

**SUPPORTING STATEMENT FOR  
Registration and Equal Employment Opportunity in Apprenticeship Programs**

**OMB CONTROL NO. 1205-0223**

This Information Collection Request (ICR) seeks to revise the currently approved ICR under OMB Control No. 1205-0223, titled “Title 29 CFR Part 29 -- Labor Standards for the Registration of Apprenticeship Programs.” The revised ICR differs from the currently approved ICR in that the volume of information collected in the proposed ICR has increased to include (1) a new information collection instrument relating to state program and apprentice registration; and (2) the information collection requirements approved under OMB Control No. 1205-0224 (titled “Equal Employment Opportunity in Apprenticeship Training”). Accordingly, the ICR title has been changed from “Title 29 CFR Part 29 -- Labor Standards for the Registration of Apprenticeship Programs” to the “Registration and Equal Employment Opportunity in Apprenticeship Programs” to accurately reflect the collection of information contained in this ICR. The U.S. Department of Labor (Department) will submit a request to discontinue the ICR approved under OMB Control No. 1205-0224 once OMB approval is granted on this revised ICR.

**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.**

Registered apprenticeship is a combination of on-the-job learning and related instruction in which workers learn the practical and theoretical aspects of a highly skilled occupation and earn a competitive wage that increases as they acquire workplace-relevant skills. Apprenticeship programs are sponsored voluntarily by individual employers, employer associations, or joint apprenticeship training committees that partner organized labor with employers.

The National Apprenticeship Act (NAA) of 1937, (29 U.S.C. 50), authorizes the Secretary of Labor (Secretary) to “formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices.” The NAA can be accessed on the Department’s website at: <https://www.dol.gov/agencies/eta/apprenticeship/policy/national-apprenticeship-act#amendments>. The regulations governing labor standards for the registration of apprenticeship programs (set forth at Title 29 Code of Federal Regulations (CFR) part 29, subpart A (Registered Apprenticeship Programs)) and Equal Employment Opportunity (EEO) in Apprenticeship (set forth at Title 29 CFR part 30) are intended to provide for more uniform training of apprentices and to promote equal opportunity in apprenticeship.

The responsibility for formulating and promoting these labor standards lies with the

Department's Employment and Training Administration's (ETA) Office of Apprenticeship (OA). As part of its duties, OA registers apprenticeship programs that meet certain minimum labor standards and oversees the National Apprenticeship System. Federal staff members are directly responsible for registering apprenticeship programs and apprentices in 25 OA states and providing technical assistance and oversight to 29 State Apprenticeship Agencies (SAAs). The SAA states/territories have voluntarily requested recognition from the Secretary to serve as the entity authorized to register and oversee state and local apprenticeship programs for Federal purposes. Therefore, in accordance with the Department's Registered Apprenticeship regulations, each SAA state/territory has been charged with the responsibility of registering apprenticeship programs and apprentices.

Title 29 CFR Part 29, subpart A (part 29, subpart A) implements the NAA by setting forth labor standards that safeguard the welfare of apprentices by prescribing policies and procedures concerning the registration, cancellation, and deregistration of apprenticeship programs; the recognition of SAAs as Registration Agencies; and matters relating thereto. On October 29, 2008, the Department amended part 29 (now subpart A) to provide a framework that supports an enhanced, modernized apprenticeship system. 73 FR 64402. These regulations can be accessed on the Department's website at:  
<https://www.dol.gov/sites/dolgov/files/ETA/apprenticeship/pdfs/FinalRule29CFRPart29.pdf>.

The regulations at part 29, subpart A contain the following information collection requirements subject to the Paperwork Reduction Act:

- Section 29.3(a) provides that an apprenticeship program is eligible for registration for various Federal purposes only if it is in conformity with the apprenticeship program standards published in subpart A; for an apprenticeship program to be determined as being in conformity with the apprenticeship program standards, the program must be registered with OA or a recognized SAA.
- Section 29.3(b)(1) provides for the registration of an apprenticeship program and apprentice. Program registration not only assures industry consistency relative to the skill sets of the apprenticeable occupation and related instruction, but also safeguards the welfare of apprentices through this consistency and uniformity.
- Section 29.3(b)(2) provides that an apprenticeship program must conform to the equal employment opportunity requirements under Title 29 CFR part 30.
- Section 29.3(c) provides for the registration of apprentices to assure that these individuals receive the proper agreed upon skilled training and to make possible the granting of recognition to the individuals for the training received.
- Section 29.3(c)(2) provides for the filing of a list of apprentices rather than individual agreements.

