

INFORMATION COLLECTION REQUEST (ICR):
OMB 83-I SUPPORTING STATEMENT

A. Justification

1. *Information to be collected and circumstances that make the collection of information necessary*

The U.S. Consumer Product Safety Commission (CPSC) is an independent federal regulatory agency that was created in 1972 by Congress to protect the public against unreasonable risks of injuries and deaths associated with consumer products, assist consumers in evaluating the comparative safety of consumer products, develop uniform safety standards for consumer products, and promote research and investigation into the causes and prevention of product-related deaths, illnesses, and injuries.

Consistent with the OMB Memorandum on the Use of Challenges and Prizes to Promote Open Government (M-10-11, March 8, 2010), the CPSC intends to establish contests and give awards to members of the public to further the mission of the CPSC. The purposes of the proposed contests and awards range from increasing the knowledge and awareness of schoolchildren of certain safety hazards, such as carbon monoxide poisoning, to recognizing outstanding consumer product safety accomplishments of scientists, business leaders, entrepreneurs, and others who have demonstrated support of the CPSC's product safety mission. The CPSC awards and contests will highlight excellence in consumer product safety to motivate, inspire, and guide others, including companies across the supply chain; to increase the number and diversity of the individuals, organizations, and teams that are addressing consumer product safety issues; to educate children and consumers about safety hazards; and to attract more public interest and attention to the issues involving consumer product hazards and safety.

The CPSC is seeking OMB approval for a generic clearance for CPSC's contests and awards. The information to be collected from contestants and award nominees or nominators includes contact and background information necessary to conduct a contest or award program. Limited background or biographical information similar to data found on a resume, such as a nominee's education and work experience, may be requested for some contests or awards. Additionally, the substantive entries that are the subject of the contests or awards, such as essays, posters, drawings, and videos, descriptions of products, services, or invention descriptions, and statistics on product or service performance or impact, may be requested from contestants and award nominees.

2. *Use and sharing of collected information, and impact on privacy*

Along with the substantive contest or award submission, the contestant or award nominee will provide contact information, such as email addresses, mailing addresses, and phone numbers for the purpose of administration of the contest or

award programs. This contact information will be shared with CPSC staff, third-party advisors to the CPSC, or contractors involved in the contest or award program, and will be used for the sole purpose of contest or award administration. Contestants can make submissions to the CPSC electronically, through the postal mail service, or through other commercial delivery services.

Judging of the various contest or award programs will generally be conducted by CPSC staff, but may include outside judges. The submissions may be available in various forms to the judges, including in an electronic database and/or in hard copy. Contest or award programs involving children will require parental permission to publicly display or advertise certain information, including the contestant's name, age, grade, school affiliation, and state of residence.

For the purposes of displaying any child's submission on the CPSC website, only a child's first name, grade, and state of residence will be visible to the public. The CPSC will not publicly share any other information pertaining to a child. After selection of the contest and award finalists, the physical and electronic submissions will be stored for a two-year period to satisfy the CPSC's record disposition management requirements. After this two-year period, all records will be discarded and destroyed.

3. Use of information technology (IT) in information collection

Some contest and award programs will allow electronic submissions in lieu of, or in addition to, standard postal delivery methods.

4. Efforts to identify duplication

Because the CPSC would issue the awards and because no other federal agency has the same mission as the CPSC, no duplication is possible. Nevertheless, the CPSC will be mindful of activities by other federal agencies that are similar.

5. Impact on small businesses

All contest and award programs will be strictly voluntary, and any qualified individuals or businesses that choose to participate may do so. Small businesses are encouraged to participate. The CPSC does not expect any negative, disparate impact on small businesses from any contest or award initiative.

6. Consequence to federal program or policy activities if collection is not conducted or is conducted less frequently

The CPSC believes that conducting various contests and award programs can increase awareness in communities and in individual homes of the hazards of certain products or the misuse of products, and thereby increase consumer safety, especially with contests established for children. Moreover, the CPSC believes that contests and awards can motivate competition in the private sector to innovate processes, products, and services, with the goal of reducing hazards and increasing consumer product

safety. Failure to collect the information would impair the CPSC's ability to complete a contest or to operate an awards program effectively. Each contest or award program should result in a one-time collection of information, although a second submission may be needed for selecting finalists and award recipients.

