Supporting Statement for the Information Collection Requirements of the
OSHA Training Institute Education Centers Program Data Collection
and
OSHA Outreach Training Program
Office of Management and Budget (OMB)
Control No. 1218-0262
(October 2020)

<u>This ICR is an extension of a currently approved data collection</u>.

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 directly, or through grants and contracts, education and training courses. These courses must ensure an adequate number of qualified personnel to fulfill the purpose of the Act, provide them with short-term training, inform them of the importance and proper use of safety and health equipment, and train employers and employees to recognize, avoid, and prevent unsafe and unhealthful working conditions.

Consistent with the authority of Section 21 of the OSH Act, the Agency created two educational programs, the OSHA Outreach Training Program and the OSHA Training Institute (OTI) Education Centers Program.

In 1971, the OSHA Outreach Training Program was established to rapidly disseminate basic safety and health information to workers. Today, the Outreach Training Program provides awareness training to workers on the recognition, control and prevention of occupational safety and health hazards. Trainers who successfully complete an OSHA trainer course are authorized to conduct 10- and 30-hour Outreach training courses on occupational safety and health hazards. This is a voluntary program. Students who complete Outreach courses receive a student course completion card from OSHA.

During the 1980s, the number of requests for training from private sector personnel and Federal personnel from agencies other than OSHA increased substantially and the demand eventually exceeded the capacity of the OSHA Training Institute. To meet the increased demand, in October 1992, the OSHA Training Institute Education Centers Program was created when OSHA began partnering with nonprofit training and educational institutions to conduct OSHA Training Institute courses for private sector personnel and federal personnel from agencies other than

OSHA. These approved centers are referred to as the OSHA Training Institute Education Centers or "OTI Education Centers."

Subsequently, additional organizations were selected through a series of national competitions. The program currently has 26 OTI Education Centers comprised of 37 member organizations.

The Directorate of Training and Education (DTE) is responsible for policy guidance, management, and administration of the OSHA Outreach Training Program and the OTI Education Center Program. . The Directorate of Training and Education collects and reports student training information on a monthly basis.

To be a participant in one of the educational programs, an individual or organization must provide the DTE, Office of Training Programs and Administration (OTPA), with certain information regarding their organization's or individual's experience and program data.

Please note that the cost to the respondent under (A13) is $3,528 which is not included in ROCIS because OSHA didn't discover the additional figure until after the 30-day Federal Register Notice published. The figures will be added officially as well as any other changes OMB requires prior to OMB action on the request.

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.

OSHA Training Institute Education Center – Information Collection

A. Title: **Application to become an OSHA Training Institute Education Center (OTI Education Center)**

Information Collected: Identifying data such as name; organization; address; consortium partners, if applicable; consortium partner address (s), if applicable; authority to apply; evidence of nonprofit status; status as a training organization; relevant occupational safety and health training experience; relevant curriculum development experience; administrative and occupational safety and health staff qualifications; ability to deliver OSHA OTI Education Center courses; description of training and testing facilities; description of training experience; copies of catalogues and other recruiting materials; description of systems to administer and monitor the OSHA Outreach Training Program; description of the applicant's recruitment, marketing, and registration plans; description of training facility's accessibility to transportation and lodging accommodation, and pricing of those services; information on host site locations; description of organization's ability to provide off-site courses; description of administrative capabilities to manage an OTI Education Center; ability to complete required reporting requirements; description of organizations ability to conduct course evaluations; and copies of the organization's non-discrimination policies for staff and students. **(A copy of Federal**

Register Notice - OSHA Training Institute Education Center; Notice of Competition and Request for Applications; May 5, 2017 is part of the request.)

Purpose: To obtain basic information about the applicant organization and application, to evaluate the qualifications of the applicants and their ability to serve the regional population and to determine ability to conduct OSHA courses for private and public sector personnel and federal personnel from agencies other than OSHA. To evaluate the applicant organization's competence to provide the proposed training (including the qualifications of the personnel to manage and implement the training).

B. Title: **OTI Education Centers Monthly Summary Report for the OTI Education Centers and Outreach Training Program Monthly Summary Report (OSHA Form 4-50.11)**

B1. Information Collected for OTI Education Center Courses conducted within the OTI Education Center's OSHA Region: OTI Education Centers must submit monthly information to the Directorate of Training and Education, Office of Training Programs and Administration, on the OTI Education Center's activities including: course numbers/titles, OTI Education Center name, dates and locations of training courses (training location, city, state, or country if outside the U.S.), class start and end dates, number of students trained, student contact hours, course lead instructor, instructional staff, number of students attempting exam, number of students taking re-test, number of students passing exam, average test score, and demographic student breakdown (Federal OSHA Personnel, Other Federal Agency Personnel, State OSHA Personnel, Other State Personnel, Private Sector Personnel, and Foreign Students).

