

**SUPPORTING STATEMENT FOR
Department of Labor Events Management Platform
OMB CONTROL NUMBER: 1290-0002**

This ICR requests a three-year extension of the information collection under OMB Control No. 1290-0002. The information collection requirements are contained in various locations within 29 Code of Federal Regulations (CFR) Sections 37 and 38.

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 Department of Labor (DOL or the Department) periodically sponsors events that require prospective attendees. These data will help ensure that attendees receive suitable accommodations (e.g., a large enough room with enough seating) while attending the DOL event. In addition, the information will help the DOL keep track of the types of entities that attend agency events. Such information can assist when developing lists of stakeholders.

In addition, the Office of Small and Disadvantaged Business Utilization (OSDBU) administers DOL responsibilities to ensure procurement opportunities for small, small disadvantaged, women-owned, HubZone, and small disadvantaged veteran-owned small businesses. OSDBU also serves as the Department's central referral point for small business regulatory compliance information and questions. The Vendor Outreach Session Registration Form (VOS) will be an information collection component of the larger DOLEMP.

Federal agencies are required to promote procurement opportunities for small businesses and Section 8(a) businesses of the Small Business Act, as amended by Public Law 95-507 (Sections 8 and 15) and Public Law 100-656 (Sections 502 and 503). The Federal Acquisition Streamlining Act of 1994 (Public Law 103-355) mandates similar efforts for small women-owned businesses. Public Law 106-50 created the program for service-disabled veteran-owned small businesses. Public Law 105-135 established the HUBZone program and Public Law 85-536 established HUBZone goals. The Small Business Regulatory Enforcement Fairness Act of 1996 (Public Law 104-121) requires Federal agencies to make available to small businesses compliance guides and assistance on the implementation of regulations and directives of enforcement laws they administer.

Further, Executive Order 13170 requires that the Department take a number of actions to increase outreach and maximize participation of small disadvantaged businesses in their

procurements. Executive Order 13157 strengthens the executive branch's commitment to increased opportunities for women-owned small businesses.

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 Department uses the Department of Labor Events Management Platform (DOLEMP) information to register participants at DOL events. The collection method (i.e. voluntary on-line registration) remains unchanged. The VOS component gathers and manages information for two OSDBU constituent groups: small businesses and trade associations as well as other key populations associated with the small business community. The constituent groups have the opportunity voluntarily to provide to the OSDBU information about their organizations Via this platform. OSDBU and DOL agencies use this information to:

- maximize communication with the respective constituent groups regarding relevant OSDBU and DOL programs, initiatives, procurement opportunities and compliance assistance;
- track services and solicit feedback on customer service to group members; and
- facilitate registration of group members participating in OSDBU-sponsored activities; and, for security purposes, to facilitate tracking of attendees at Vendor Outreach Sessions (VOS) – outreach events that are held on U.S. Government property.

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.

In compliance with the Government Paperwork Elimination Act, DOLEMP information is collected via an electronic website. Registrants can visit the Web site and voluntarily complete an automated registration form. The advantages of using an on-line Web site are:

- easy access by respondents;
- uniform collection of data to facilitate comparison and analysis;
- more manageable (paperless) method for retaining and retrieving constituent data; and
- accessibility for OSDBU and DOL procurement officials.

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.

Registrants use the DOLEMP to obtain registration information for DOL events. This information is not available from any other source.

The VOS portion of the DOLEMP is similar to the government-wide System for Award Management (SAM) which is managed by the General Services Administration's Integrated Award Environment. However, the DOLEMP is designed to gather information (e.g. small business certifications and contact information) on vendors interested in doing business with the DOL. The DOL is not aware of any systems that provide communication with key constituent groups that pertain to DOL's acquisition opportunities and initiatives other than the VOS.

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

Many of the respondents to this information collection will be small entities. To limit the burden, this information will be collected via automated Web-based forms. This information collection does not have a significant economic impact on 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.

A registrant enters information in only once per event. If the information were not collected, persons would have no way of registering for DOL events, impacting DOL outreach and compliance assistance efforts. In addition, the effectiveness of the OSDBU to serve the two identified constituency groups will be adversely affected. Allowing registrants an opportunity to enter their own information helps to ensure that the information gathered is more accurate and more timely.

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 statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances regarding this information collection.

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.

The Department published a Federal Register notice on 11/6/2020 (85 FR 71106) to solicit comments regarding to this information collection. No comments were received.

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

Neither payments nor gifts are provided to respondents.

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

No express assurance of confidentiality is provided, as DOL meetings are public; however, DOL would only release information after redacting information in accordance with the Freedom of Information Act. For example, personal identifying information could be construed as being exempt from disclosure and withheld as constituting an unreasonable invasion of personal privacy. Where a list of attendees will be made available, the DOLEMP can include a checkbox allowing a registrant have his or her name withheld from the list.

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.

There are no questions of a sensitive nature.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the 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.**

The Department notes that most DOL events do not require information in excess of basic self-identifying information meeting the exception to the definition of “information” codified in regulation 5 CFR 1320.3(h)(1). The DOL claims no burden for such responses.