- Section 29.3(d) provides for a list to be used to certify that an apprentice is eligible for probationary employment.
- Section 29.3(e) provides that sponsors must notify the appropriate Registration Agency of the completion of an apprenticeship program, transfers, and the cancellation or suspension of any apprenticeship agreement. This provision ensures that apprentices have not been terminated unjustly, acknowledges transfers or changes to an apprentice's registration, allows for a quality check of the apprenticeship program, and recognizes apprentices that have completed the apprenticeship program.
- Sections 29.3(g) and (h) provide for the provisional approval, permanent registration, and subsequent reviews of apprenticeship programs to ensure conformity with the regulations and to assure the quality of the apprenticeship programs.
- Section 29.3(i) provides that program modifications do not adversely affect apprentices from receiving proper training in accordance with the agreed upon program standards.
- Section 29.3(j) provides that all appropriate parties are properly involved in the operation of an apprenticeship program including ensuring proper representation of apprentices in a program. This provision is consistent with the NAA, which calls for bringing together employers and labor for the formulation of programs of apprenticeship.
- Section 29.3(k) provides that apprenticeship programs proposed for registration by an employer or group of employers have the same opportunity for program registration as those proposed programs with collective bargaining agreements.
- Section 29.5 specifies those standards of apprenticeship that are appropriate and necessary to ensure that apprentices receive the proper training for their skilled apprenticeable occupations. Sponsors must be fully aware of, and agree to meet, these standards.
- Section 29.6 focuses on the quality and performance of a registered apprenticeship program including the completion rates of a program. This section provides that an apprenticeship program must have at least one registered apprentice in order to be designated and retain designation as a registered apprenticeship program.
- Section 29.7 specifies the content requirements (explicitly or by reference) for apprenticeship agreements between apprentices and program sponsors, including provisions pertaining to wages and training (on-the-job and related instruction), work processes, proper probationary periods, and equal employment opportunity.
- Section 29.13 provides for the recognition of SAAs by the Secretary for Federal purposes, and the transmittal of certain information by the SAA to OA for approval for recognition or continued recognition. This provision is consistent with the NAA, which calls for cooperation with SAAs engaged in the formulation and development of standards of apprenticeship. This section also provides that an SAA can relinquish its

authority to administer registered apprenticeship for Federal purposes, and that OA retains full authority to register apprenticeship programs and apprentices, for Federal purposes, in all states/territories.

- Section 29.14(g) provides that sponsors must notify all apprentices that SAA recognition for Federal purposes has been withdrawn.

Title 29 CFR part 30 (part 30) implements the NAA by requiring registered apprenticeship program sponsors to provide equal employment opportunity for participation in their registered apprenticeship programs, and by protecting apprentices and applicants for apprenticeship from discrimination. In addition, part 30 also requires that sponsors of registered apprenticeship programs undertake affirmative steps to ensure equal employment opportunity in such programs. Only those apprenticeship programs or agreements that are in conformity with the regulatory requirements contained in part 30 are eligible for OA or SAA registration. 29 CFR § 29.3(b)(2). On December 19, 2016, the Department amended part 30 to help employers reach a larger and more diverse pool of workers, including women, minorities, and individuals with disabilities. 81 FR 92026. These regulations can be accessed at:  
<https://www.govinfo.gov/content/pkg/FR-2016-12-19/pdf/2016-29910.pdf>.

The regulations at part 30 contain the following information collection requirements that are subject to the Paperwork Reduction Act:

- Section 30.3 provides that all apprenticeship program sponsors must document that their apprenticeship program conforms to EEO requirements in the regulations, or provide evidence that they conform to other similar EEO requirements. Section 30.3 sets forth the components of the general affirmative action duty, which include: (1) assigning responsibility to an individual to oversee EEO efforts; (2) internally disseminating the EEO policy, including publishing and posting an equal employment opportunity pledge and conducting orientation and information sessions for apprentices; (3) universal outreach and recruitment obligations, including developing and updating a list of recruitment sources and providing these sources with advance notice of apprenticeship openings, to ensure that recruitment extends to all persons without regard to race, sex, ethnicity, or disability; and (4) keeping the workplace free from harassment, intimidation, and retaliation, and providing procedures for handling and resolving complaints on these bases.
- Section 30.4 requires certain sponsors to develop and maintain an affirmative action program, setting forth that program in a written plan. Section 30.4 outlines the six required elements of an affirmative action program: (1) utilization analyses for race, sex, and ethnicity; (2) establishment of utilization goals for race, sex, and ethnicity, if necessary; (3) establishment of utilization analyses and goal setting for individuals with disabilities; (4) targeted outreach, recruitment, and retention, if necessary; (5) review of personnel processes; and (6) invitations to self-identify as an individual with a disability.

- Section 30.5 provides sponsors with a method for assessing whether possible barriers to apprenticeship exist for particular groups of individuals by determining whether the race, sex, and ethnicity for apprentices in a sponsor's apprenticeship program is reflective of persons available for apprenticeship by race, sex, and ethnicity in the relevant recruitment area.
- Section 30.6 provides that a sponsor is required to establish a utilization goal for a particular group in its apprenticeship program if its utilization of women, Hispanics or Latinos, or a particular racial minority group is significantly less than would be reasonably expected given the availability of such individuals for apprenticeship. The sponsor must establish a percentage goal at least equal to the availability of the pool of eligible applicants. Utilization goals serve as objectives or targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire affirmative action program work.
- Section 30.7 establishes a national utilization goal for employment of qualified individuals with disabilities as apprentices for each major occupation group within which a sponsor has an apprenticeship program.
- Section 30.8 provides that a sponsor must undertake targeted outreach, recruitment, and retention activities that are likely to generate an increase in applications for apprenticeship from and improve retention of apprentices from the targeted group or groups and/or from individuals with disabilities during those instances where a sponsor has found underutilization and established a utilization goal for a specific group or groups, and/or where a sponsor has determined that there are problem areas resulting in impediments to equal employment opportunity.
- Section 30.9 provides that any sponsor who is subject to the affirmative action requirements under part 30 (i.e., those with five or more apprentices who are not otherwise exempt) must review its personnel processes on at least an annual basis to ensure it is meeting its obligation. This review includes all aspects of an apprenticeship program, including qualifications for apprenticeship, wages, outreach and recruitment activities, advancement opportunities, promotions, work assignments, job performance, rotations among all work processes of the occupation, disciplinary actions, handling of requests for reasonable accommodations, the program's accessibility to individuals with disabilities (including accessibility of information and communication technology) and making all necessary modifications to ensure compliance with the equal opportunity obligations of this part.
- Section 30.10 provides that a sponsor's procedures for selection of apprentices must be included in the written plan for Standards of Apprenticeship submitted to and approved by the Registration Agency. Each sponsor must collect such data and maintain such records as the Registration Agency finds necessary to determine whether the sponsor has complied or is complying with the regulatory requirements. Such records must include, but are not limited to, records relating to: selection for apprenticeship, including

applications, tests and test results, interview notes, bases for selection or rejection, and any other records required to be maintained; information relative to the operation of the apprenticeship program; compliance with the requirements of the equal opportunity standards; and any other records pertinent to a determination of compliance with these regulations.

Sponsors are required to keep accurate records on the qualifications of each applicant pertaining to determination of compliance with part 30. Records must be retained, where appropriate, regarding affirmative action programs and evidence that qualification standards have been validated. All of the above records are required to be maintained for five years from the date of the making of the record or the personnel action involved, whichever occurs later.

- Section 30.11 provides that sponsors are required to invite applicants to voluntarily self-identify as part of the apprenticeship application process if they are an individual with a disability. Sponsors are required to extend this invitation to applicants and apprentices: (1) at the time the individual applies for or is considered for apprenticeship; and (2) after the individual is accepted into an apprenticeship program but before they begin their apprenticeship. Program sponsors are required to remind apprentices yearly that they may voluntarily update their disability status, thereby, allowing those who have subsequently become disabled or who did not wish to self-identify during the application and enrollment process to be counted.
- Section 30.12 provides that sponsors are required to keep accurate records on the qualifications of each applicant pertaining to a determination of compliance with these regulations. Records must be retained, where appropriate, regarding affirmative action plans and evidence that qualification standards have been validated. SAAs are also obligated to keep adequate records pertaining to a determination of compliance with these regulations. All of the above records are required to be maintained for a period of five years.
- Section 30.14 provides that sponsors must provide written notice to all applicants for apprenticeship and all apprentices of their right to file a discrimination complaint and the procedures for doing so. The notice must include the address, phone number, and other contact information for the Registration Agency that will receive and investigate complaints filed under part 30. The notice must be provided in the application for apprenticeship and must also be displayed in a prominent, publicly available location where all apprentices will see the notice.
- Section 30.18 provides that all apprenticeship programs registered with SAAs for Federal purposes must comply with the requirements of the State's EEO plan within 180 days from the date that the Department provides written approval of the State EEO plan.