B2. Information Collected for the Outreach Training Program classes: OTI Education Centers receive requests from Outreach trainers for cards to provide to their students who have successfully completed one of the OSHA Outreach Training Program courses (see item D, Outreach Training Program Report Forms). With this information, the OTI Education Centers report monthly the number of classes conducted and the number of students trained for each Outreach Training Program (Construction, General Industry, Maritime, and Disaster Site Worker) class. OTI Education Centers process requests and print Outreach Training Program trainer and student course completion cards.

B3. Information Collected for the Outreach Training Program Monitoring: OTI Education Centers are required to perform record and activity audits on Outreach trainers. The OTI Education Centers report monthly the date the monitoring activity was initiated and completed, the basis and type of monitoring activity, the number of classes included in the records audit, the type of training class observed, training hours observed, trainer information (name and address), audit results and follow-up actions. OSHA uses this information to monitor Outreach Training Program activity, and deter fraudulent activities.

B4. Information Collected for OTI Education Center Courses conducted out of the OTI Education Center's OSHA Region: OTI Education Centers must submit monthly information on the OTI Education Center's upcoming activities outside of the OSHA Region in which they are located, including: course numbers/titles, OTI Education Center name, dates and locations of training courses (training location city, state, or country, if outside the U.S.), number of students

projected to be trained, student contact hours, course lead instructor, other instructor name(s), point-of-contact at OTI Education Center, the submission date, and comments.

B5. <u>Information Collected for Outreach Training Program Exception Requests:</u> Authorized Outreach trainers may request an exception to the Outreach Training Program Requirements and Procedures to the OTI Education Centers. These exception requests are reported to DTE on the OTI Education Center's monthly summary report. Information collected includes; date of request, trainer name, organization, Outreach Training Program course, course state and end date, type of exception (class time extension, class size, alternative training method, and out of OSHA's geographic jurisdiction), OTI Education Center's decision, date of decision, and additional comments.

<u>Purpose</u>: Program management, oversight, and reporting. To monitor training activity and evaluate training conducted versus established goals and objectives of the Agency. To submit data for the annual workload summary for comparison with projected milestones. To monitor the implementation of new performance measures; track performance outcomes and efficiency measures; measure monthly, established annual and long-term performance targets, and information to prepare annual reports to Congress.

<u>C.</u> <u>Title</u>: **Attendance Documentation for OTI Education Centers**

<u>Information Collected</u>: The following is collected for each class: daily sign-in sheets (student first name, middle initial, and last name; course name and number; date; location (city and state the course was conducted); instructor name and signature, the name of the OTI Education Center who sponsored or conducted the training, and course prerequisite information (student employment history, copy of current Outreach trainer card or copy of official transcript), if applicable.

OSHA believes the daily sign-in sheet is not within the definition of "information" under 5 CFR 1320.3(h)(1). The daily training sign-in sheet does not entail additional burden other than to identify the student, the date, and the course name and signature of trainer. However, OTI Education Centers must also submit the prerequisite information completed and submitted by the student to the OTI Education Center, if applicable, which does require burden on the part of the OTI Education Center.

<u>Purpose</u>: Program management and oversight. To verify student attendance as reflected in monthly summary reports.

<u>D.</u> <u>Title</u>: **Statement of Compliance with Outreach Training Program Requirements ()**

<u>Information Collected</u>: OTI Education Centers are the primary administrators of the OSHA Outreach Training Program. As a heightened measure to address concerns regarding Outreach trainer misconduct or fraudulent activity with the Outreach Training Program, OSHA requests each OTI Education Center to gather a Statement of Compliance from each student who completes any of the train-the-trainer courses. / At the end of each trainer course, each student signs and returns the Statement of Compliance to the OTI Education Center and the OTI

Education Center retains the Statement of Compliance as part of the Outreach trainer's
permanent file.

OSHA believes the Statement of Compliance is not within the definition of "information" under
5 CFR 1320.3(h)(1). This Statement does not entail additional burden other than that necessary
to identify the respondent, the date and the nature of the instruction (training course information).
Therefore, the Agency has provided no burden hours as the Statement of Compliance is not
within the definition of "information" and/or generally includes customary and usual business
practices.

Purpose: Execution of the Statement of Compliance serves as a self-certification of authorized
Outreach trainer's knowledge of and compliance with the Outreach Training Program
Requirements and procedures and improve processing efficiency while maintaining program
integrity and deterring fraud.

E. Title: **Outreach Training Program Authorized Trainer List**

Information Collected: Authorizing OTI Education Center, OTI Education Center identifying
prefix number, authorized Outreach trainer name, mailing address, phone number, email address,
opt-in to be listed on OSHA's website, languages offered, website address, trainer industry
program authorization card number and date issued.