7. *Special circumstances requiring respondents to report information more often than quarterly, or to prepare responses in fewer than 30 days*

There are currently no circumstances to warrant requiring contest and award participants to report or prepare a response in fewer than 30 days. The CPSC expects to advertise its contests and awards for at least a few months in order to maximize response rates.

8. *Agency's Federal Register Notice and related information*

The CPSC issued a Federal Register notice on July xx, 2020. No substantive comments were received.

9. *Decision to provide payment or gift*

To promote active participation and response rates, some contests, including those aimed at schoolchildren, may offer payments, savings bonds, or prizes in full compliance with federal appropriations law.

10. *Assurance of confidentiality*

The information submitted would be subject to the Freedom of Information Act and the CPSC's statutes and regulations pertaining to information disclosure.

11. *Questions of a sensitive nature*

There will be no questions of a sensitive nature.

12. *Estimate of hour burden to respondents*

The CPSC did examine a similar supporting statement prepared by the Department of Education for its outreach contests and believes that, conceptually, the CPSC's contests and awards are similar. Thus, the CPSC is adopting the same estimates as those used by the Department of Education, but, insofar as follow-up contacts with respondents are concerned, has doubled the estimate from 1 to 2 hours because the information sought from finalists may involve more information than that needed to confirm eligibility under the Department of Education's program.

The CPSC estimates up to 500 contest or award participants each year. The estimated time to complete a contest or award submission is five hours. In addition, approximately 20 applicants may be asked to provide additional information, a task that may take up to two additional hours to complete. Therefore, the total estimated

burden on respondents is 2,540 hours ((500 participants x 5 hours/participant) + (20 applicants x 2 hours/participant) = 2,500 hours + 40 hours = 2,540 hours).

The estimated total annual cost of the burden to all respondents is \$95,834.20. This estimate is based on the total estimated burden on respondents (2,540 hours) multiplied against a total hourly compensation rate for all civilians of \$37.73 per hour (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," March 2020, Table 2, Total compensation for all civilian workers: <http://www.bls.gov/ncs/>), resulting in a total of \$95,834.20.

13. Estimate of total annual cost burden to respondents

There are no costs to respondents beyond those presented in Section A.12. There are no operating, maintenance, or capital costs associated with the collection.

14. Estimate of total annual costs to federal government

Ten staff members would support the contest or award activities annually. The CPSC estimates that each staff member will spend approximately six hours per work week for six months on such contest or award activities. Of the ten staff members, the CPSC believes that seven will be General Schedule (GS) employees and three will be Senior Executive Service (SES) employees. Accordingly, for seven GS employees, the estimated total annual cost to the federal government is determined as follows:

- 7 employees x (6 hours/week/employee x 24 weeks) = 1,008 hours;
- The average hourly wage rate for a mid-level salaried GS-15 employee in the Washington, DC metropolitan area (effective as of January 2020) is \$77.49 (GS-15, step 5). This represents 68.3 percent of total compensation (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," March 2020, Table 2, percentage of wages and salaries for all civilian management, professional, and related employees: <http://www.bls.gov/ncs/>). Adding an additional 31.7 percent for benefits brings average hourly compensation for a mid-level salaried GS-15 employee to \$113.46.
- \$113.46/hour x 1,008 hours = \$114,367.68.

For the SES employees:

- 3 employees x (6 hours/week/employee x 24 weeks) = 432 hours;
- Assuming the employees are at the Level III level for SES employees, the hourly rate for such an employee is approximately \$86.97/hour. This represents 68.3 percent of total compensation (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," March 2020, Table 2, percentage of wages and salaries for all civilian management, professional, and related employees: <http://www.bls.gov/ncs/>). Adding an additional 31.7 percent for benefits brings average hourly compensation for a Level III SES employee to \$127.34.
- \$127.34/hour x 432 hours = \$55,010.88.

So the estimated total annual cost to the federal government is \$114,367.68 + \$55,010.88 = \$169,378.56.

15. Program changes or adjustments

There is no change in the estimated burden of the generic ICR.

16. Plans for tabulation and publication

Not applicable

17. Rationale for not displaying the expiration date for OMB approval

The agency does not seek an exemption from displaying the expiration date.

18. Exception to the certification statement

Not applicable.

B. Collections of Information Employing Statistical Methods

The information collection does not employ statistical methods.