreements online, institutions with 20 or more agreements will be encouraged to submit a data spreadsheet of relevant information directly to OA staff.

**Current Collection**

Since beginning the collection in 2013, 335 two- and four-year post-secondary institutions have completed the online application and joined the consortium. Of these respondents, ten institutions had 20 or more articulation agreements and provided a file transfer of their information after completing the online application. Of the remaining 325 respondents that entered their articulation agreement information online, only 37 institutions entered additional articulation agreement information. These 37 respondents all entered one articulation agreement.

The total number of applications and articulation agreements entered online was as follows:

* 288 had no agreements
* 37 institutions had 1 agreement
* 10 institutions had 20 or more agreements

|  |  |  |
| --- | --- | --- |
| Number of Institutions | Average Number of Articulation Agreements per Institution | Total Number of Articulation Agreements |
| 37 | 1 | 37 |
| 288 | 0 | 0 |
| 10 | 20 | 200 |
| Total number of articulation agreements for two- and four-year post-secondary institutions during the first year | | **335** |

Total Burden of the First Three of Current Collection = 64 hours

* Online applications/articulation agreements: 335 Institutions x 10 minutes + 37 articulation agreements x 5 minutes per agreement to enter online. This equates to 3535 minutes or 59 hours.
* File transfers: 10 Institutions—10 file transfers to OA staff x 30 minutes per file (this includes the time to complete the online application and create the file). This equates to 300 minutes or 5 hours.

**NOTE**: The original burden estimate for the first three years of this collection was:

|  |  |
| --- | --- |
| Period | Burden Hours |
| First Year | 232 |
| Second Year | 24 |
| Third Year | 24 |
| Total Estimated Three Year Burden | 280 |
| Annualized Burden Hours | 93.3 |

Prior to the start of this collection, it was assumed that articulation agreements were much more prevalent and that the collection would require more effort on the part of the 2- or 4-year institution. The annual burden hours for this collection going forward have been adjusted accordingly.

**Annual Burden for Two- and Four-Year Post-Secondary Institution**

Based on our existing experience with this collection, the annual burden = **20.5 hours.**

* Online applications/articulation agreements per year: 100 institutions per year x 10 minutes + 20 articulation agreements x 5 minutes per agreement to enter online. This equates to 1,100 minutes or 18 hours.
* File Transfers from five institutions per year: 5 file transfers to OA staff per year x 30 minutes per file (this includes the time to complete the online application and create the file). This equates to 150 minutes or 2.5 hours.

The cost for 100 new members to the consortium per year is estimated to be **$487** (20.5 hours x $23.76\*).

\*The estimated hourly compensation rate for an administrative assistant (43-6011 through 43-6013) in the private sector was calculated by multiplying the median hourly wage of $18.28, by 1.30, to account for private-sector employee benefits. The hourly compensation rate for administrative assistant is **$23.76**. For the median hourly wage, see the Department’s BLS National Occupational Employment and Wage Estimates, May 2018, at: <http://www.bls.gov/oes/current/oes436014.htm> and for the Employer Costs for Employee Compensation, see BLS New Release, Table A., June 2019 at: <http://www.bls.gov/news.release/pdf/ecec.pdf>.

**NOTE**: For reginfo.gov database estimate purposes, ETA assumes that 90% of the responses will come from the private sector and 10% would come from Federal government agencies (5%) and state (3%), local (1%), or tribal (1%) governments.

**B. Registered Apprenticeship Sponsor Membership**

The application asks for readily available information from the program sponsor and its associated Registered Apprenticeship program’s articulation agreement and the third party assessment that requires minimum to little preparation time to gather or research. In addition to point of contact information, the application is largely comprised of summary questions regarding articulation agreements.

**NOTE**: For reginfo.gov database estimate purposes, ETA assumes that 90% of the sponsors come from the private sector and the remaining 10% of the sponsors would be from Federal government agencies (5%); and state (3%), local (1%), or tribal (1%) governments.

OA estimates that it will take a representative from a program sponsor approximately 10 minutes to enter their application, including the time necessary to research and gather information. Of the approximately 23,441 active programs nationwide in Fiscal Year (FY) 2018 approximately 5,000 programs have five or more apprentices and 87 are large national programs. Now that the consortium is well established, it is anticipated that between 25 and 50 program sponsors will voluntarily join by registering online in each subsequent year. Although ETA does not have detailed information on the number of articulation agreements, the information is not required in the Registered Apprenticeship Partner Information Data System (RAPIDS), none of the 956 sponsor funded training centers that have voluntarily joined the RACC since its establishment in 2013 have submitted articulation agreements.