Purpose: To maintain a list of authorized Outreach trainers. This list is maintained for
investigation purposes and to assist individuals who are searching for Outreach Training
Program courses available in their vicinity. The OTI Education Centers provide this list monthly
to DTE.

F. Title: **Instructor and Staff Resumes** (this includes anyone who may be assigned to conduct
OSHA classes, contractor, subcontractor, employee, adjunct professor, etc.)

Information Collected: This information is collected from the OTI Education Centers and
includes résumés of current staff and position descriptions and minimum hiring qualifications for
all positions, whether filled or vacant, that may be assigned to conduct OSHA classes. Work
history, education, and other qualifications such as Certified Safety Professional (CSP),
Professional Engineer (PE), or Certified Industrial Hygienist (CIH).

Purpose: For program management and oversight and obtain instructor's knowledge and
experience with OSHA standards and their application to hazards and hazard abatement.

G. Title: **Course Curriculum upon Request by OSHA from OTI Education Centers**

Information Collected: Curriculum related content, manuals, and test questions.

Purpose: To monitor the program content and ensure quality and consistency. The materials are
helpful in developing future curriculum and meeting the needs of the Agency's product/service
users.

OSHA OUTREACH TRAINING PROGRM – Information Collection

<u>H.</u> <u>Title</u>: **Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker) (Outreach Training Report for Construction;, Outreach Training Report for General Industry; Outreach Training Report for Maritime Industry, and, Outreach Training Program Report for Disaster Site Worker,)**.

<u>Information Collected</u>: Trainer information (name, ID number, address, phone, email), Authorizing Training Organization, most recent trainer course, trainer card expiration date, type of course conducted (i.e., 10- or 30-hour construction; 10- or 30-hour general industry; 10- or 30-hour maritime; or disaster site worker); course information (indicate whether course was offered in Spanish, to Youth [age 18 or less], indicate the language if other than English or Spanish, training location and/or whether training conducted was related to an OSHA Alliance or Partnership); number of students, training site information (address, type of location); course duration (start and end times and dates), sponsoring organization, first and last name of students, trainer signature and date signed. The following information is requested to determine where student cards should be sent: [1]/ company name/department; address; city; state; zip; phone number; extension; email; copy of trainer card; topic list and time spent on each required, elective or optional topic.

Each Outreach training (i.e., the 10- and 30-hour construction, 10-and 30-hour general industry, 10- and 30-hour maritime, and disaster site worker) has a set of required, elective, and optional course topics. Because training topics covered and the length of time for each topic area may vary, the Outreach Training Program Report must be completed following each course conducted.

To maintain program integrity and deter fraud, OSHA Outreach trainers are required to maintain records which include student sign-in sheets, student addresses, and a copy of the documentation sent in to request student completion cards, including a list of the topics taught and the amount of time spent on each topic; a copy of the student course completion cards, a list of guest trainers and additional authorized Outreach trainers that instructed in the course.

<u>Purpose</u>: To monitor training activity and evaluate training conducted versus established goals and objectives of the Agency. These forms are necessary to review compliance with the Outreach Training Program Requirements and to request student course completion cards by the authorized Outreach trainer(s). In addition, this information is needed to improve processing efficiency while maintaining program integrity and deterring fraud.

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[1] / If the Outreach trainer already has an ID number and the address where student cards should be sent has not changed since the last request for students cards, the trainer may leave this section blank.

I.   Title: **Online Outreach Training Program Report**

Information Collected: Trainer information (name, ID number, address, phone, email), Authorizing Training Organization, most recent trainer course, trainer card expiration date, course information (indicate whether course was offered in Spanish, to Youth [age 18 or less], indicate the language if other than English or Spanish, training location and/or whether training conducted was related to an OSHA Alliance or Partnership); number of students, type of course conducted (i.e., 10- or 30-hour construction; 10- or 30-hour general industry); course duration (start and end times and dates), trainer signature and date signed. The following information is requested to determine where student cards should be sent: [2]/ company name/department; address; city; state; zip; phone number; extension; email; copy of trainer card; topic list and time spent on each required, elective or optional topic.

Purpose: To monitor online training activity and evaluate training conducted versus established goals and objectives of the Agency. This document is necessary to review compliance with the Outreach Training Program Requirements and procedures, and to request student course completion cards by the authorized Outreach trainer(s).

K Title: **Outreach Online Training Certification Statement**

Information Collected: Online organization and type of Outreach Training Program and changes made since the last certification that their online program was current.