For purposes of this ICR, the DOL assumes 1,200 persons will register for some event that asks for PRA-applicable information in order to attend. This information is readily available and does not require extensive research. The DOL estimates each response will require no more than 5 minutes to complete. The DOL also assumes approximately 700 responses will come from the private sector; 300 from State, Local, and Tribal Governments; and 200 from individuals.

1,200 responses x 5 minutes = 100 hours.

For database entry purposes, the DOL assumes about 90 percent of events cleared under this ICR will not require an additional submission to the OMB, because the events will not request information beyond the basic template. The DOL has entered three information collections (Events Management Platform Data Fields—Private Sector, Events Management Platform Data Fields—State, Local, and Tribal Governments, and Events Management Platform Data Fields—Individuals or Households) into the database to cover this burden.

The original VOS hour burden was based on a pilot test of five small businesses conducted during the planning stages of the original VOS and included time to research and retrieve information. In the pilot, an average of seven (7) minutes was required to complete the registration information and an average of two (2) minutes was required to update the information. The DOLEMP VOS works in the same way, and the burden is assumed not to have changed.

The number of VOS respondents (1,000) and the number of VOS responses (2,000) differ because it is likely that some respondents will update their registration information more than once per year. For purposes of this ICR, DOL assumes all respondents will update their information once

Registration for Small Businesses and Trade Associations:

1,000 initial responses x 7 minutes = 117 hours
1,000 update responses x 2 minutes = 33 hours
Total VOS Hours = 150 hours

Total burden hours: 100 generic event registration hours + 150 VOS hours = 250 total hours.

Registrants can come from a variety of backgrounds; however, given the types of events likely requiring a PRA covered response the DOL believes a significant portion will be in management, professional, or related fields. The value of respondent time has been calculated accordingly.

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| Burden Summary |
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| Activity | Number of Respondents (1) | Number of Responses per Respondent (2) | Total Number of Responses (1)*(2)=(3) | Average Burden Hrs. & Cost Per Response ¹ (4) | Total Burden Hours & Total Cost (3)*(4)=(5) |
|---|------------------------------|---|--|---|--|
| Events Registration | | | | | |
| Event Registration | 700 | 1 | 700 | 5 minutes; \$0 | 58 hrs.; \$0 |
| Event Registration (State, Local, and Tribal Governments) | 300 | 1 | 300 | 5 minutes; \$0 | 25 hrs.; \$ |
| Event Registration (Individuals and/or Households) | 200 | 1 | 200 | 5 minutes; \$0 | 17 hrs.; \$164,904 |
| Sub-total for Event Registration | 1,200 | | 1,200 | | 100 hrs.; \$ |
| Vendor Outreach | | | | | |
| Vendor Outreach (Initial) | 1,000 | 1 | 1,000 | 7 minutes; \$0 | 117 hrs.; \$0 |
| Vendor Outreach (Updates) | 1,000 | 1 | 1,000 | 2 minutes; \$0 | 33 hrs.; \$0 |
| Sub-total for Vendor Outreach | | | 1,000 | | 150 hrs.; \$0 |
| TOTAL | 2,200 | | 3,200 | | 250 hrs.; \$ |

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 service 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**

¹ The estimated hourly cost (salary plus benefits) provided in this section is based on the salary figures for a GS-13 (Step 10) federal employee in CY2020 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf). DOL staff estimates that this salary is representative of the average vendor's employee involvement and compensation for each response. The hourly estimates for salary plus benefits are \$63.95/hour.

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.**

The Department does not foresee any capital or start-up costs related to this information collection nor does the Department foresee any requisite purchase of equipment or contracted services outside of normal business activities.

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), 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 a single table.

The Department assumes federal staff at the GS-13 grade, step 4 in Washington, DC will manage the application. The Department also assumes that that level of federal employee will typically require 200 hours/year in efforts to manage the application. The hourly rate is \$54.65.

System Management Costs: 200 hours x \$54.65 = \$10,930.

Additionally, the Department assumes that federal staff at grade level GS-7, step 4 in will spend 15 minutes to create an event in the system. An additional 45 minutes per event is expected to be spent processing responses, the average grade expected to be the same. Total event processing time, thus, is expected to be one hour per event. Events can be held anywhere in the country; therefore, the hourly rate is \$23.02. The DOL also assumes each event will have an average of 25 attendees; thus, based on expecting 1,200 responses, the DOL estimates registrations will be sought for 48 events per year.

Per Event Cost: 1 hour x 48 events x \$23.02 = \$1,105.

Total Federal costs are estimated to be \$12,035 (\$10,930 + \$1,105).

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

There are no changes to reporting or recordkeeping requirements in this information collection request.

However, the Department is requesting 4,000 responses and 500 hours of available burden (within OMB Control Number 1290-0002) due to a predicted rise in events that will require registration and vendor outreach.

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 report, publication dates, and other actions.

There are no tabulating, statistical, tabulating analysis, or publication plans for the collection of information. Lists of small businesses with identifying information will be provided to DOL agencies on a quarterly basis (internal distribution only).

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.

Not applicable. The expiration date will be displayed on the website forms.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.