

**SUPPORTING STATEMENT FOR THE  
INFORMATION COLLECTION REQUIREMENTS OF THE  
STUDENT DATA FORM  
OFFICE OF MANAGEMENT AND BUDGET (OMB)  
CONTROL NO. 1218-0172 (April 2020)**

**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 21 of the Occupational Safety and Health Act of 1970 (the “OSH Act”) (29 U.S.C. 670) authorizes the Occupational Safety and Health Administration (“OSHA” or the “Agency”) to conduct education and training courses. These courses must ensure an adequate number of qualified personnel to fulfill the purposes of the OSH Act, provide them with short-term training, inform them of the importance and proper use of safety and health equipment, and train employers and workers to recognize, avoid, and prevent unsafe and unhealthful working conditions.

Under Section 21 of the OSH Act, the OSHA Training Institute (the “Institute”) provides basic, intermediate, and advanced training and education in occupational safety and health for Federal and State compliance officers, Whistleblower Investigators, agency professionals and technical-support personnel, employers, workers, organizations representing workers and employers, educators who develop curricula and teach occupational safety and health courses, and representatives of professional safety and health groups. The Institute provides courses on occupational safety and health, and Whistleblower Protection at its national training facility in Arlington Heights, Illinois.

Students attending Institute courses complete a one-page Student Data Form (SDF; OSHA Form 182, 12/13 edition). The form provides information under five major categories titled “Course Data,” “Personal Data,” “Organization Data,” “Supervisor Data,” and “Student Group.” The OSHA Directorate of Training and Education compiles, for each fiscal year, the following information from the “Course Data” and “Student Group” categories: Total student attendance at the Institute; the number of students attending each training course offered by the Institute; and the types of students attending these courses (for example, Safety, Health or Whistleblower Investigators Job Titles). The Institute recently developed a Whistleblower Investigator Training Program. The Job Title section of the form was modified because annual Operating Plan reporting now includes the number of Whistleblower Investigators trained at the Institute.

**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 uses the information compiled from the SDF by its Directorate of Training and Education to demonstrate, in an accurate and timely manner, that it is providing the training and worker education mandated by Section 21 of the OSH Act. This information is also helpful in evaluating training, and in making decisions regarding program/course revisions, budget support, and tuition costs. This form is used by non-Department of Labor personnel including the private sector for requesting enrollment in Institute courses. The information in the “Personal Data” and “Supervisor Data” categories allows OSHA to contact students who are residing in local hotels/motels if an emergency arises at their home or place of employment and to alert supervisors of a trainee’s injury or illness. The “Hotel Name and Location” data is used to contact the hotel in an emergency situation if the student was missing or failed to attend the course.

**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 burdens.**

Currently, students must complete the SDF manually because it is not available using advanced information technology and the collection is made in a classroom setting. OSHA will make this form available in fillable PDF format to ensure accuracy and legibility.

**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.**

The paperwork requirements of the SDF are specific to each student involved, and no other source or agency duplicates these requirements or can make the required information available to OSHA (i.e., the required information is available only from the student). This information is also necessary to document enrollments to maintain our certification as an Authorized Education and Training Facility under the International Association for Continuing Education & Training.

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

The information provided on the SDF has no direct impact on any business regardless of size because the agency collects the information as part of the training course attended by the student who completes the form; accordingly, this paperwork requirement does not have a significant impact on a substantial number of small entities.

**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 OSHA could not collect the information provided on the SDF, or obtained it less frequently, the agency would not have a record or data to use in: Documenting its timely and full compliance with section 21 of the OSH Act; planning timely program/course revisions, budget support, and tuition costs; and effectively managing student-related emergencies that arise during training.

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

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

- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The agency believes that no special circumstances exist that would cause it to collect the information required by the SDF in a manner, or using procedures, that differ from the description provided in Item 2 above.

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

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

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

As required by the Paperwork Reduction Act (44 U.S.C. 3506(c)(2)(A)), OSHA published a Federal Register notice on December 27, 2019 (84 FR 71478), soliciting comments from the public and other interested parties on the information collection requirements contained in the Student Data Form. The notice is part of a preclearance consultation program that provides the general public and government agencies with an opportunity to comment on the previously approved collections of information found in the Standard. The agency did not receive any public comments.

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

OSHA will not provide payments or gifts to the student who completes the SDF.

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

The agency provides no assurance of confidentiality regarding the information collected by the SDF because it believes that none of this information is confidential.

**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.**

The agency believes that none of the information collected by the SDF is sensitive.