Purpose: To ensure program is periodically reviewed and updated to reflect current OSHA Outreach Training Program Requirements and procedures.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

OSHA has endeavored to make the collection of the above-referenced information easy for program participants to complete and submit. Currently, program participants have the option to complete and submit the following data electronically:

> A. OTI Education Center Monthly Summary Report for OTI Education Centers and Outreach Training Program Monthly Summary Report

> B. Statement of Compliance with Outreach Training Program Requirements

> C. Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker Outreach Programs)

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[2] / If the Outreach trainer already has an ID number and the address where student cards should be sent has not changed since the last request for students cards, the trainer may leave this section blank.

   D. Online Outreach Training Program Report

   E. Outreach Trainer Lists

   F. Outreach Online Training Certification Statement

   G. Instructor and Staff Résumés

   H. Course Materials upon requests from OTI Education Centers

Due to the nature of the material requested, program participants are required to manually submit the following:

   A.   Application to become an OSHA Training Institute Education Center (OTI Education Center

   B. Attendance Documentation for OTI Education Centers
   C. OTI Education Center Course Curriculum

Regarding B, OTI Education Centers submit copies of student attendance documentation which includes multiple student signatures.

Whenever possible, the Agency is making efforts to allow electronic submissions in order to increase efficiency and consistency, and minimize the burden on program participants.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item A.2 above.

This information is not available in any other manner. The paperwork requirements of the documents listed above are specific to each student, trainer, or OTI Education Center involved, and no other source or agency duplicates these requirements or can make the required information available to OSHA.

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

The collection of this information does not have a significant economic impact on small entities. The information provided to OSHA from the OTI Education Centers and the Outreach Trainers imposes a minimal burden on the students, trainers, and/or OTI Education Centers. Whenever possible, the Agency is making efforts to allow electronic submissions in order to minimize the burden to the program participants.

6. Describe the consequences 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.

Without this information the agency would be unable to determine the extent to which OSHA's overall training goals and objectives are met.

Additionally, the number of workers receiving safety and health training via the OSHA Outreach Training Program may decline and the rate of accidents, injuries, and even death will likely increase. Without monitoring and reporting requirements, the Program may experience additional fraudulent activity.

7. Explain any special circumstance(s) that would cause information collection to be conducted in a manner:

(1) Requiring respondents to report information to the agency more often than quarterly;

Data collected monthly from OTI Education Centers provide appropriate levels of program oversight and an opportunity to timely reconcile reporting discrepancies.

Trainer data collected as courses are delivered to verify course information and ensure timely dissemination of student completion cards to course attendees.

Outreach trainer lists are required to ensure workers are informed where they can obtain safety and health training and to conduct investigations into alleged fraudulent activity.

(2) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

The Agency does not require respondents to prepare a written response to a collection of information in fewer than 30 days after receipt.

(3) Requiring respondents to submit more than an original and two copies of any document;

There are no instances where the Agency requires the submission of an original and two copies of any document.

(4) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

The OTI Education Centers record retention is based on their organizations' policy.

Outreach Training Program records are retained by OSHA, the OTI Education Centers, and the authorized Outreach trainers for five years to ensure the identification of students

and records associated with a trainer during the trainer's authorization period. This also
ensures students are able to obtain replacement cards when they are lost, damaged, or
misplaced.

**(5) 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;**

Not applicable.

**(6) Requiring the use of a statistical data classification that has not been reviewed
and approved by OMB;**

Not applicable.

**(7) 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**

Not applicable.

**(8) Requiring respondents to submit proprietary trade secrets, 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.**

Not applicable.

**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 instruction and record keeping,
disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed,
or reported.**

**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
notice in the *Federal Register* [85 FR 32052 on May 28, 2020] requesting public comments from
the public and other interested parties on its proposed extension of the collection of information
requirements contained in the OSHA Training Institute Education Centers Program and the

OSHA Outreach Training Program. The notice is part of a preclearance consultation program that provides interested parties with the opportunity to comment on OSHA's request for an extension by the Office of Management and Budget (OMB) of a previous approval of the collections of information found in the Standard. The Agency received no public comment on this notice.

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

The Agency will not provide payments or gifts to the respondents.

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

The Agency provides no assurance of confidentiality regarding the information that is collected from OTI Education Center applicants or data received from the OTI Education Centers.

Participants understand that if approved to participate in the OSHA Training Institute Education Center or the OSHA Outreach Training Program, their application/information becomes public record. Information collected in the application concerning financial disclosures remains confidential and is not available to the public.

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 information collection requirements do not involve the collection of sensitive information.

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 and aggregate the hour burdens.

Provide estimates of annualized cost to respondents of 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 13.