**Current Collection**

Total Burden of the First Two Years of Current Collection = 159 hours

* Online Applications: 956 program sponsors x 10 minutes per application to enter online. This equates to 9,560 minutes or 159 hours.

**NOTE**: The original burden estimate for the first three years of this collection was:

|  |  |
| --- | --- |
| Period | Burden Hours |
| First Year | 56.5 |
| Second Year | 12 |
| Third Year | 12 |
| Total Three Year Burden | 80.5 |
| Annualized Burden Hours | 27 |

Prior to the start of this collection, it was assumed at the time that articulation agreements were much more prevalent and that few program sponsors would elect to join the consortium. The annual burden hours going forward have been adjusted accordingly.

**Annual Burden for Registered Apprenticeship Sponsor**

Based on our existing experience with this collection, the annual burden = **8.33** **hours**.

* Online Applications: 50 program sponsors per year x 10 minutes per application to enter online. This equates to 500 minutes or 8.33 hours.

The cost for 50 new members to the consortium per year is estimated to be **$202** (8.3 hours x $23.76\*).

\*The estimated hourly compensation rate for an administrative assistant (43-

6014) in the private sector was calculated by multiplying the median hourly wage of $18.28, by 1.30, to account for private-sector employee benefits. The hourly compensation rate for administrative assistant is **$23.76**. For the median hourly wage, see the Department’s BLS National Occupational Employment and Wage Estimates, May 2018, at: <http://www.bls.gov/oes/current/oes436014.htm> and for the Employer Costs for Employee Compensation, see BLS New Release, Table A., June 2019 at: <http://www.bls.gov/news.release/pdf/ecec.pdf>

**C. National, Regional, or State Associations or Other Organizational Memberships**

The application asks for readily available information from national, regional, or state associations or other organizations that represent colleges and Registered Apprenticeship sponsors that requires minimum to little preparation time to gather or research.

OA estimates that it will take a representative from an association or other organization approximately 10 minutes to complete the application, including the time necessary to research and gather information. It is anticipated that between 5 and 10 associations/organizations per year will voluntarily join the consortium.

**Current Collection**

To date, 16 associations/organizations have joined the consortium.

Total Burden of the First Three Years of Current Collection = **2.6 hours.**

* (10 minutes x 16 organization) / 60 minutes = 2.6 hours

**Annual Burden for National, Regional, or State Associations or Other Organizations**

Based on our existing experience with this collection, the annual burden = **2** **hours**.

* Annual Burden: (10 minutes x 10 organization) / 60 minutes = 2 hours.

The cost for 10 new members to the consortium per year is estimated to be **$48** (2 hours x $23.76\*).

\*The estimated hourly compensation rate for an administrative assistant (43-

6014) in the private sector was calculated by multiplying the median hourly wage of $18.28, by 1.30, to account for private-sector employee benefits. The hourly compensation rate for administrative assistant is **$23.76**. For the median hourly wage, see the Department’s BLS National Occupational Employment and Wage Estimates, May 2018, at: <http://www.bls.gov/oes/current/oes436014.htm> and for the Employer Costs for Employee Compensation, see BLS New Release, Table A., June 2019 at: <http://www.bls.gov/news.release/pdf/ecec.pdf>.

**D. Bi-Annual Review of Information**

The consortium information will be reviewed bi-annually (i.e., once every two years) by the Two- and Four-Year Post- Secondary Institutions to ensure that the point of contact information and the information on the articulation agreements are current. OA will send a form to the institutional member with the existing information. It should take five minutes per articulation agreement to review and update the information (if necessary). The total annual respondent cost is estimated to be $119 ({[120 articulation agreements x 0.5 reviews per year] x [5 minutes] / 60 minutes} 5 hours x $23.76\*).

The consortium information will be reviewed bi-annually (i.e., once every two years) by the program sponsors to ensure that the point of contact information and the information on the articulation agreements are current. OA will send a form to the program sponsors with the existing information. It should take five minutes per member to review and update their information (if necessary). The total annual respondent cost for existing members of the consortium is estimated to be $499 ({[500 sponsor x 0.5 reviews per year] x [5 minutes] / 60 minutes} 21 hours x $23.76\*).