**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 estimate for estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

An average of 4,000 students attended the OSHA Training Institute each fiscal year from FY 2014 through FY 2016. Each student completes one Student Data Form. OSHA estimates that it takes 5 minutes (5/60 hour) for a student to complete the form, resulting in a total of 333 burden

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hours. The cost to students/employers associated with completing the SDF is negligible because completion time per student is only 5 minutes (5/60 hour). The agency collects the information as part of the training course attended by the student who completes the form. The average student will attend only one course during the fiscal year. The typical federal employee (student) attending an OSHA Training Institute course is an Occupational Safety and Health Specialist (GS-7, Step 1<sup>1</sup>) with an hourly rate of \$17.42 per hour. Assuming that the hourly rate for non-federal workers (students) (e.g., from state-plan states or the private sector) is similar, then the total cost to complete the SDF is \$7,429 (i.e., 333 hours x \$17.42 = \$5,801).

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1 Office of Personnel Management. *Salary Table 2019-GS General Schedule*. [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf)

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<b>Estimated Annualized Respondent hour and Cost Burden Table</b>								
<b>Information Collection Requirements (Across Top of Rows)</b>	<b>Type or Respondent</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Total Number of Responses</b>	<b>Average burden per Responses (in Hrs.)</b>	<b>Total burden Hours</b>	<b>Average Hourly Wage Rate</b>	<b>Total Burden Cost</b>
Student Data Form	Occupational Safety & Health Specialist (GS-7, Step 1)	4,000	1	4,000	5/60	333	\$17.42	\$5,801
<b>TOTAL</b>		<b>4,000</b>	<b>1</b>	<b>4,000</b>	<b>5/60</b>	<b>333</b>	<b>\$17.42</b>	<b>\$5,801</b>

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

- **The cost estimate should be split into two components: (a) A total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

**If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) Prior to October 1, 1995; (2) to achieve regulatory compliance with requirements not associated with the information collection; (3) for reasons other than to provide information or keep records for the government; or (4) as part of customary and usual business or private practices.**

There are no additional costs to the respondents other than their time.

**14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into single table.**



OSHA estimates that the total annual cost to the Federal government of collecting and maintaining the information collected by the SDF is about \$4,957. The agency based this cost on the determinations provided in the following table:

Description	Total Hours	Hourly Rate <sup>2</sup>	Cost (rounded)
1 Management Services Specialist <sup>3</sup>	83.2 hours <sup>6</sup>	\$37.42	\$3,113
1 Office Services Assistant <sup>4</sup>	41.6 hours <sup>6</sup>	\$28.00	\$1,165
1 Professional <sup>5</sup>	8.26 <sup>6</sup> hours <sup>6</sup>	\$53.33	\$441
Annual record storage costs of forms	\$34.16/square foot x 5.5 square feet		\$188
Annual printing cost			\$50
<b>Total Annual Cost:</b>			\$4,957

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

The agency is requesting a 67 hour burden adjustment decrease (from 400 hours to 333 hours) as a result of decreasing the number of students attending the Institute from 5,000 to 4,000 students.

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<sup>2</sup> Office of Personnel Management. *Salary Table 2019-GS General Schedule Locality Pay Area of Chicago-Naperville, IL-IN-WI*. 2017. [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/CHI\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/CHI_h.pdf).

<sup>3</sup> **Title and grade (Management Services specialist, GS 11, Step 5):** based on spending 5% of time (2,080 hrs./yr. times 5% equals 104 hrs./yr., decreased by 20% = 83.2 hrs./yr., \$37.42/hr. times 83.2 hrs./equals \$3,113) on SDF activities.

<sup>4</sup> **Title and grade (Office Services Assistant, GS 8, Step 5):** based on spending 2 hrs./pay period (26 pay periods time 2 hrs. equals 52 hrs./yr., decreased by 20% = 41.6 hrs./yr.; \$28.00/hr. times 41.6 hrs./yr. equals \$1,165) collecting and processing the SDFs.

<sup>5</sup> **Title and grade (Occupational Safety and Health Specialist, or Industrial Hygienist, GS 13, Step 5):** based on Institute Instructors spending a total of 5 minutes in each of 129 courses (129 times 5 minutes (5/60 hrs.) equals 10.32 hrs./yr., decreased by 20% = 8.6 hrs./yr.; \$53.33 times 10.32 hrs./yr. equals \$441) distributing, explaining and collecting the SDFs..

<sup>6</sup> **Total Hours:** The hours are derived by the average processing time. Since 2017, there was a 20% decrease in processing time due to the average student enrollments.

<b>Table 1 Requested Burden Hour Adjustment</b>					
<b>Information Collection Requirement</b>	<b>Current Burden Hours</b>	<b>Total 2019 Requested Burden hour</b>	<b>Cost</b>	<b>Responses</b>	<b>Explanation of Adjustment</b>
Student Data Form	400	333	\$5,801	4,000	The number of responses decreased from 5,000 students to 4,000 students due to a 20% decrease in enrollments.

**16. For collections of information whose results will be published, outline plans for tabulations 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 the report, publication dates, and other actions.**

OSHA will not publish the information collected as a result to the Student Data Form.

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

OSHA will display the OMB and expiration date on the OSHA Form 182.

**18. Explain each exception to the certification statement.**

OSHA is not seeking an exception to the certification statement.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

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