Summary of Burden Hours, Costs and Responses

Collection of Information requirement	Burden Hours	Costs	Avg. Annual Responses
Information Collection: OSHA Training Institute Education Center			
A. Application to become an OSHA Training Institute Education Center (OTI Education Center)	240	$10,707	4
B. OTI Education Centers Monthly Summary Report for the OTI Education Centers and Outreach Training Program Activities and Monitoring	1,872	$60,399	1,560
C. Attendance Documentation for OTI Education Centers	260	$6,484	520
E. Outreach Trainer List	312	$12,352	312
F. Instructor and Staff Resumes	2	$79	37
G. Course Curriculum Upon Requests by OSHA from OTI Education Centers	111	$9,366	37
Sub totals:	**2,797**	**$99,387**	**2,4970**
Information Collection: OSHA Outreach Training Program			
H. Outreach Training Program Report Forms (includes Construction, General Industry,	13,376	$529,556	53,504

Collection of Information requirement	Burden Hours	Costs	Avg. Annual Responses
Maritime and Disaster Site Worker Outreach Programs)			
I. Outreach Reporting Required for Online Trainers	172	$6,809	686
J. Outreach Online Training Certification Statement	32	$1,267	16
Subtotals	13,580	$537,632	54,204
Totals	16,377	$637,019	56,674

A detailed summary table for responses, burden hours, and costs is attached to the document.

OSHA's estimates of the burden hours and costs for each information collection requirement are calculated below. Costs and burden hours are rounded to total dollar and hour amounts. The number of applications, OTI Education Centers, and Outreach Trainers, and students trained are based on previous numbers submitted or the most current data available at this time. The Agency determined average wage rates for average hourly earnings, including benefits, to represent the cost of worker time. For the relevant occupational categories, OSHA adjusted the mean hourly earnings according to the Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Employment Statistics (OES), May 2019 (www.bls.gov/oes/) to allow for fringe benefits. To account for fringe benefits, we used the fringe benefit rate reported in BLS' Employer Costs for Worker Compensation (ECEC) news release for December 2019.   BLS reported that for private industry, fringe benefits accounted for 29.9 percent of total compensation and wages accounted for the remaining 70.1 percent. To calculate the loaded hourly wage for each occupation, thus we divide the mean hourly wage by 70.1 percent. In addition, the Agency uses the following wage rates in making the cost determination for the Information Collection Requests:

       Manager: (OES 11-1021) $59.15/.701 = $84.38
       Worker: (OES 25-0000) $27.75/.701 = $39.59
       Clerical: (OES 43-9061) $17.48/.701 = $24.94

OSHA Training Institute Education Center

A. Title: **Application to become an OSHA Training Institute Education Center (OTI Education Center).**

OSHA publishes a notice announcing the opportunity for interested nonprofit organizations to become an OTI Education Center. OTI Education Centers have the ability to extend their authorization with OSHA one time for an additional five years without submitting a new application if they met or exceeded all performance criteria in the previous five years. In 2017, 14 of the existing authorized OTI Education Centers were required to reapply. In 2017, the Agency received approximately 19 applications. Given OSHA only publishes notices approximately every five years, we have annualized the number of applications to 4 (19/5 years = 3.8).

Number of Respondents (Applications)	Number of Responses per Respondent	Total No. of Responses	Estimated Burden-Hours per Respondent	Total Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
4	1 time	4	10 hours	40	$84.38 (manager)	$3,375
4	1 time	4	40 hours	160	$39.59 (employee*)	$6,334
4	1 time	4	10 hours	40	$24.94 (clerical)	$998
Totals		**4**		**240**		**$10,707**

* Each application is reviewed by 2 staff-program analysts, GS-13s.

B. Title: **OTI Education Center Monthly Summary Report for the OTI Education Centers and Outreach Training Program Activities.**

B1. OSHA Training Institute Education Centers Reporting:

OTI Education Centers must submit monthly information to the Directorate of Training and Education (DTE), Office of Training Programs and Administration.

Based on the wage rates referenced above, each OTI Education Center expends approximately two hours per month preparing and submitting a monthly summary report. One hour is allocated by a general employee earning $39.59 per hour and the other hour is allocated towards the preparation of the monthly summary report by clerical staff earning approximately $24.94.

Number of Respondents (26 OTI Education Centers)	Frequency of Response	Number of Responses	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
26	Monthly (12)	312	1 hour	312	$39.59 (employee)	$12,352
26	Monthly (12)	312	1 hour	312	$24.94 (clerical)	$7,781
Totals		**312**		**624**		**$20,133**

B2. OSHA Outreach Training Program Reporting: OTI Education Centers collect Outreach trainer data (see item B, Outreach Training Program Reports) and process these requests. Outreach trainer requests for student cards are processed by the OTI Education Center where the Outreach trainer received training. This is reported to DTE each month by the OTI Education Center.