The consortium information will be reviewed bi-annually (i.e., once every two years) by each association to ensure that the point of contact information and information on the articulation agreements are current. OA will send a form to the associations with the existing information. It should take five minutes per form to review and update the information (if necessary). The annual respondent cost is $12 ({[10 associations x 0.5 reviews per year] x [5 minutes] / 60 minutes} 0.5 hours x $23.76\*).

\* The estimated hourly compensation rate for an administrative assistant (43-

6014) in the private sector was calculated by multiplying the median hourly wage of $18.28, by 1.30, to account for private-sector employee benefits. The hourly compensation rate for administrative assistant is $23.76. For the median hourly wage, see the Department’s BLS National Occupational Employment and Wage Estimates, May 2018, at: <http://www.bls.gov/oes/current/oes436014.htm> and for the Employer Costs for Employee Compensation, see BLS New Release, Table A., June 2019 at: <http://www.bls.gov/news.release/pdf/ecec.pdf>.

**E. Burden Summary**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Activity** | **Number of Respondents** | **Frequency** | **Total Annual Responses** | **Time Per Response** | **Total Annual Burden (Hours)**  **Rounded** | **Hourly Rate** | **Monetized Value of Respondent Time** |
| Two- and Four-Year Post- Secondary Institutions – RACC Application | 100 | Annual | 100 | 10 minutes | 17 | $23.76 | $404 |
| Two- and Four-Year Post- Secondary Institutions – Articulation agreement | 20 | Annual | 20 | 5  minutes | 2 | $23.76 | $48 |
| Two- and Four-Year Post- Secondary Institutions – RACC Application & File Transfer | 5 | Annual | 5 | 30 minutes | 3 | $23.76 | $71 |
| Two- and Four-Year Post- Secondary Institutions – Articulation Agreement Review | 60 | Biennial | 120 | 5 minutes | 10 | $23.76 | $238 |
| Registered Apprenticeship Sponsor – RACC Application | 50 | Annual | 50 | 10 minutes | 8 | $23.76 | $190 |
| Registered Apprenticeship Sponsor – Articulation Agreement Review | 250\* | Biennial | 500 | 5  minutes | 42 | $23.76 | $998 |
| Associations and Other Organizations – RACC Application | 10 | Annual | 10 | 10 minutes | 2 | $23.76 | $48 |
| Associations and Other Organizations –– Articulation Agreement Review | 5 | Biennial | 10 | 5 minutes | 1 | $23.76 | $24 |
| ***Unduplicated Totals*** | **500** | -- | **815** | -- | **85** | -- | **$2,021** |

*Data Source: Office of Apprenticeship past RACC collection data*

*.\* Includes plans with long standing articulation agreements.*

*13. Provide an estimate for 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 already reflected on the burden worksheet).*

The Department associates no burden cost with this information collection beyond the value of a respondent’s time.

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

It takes one Federal staff person approximately 30 hours per year to maintain the website and the three PDF collection forms to gather and track information for this collection (<https://doleta.gov/oa/racc.cfm>). Hence, the ongoing maintenance cost to the Federal government to maintain the current online form/website is **$2,112** ($70.40\*\* x 30 hours).

The annual cost of reviewing the anticipated 120 articulation agreements that will be added to the consortium on an annual basis is **$704** (120 agreements x 5 minutes, which equates to 10 hours x $70.40).

\*\*Federal government employee, GS-12, Step 5, basic hourly rate of $41.66 was multiplied by 1.69 to account for Federal Government employee benefits. The hourly compensation rate for a Federal government employee is thus $70.40. For the basic hourly rate, see <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/RUS_h.pdf> .The Department adjusted the wage rates using a loaded wage factor to reflect total Federal Government compensation, which includes health and retirement benefits. Based on internal data from DOL, a 1.69 loaded wage factor was used.

Federal government

Annual maintenance cost: $2,112

Annual Data input/review cost: $704

Total Annual Cost: **$2,816**

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

The annual burden hours have not changed.

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

All information provided will be available, upon agency staff review, on the website and accessible to the public.

*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. It will be displayed on the website and in any ETA/OA issuances.

*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 information collection does not employ statistical methods.