Number of Respondents (26 OTI Education Centers)	Frequency of Response	Number of Responses	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
26	Monthly (12)	312	1 hour	312	$39.59 (employee)	$12,352
26	Monthly (12)	312	1 hour	312	$24.94 (clerical)	$7,781
Totals		**312**		**624**		**$20,133**

B3. Information Collected for the Outreach Training Program Monitoring: OTI Education Centers are required to perform record and activity audits on authorized Outreach trainers and report the results monthly to the Directorate of Training and Education, Office of Training Programs and Administration.

Number of Respondents (26 OTI Education	Frequency of Response	Number of Responses	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)

Centers)						
26	Monthly (12)	312	30/60 hour	156	$39.59 (employee)	$6,176
26	Monthly (12)	312	30/60 hour	156	$24.94 (clerical)	$3,891
Totals		**312**		**312**		**$10,067**

B4. Information Collected for OTI Education Center Courses conducted out of the OTI Education Center's OSHA Region: OTI Education Centers are required to inform the Directorate of Training and Education, Office of Training Programs and Administration of any class they plan to conduct out-of-region to provide OSHA advanced notice, which OSHA can use to answer questions from other OTI Education Centers and the public.

Number of Respondents (26 OTI Education Centers)	Frequency of Response	Number of Responses	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
26	Monthly (12)	312	15/60 hour	78	$39.59 (employee)	$3,088
26	Monthly (12)	312	15/60 hour	78	$24.94 (clerical)	$1,945
Totals		**312**		**156**		**$5,033**

B5. Information Collected for Outreach Training Program Exception Requests

OTI Education Centers are required to inform the Directorate of Training and Education, Office of Training Programs and Administration of any exceptions requested submitted by authorized Outreach Training Program trainers for a change in Outreach classes including the OTI Education Center's decision regarding each exception request.

Number of Respondents (26 OTI Education Centers)	Frequency of Response	Number of Responses	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
26	Monthly (12)	312	15/60 hour	78	$39.59 (employee)	$3,088
26	Monthly (12)	312	15/60 hour	78	$24.94 (clerical)	$1,945
Totals		**312**		**156**		**$5,033**

C. Title: **Attendance Documentation for OTI Education Centers**

The Agency requires the OTI Education Centers to collect daily student sign-in sheets for each course conducted; and the Agency requests this information on a quarterly basis for a random number and type of classes.

Each student is required to sign their name next to their printed name on a daily sign-in sheet. OSHA also requires the instructor to sign the sign-in sheet to certify the attendance

documentation is accurate. Since all OTI Education Centers have electronic registration, the printed name of registered students is readily available.

OSHA believes the daily sign-in sheet is not within the definition of "information" under 5 CFR 1320.3(h)(1). The daily training sign-in sheet does not entail additional burden other than to identify the student, course date, and course name and signature of trainer. However, OTI Education Centers must also submit the prerequisite information completed and submitted by the student to the OTI Education Center, if applicable, which does require burden on the part of the OTI Education Center.

OSHA assumes it will take approximately 30 minutes (30/60 hour) for the OTI Education Centers to provide the daily sign-in sheet, along with the prerequisite information to OSHA. On average five classes from each OTI Education Center is audited per quarter.

Estimated Number Respondents (Courses Audited per quarter)	Frequency of Response	Number of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
130	Quarterly (4)	520	30/60 hour	**260**	$24.94 (clerical)	**$6,484**

E. Title: **Outreach Trainer List**

The OTI Education Center collects information regarding all authorized Outreach trainers. Since this information is readily available (Necessary information is provided upon successful completion of the trainer or update course), OSHA assumes it will take approximately 1 hour per month for the OTI Education Centers to prepare and submit this report electronically.

Estimated Number of Respondents (26 OTI Education Centers)	Frequency of Response	Number of Responses	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
26	Monthly (12)	312	1 hour	**312**	$39.59 (employee)	**$12,352**

F. Title: **Instructor and Staff Resumes (this includes anyone who may be assigned to conduct OSHA classes, whether a contractor, subcontractor, employee, adjunct professor, etc.)**

During the application process for new OTI Education Centers or as new staff is hired or changes are made, the Agency requires the OTI Education Centers to provide OSHA with a copy of the

resume of the instructor and/or their staff. The Agency encourages the submission of the resumes in an electronic format (via email). Since it is likely the OTI Education Center receives the resumes electronically, OSHA estimates it will take the OTI Education Center Director or their staff approximately 3 minutes (3/60 hour) to submit the required information. For purposes of estimating courses, the agency estimates that an OTI Education Center employee earns $39.59 per hour.

Estimated Number of Respondents (Resumes)	Frequency of Response	Number of responses	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
37	1	37	3/60 hour	**2**	$39.59 (employee)	**$79**

G. Title: **Course Curriculum Upon Requests from OTI Education Centers**

The program currently has 26 OTI Education Centers comprised of 37 member organizations. On an as-needed basis, the Directorate of Training and Education requests the OSHA Training Institute Education Centers provide course curriculum related content, manuals, and test questions to monitor program content and ensure quality and consistency. These materials are provided to the Directorate of Training and Education, Office of Training Programs and Administration.

Since the majority of the curriculum have already been created or are in existence, the Agency calculates the burden by using 3 hours as the average yearly total.

Estimated Number of Respondents (Member organizations) (per year)	Frequency of Response	Number of Responses	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
37	1	37	3 hours	**111**	$84.38 (manager)	**$9,366**

OSHA OUTREACH TRAINING PROGRAM COLLECTIONS OF INFORMATION

H. Title: **Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker Outreach Programs)**

Upon completion of each Outreach course, the trainer must submit information as stated under Item 2, B2 to issues the 10- and 30-hour Outreach cards. OSHA estimates that for each course the trainer will take 15 minutes (15/60 hour) to obtain, document and submit the required information. The number of courses (estimated at 53,504 annually) has been averaged over a three year period, 2017 through 2019.   For purposes of estimating costs, the Agency estimates that an Outreach trainer earns approximately $39.59 per hour:

Estimated Number of Respondents (Courses) per Year (averaged)	Frequency of Response	Number of Responses	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
53,504	1	53,504	15/60 hour	**13,376**	$39.59 (employee)	**$529,556**

I. Title: **Outreach Reporting Required for Online Trainer**

Upon completion of each online Outreach course, the online provider must collect information as stated under Item 2, E above. Depending on the number of online programs offered, the online providers provide a report, to either the Directorate of Training and Education, Office of Training Programs and Administration or their authorizing OTI Education Center. OSHA estimates the number of reports received per year at 686 and that for each course the online provider conducts, it will take approximately 15 minutes (15/60 hour) to obtain, document, and submit the required information. The number of reports has been averaged over a three year period, 2017 through 2019. For purposes of estimating costs, the agency estimates that an Outreach trainer earns $39.59 per hour:

Estimated Total Number of Respondents (Reports) per Year (averaged)	Frequency of Response Varies	Number of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
686	1	686	15/60 hour	**172**	$39.59 (employee)	**$6,809**

J. Title: **Online Training Program Statement of Certification**

At a minimum, an online Outreach training provider must provide to the Directorate of Training and Education a semi-annual report (essentially a negative report) or must immediately report any significant changes made to an online Outreach training program. The online Outreach training provider is required to sign a Statement of Certification that the online OSHA training courses have been conducted in accordance with the current OSHA Outreach Training Program Requirements and procedures, and document in detail any changes made. If no changes are implemented, the online Outreach training provider must provide the Directorate of Training and Education a negative report.

OSHA currently has 8 accepted online Outreach Training programs. OSHA estimates the average organization will take 2 hours per accepted program to obtain, document, and submit the required information. For purposes of estimating courses, the agency estimates that an employee earns $39.59 per hour:

Estimated Number of Respondents (Programs) per year	Frequency of Response	Number of Response	Estimated Burden-Hours per Respondent	Estimated Annual Burden Hours	Cost per hour	Estimated Annualized Costs (Rounded)
8	Semi-annual (2)	16	2 hours	**32**	$39.59 (employee)	**$1,267**

		Estimated Annualized Respondent Hour and Cost Burden						
Information Collection	Form Number (If applicable)	Number of Respondents	Number of Responses per Respondents	Total Number of Responses	Average Burden Per Response (In hours)	Total Burden Hours (Rounded)	Average Wage Rate	Total Burden Cost (Rounded)
OSHA TRAINING INSTITUTE EDUCATION CENTER								
A. Application to become an OTI Education Center								
Manager		4	1	4	10	40	$84.38	$3,375
Employee		4	1	4	40	160	$39.59	$6,334
Clerical		4	1	4	10	40	$24.94	$998
		Totals		4		240		$10,707
B. OTI Education Center Monthly Summary Report for the OTI Education Center & Outreach Training Program Activities								
B1. OTI Education Centers Reporting								
Employee		26	12	312	1	312	$39.59	$12,352
Clerical		26	12	312	1	312	$24.94	$7,781
		Totals		312		624		$20,133
B2. OSHA Outreach Training Program Reporting								
Employee		26	12	312	1	312	$39.59	$12,352
Clerical		26	12	312	1	312	$24.94	$7,781

		Totals		312		624	$20,133
B3. Information Collected for the Outreach Training Program Monitoring							
Employee		26	12	312	30/60	156	$39.59	$6,176
Clerical		26	12	312	30/60	156	$24.94	$3,891
		Totals		312		312		$10,067
B4. OTI Education Center Courses conducted out of the OTI Education Center's OSHA Region							
Employee		26	12	312	15/60	78	$39.59	$3,088
Clerical		26	12	312	15/60	78	$22,35	$1,945
		Totals		312		156		$5,033
B5. Information Collected for Outreach Training Program Exception Requests							
Employee		26	12	312	15/60	78	$39.59	$3,088
Clerical		26	12	312	15/60	78	$24.94	$1,945
		Totals		312		156		$5,033
C. Attendance Documentation for OTI Ed. Centers							
Clerical		130	4	540	30/60	260	$24.94	$6,484
E. Outreach Trainer List							
Employee		26	12	312	1	312	$39.59	$12,352
F. Instructor and Staff Resumes							
Employee		37	1	37	3/60	2	$39.59	$79

G. Course Curriculum Upon Requests from OTI Ed. Centers								
Manager		37	1	37	3	111	$84.38	$9,366
OTI Education Center Totals				*2,470*		*2,797*		*$99,387*
OSHA OUTREACH TRAINING PROGRAMS COLLECTION OF INFORMATION								
H. Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker)								
Employee		53,504	1	53,504	15/60	13,376	$39.59	$529,556
I. Outreach Reporting Required for Online Trainer								
Employee		686	1	686	15/60	172	$39.59	$6,809
J. Online Training Program Statement of Certification								
Employee		8	2	16	2	32	$39.59	$1,267
OSHA Outreach Training Programs Totals				*54,204*		*13,580*		*$537,632*
TOTALS				**56,674**		**16,377**		**$637,019**

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 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.

Due to the nature of the material requested, program participants are required to manually submit (mail in) the following, which causes the respondents to occur postage costs:

A. Application to become an OSHA Training Institute Education Center (OTI Education Center = **$630**
B. Attendance Documentation for OTI Education Centers = **$2,184**
C. OTI Education Center Course Curriculum = **$714**
Total Annualized Respondent Costs = $3,528

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

OSHA estimates that the total annual cost to the Federal government of collecting, analyzing, and maintaining the information collected on these forms is (1,212 + 82,901) = $84,113.

Annual record storage costs for these forms is estimated at ($34.62/square foot x 35 square feet) = $1,212.

For each collection, several government employees at differing grades may be involved in processing, analyzing, and if necessary preparing reports. OSHA estimates that 1,794 hours are spent on the collection of information requirements contained in the OSHA Training Institute Education Center Program, and the Outreach Training Program. The Agency determined that a GS-12, Step 5[3] ($46.21) represents the average wage rate for the government staff working on these collections of information requirements. The total cost to the Federal government is $82,901 (1,794 hours x $46.21 = $82,901). See the table below for a breakdown of hours.

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[3] Office of Personnel Management, 2020 General Schedule, CHICAGO-NAPERVILLE, IL-IN-WI
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/CHI_h.pdf

Burden Hours used to Calculate the Total Cost to the Federal Government

Collection of Information requirement	No. of Responses	Average Time per Response (In hours)	Total Burden Hours
A. Application to become an OSHA Training Institute Education Center (OTI Education Center)	Review 4 Applications	18 hours	72
B. OTI Education Center Monthly Summary Report, including Outreach Reporting	Review Summary Reports (26 x 2 x 12 = 624)	1 hour	624
C. Statement of Compliance with Outreach Training Program Requirements" (proposed)	Not Applicable: These Requirements are processed at the OTI Education Centers and costs are assumed under Item 12.		N/A
D. Outreach Training Program Report Forms (includes Construction, General Industry, Maritime and Disaster Site Worker Outreach Programs)			

Collection of Information requirement	No. of Responses	Average Time per Response (In hours)	Total Burden Hours
E. Outreach Reporting Required for Online Trainers	Review and process 686 student completion card requests and report same	30/60 hours	343
F. Outreach Trainer List	Ensure receipt of Outreach Trainer Lists monthly from 26 OTI Education Centers and upload to main database (26 x 12 = 312)	1.0 hour	312
G. Attendance Documentation for OTI Education Centers	OTI Education Centers – 104 requests for class documentation	4 hours to analyze, compare to monthly reports, and document	416
H. Outreach Online Training Certification Statement	Analyze Online Training Certifications 16	30/60 hour	8

Collection of Information requirement	No. of Responses	Average Time per Response (In hours)	Total Burden Hours
I. Instructor and Staff Resumes	Review new resumes/ approximately 37	30/60 hour	19
TOTAL			**1,794**

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

The Agency is requesting an adjustment increase of 464 in burden hours (from 15,913 hours to 16,377 hours) resulting from an increase in the number of students trained and courses offered.

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 the report, publication dates, and other actions.

Not applicable.

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.

The expiration date will be displayed on the data collected.

18. Explain each exception to the certification statement.

There are no exceptions 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.