A recognized SAA must submit a State EEO plan incorporating the requirements of part 30 and keep all records pertaining to program compliance reviews, complaint

- investigations, and any other records pertinent to a determination of compliance. These records must be maintained for five years from the date of their creation.
- Section 30.19 provides that SAAs must request approval from the Department for exemptions granted to these regulations affecting a substantial number of employers.

The chief intent of this ICR is to:

1. Streamline and modernize ETA Form 671 (Program Registration and Apprenticeship Agreement) in an effort to eliminate irrelevant fields; to capture required information about registered apprenticeship programs in connection with certain provisions of the Support for Veterans in Effective Apprenticeships Act of 2019 (Public Law 116-134), the Veterans Apprenticeship and Labor Opportunity Reform (VALOR) Act (Public Law 115-89), and the Workforce Innovation and Opportunity Act (Public Law 113-128); to capture critical information that will inform the content of a sponsor's apprenticeship program standards; and to align the overall content of the apprenticeship agreement with the various regulatory requirements specified in 29 CFR § 29.7.
2. Add the information collection requirements contained in part 30 that are currently approved under OMB Control No. 1205-0224 (including ETA Form 9039 (Complaint Form – Equal Employment Opportunity in Apprenticeship Programs)) to this ICR in an effort to consolidate all information collection requirements pertaining to the registration of apprenticeship programs and apprentices into a single ICR.
3. Obtain OMB approval on a new information collection instrument pertaining to state program and apprentice registration (ETA Form 9186) so that the Department can conduct such collection of information.

**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.**

#### ETA Form 671

The information collected on the “Program Registration, Section I,” and “Apprentice Agreement and Registration, Section II,” of ETA Form 671 is in accordance with part 29, subpart A.

For program registration, the sponsor will enter the information electronically (or manually) on pages one through six of ETA Form 671, Section I. On page six of ETA Form 671, Section I (Program Registration), the sponsor will provide a written assurance that it will comply with certain statutory requirements under Public Law 116-134 concerning Title 38 educational assistance for veterans or other eligible individuals. Pages seven and eight of ETA Form 671, Section I, consist of definitions and/or instructions to assist the sponsor in completing the instrument. An Apprentice and Training Representative (ATR), a Federal employee who works for OA, provides assistance to the apprenticeship program sponsor in completing ETA Form 671, Section I, and then reviews this information for compliance before approving it for entry

into OA's registered apprenticeship database, titled "Registered Apprenticeship Partners Information Data System (RAPIDS)." An ATR also assists apprenticeship program sponsors in the development of training plans, standards, and programs, which will have application throughout the industry or a particular section of industry that is of interest. The ATR periodically reviews the information collected by ETA Form 671 for changes in any apprenticeship program information that was previously collected (e.g., active or inactive program and related instruction provider). This information needs to be collected to ensure that the apprenticeship program is in conformity with part 29, subpart A, for continuity of registration, and to safeguard the welfare of the apprentice.

For apprentice registration, the sponsor will enter the information electronically (or manually) in Part A on page one of ETA Form 671, Section II (Apprentice Agreement and Registration). The information in Part B of ETA Form 671, Section II (see pages one through two), with the exception of fields 6, 6a, 7, 8, and 8a, will be repopulated electronically from ETA Form 671, Section I (Program Registration), through RAPIDS. The parties to the apprenticeship agreement will need to provide their signatures in Part C of ETA Form 671, Section II (see page three), and the Registration Agency will complete Part D of ETA Form 671, Section II (see page three). Pages four and five of ETA Form 671, Section II, consist of definitions and/or instructions to facilitate the completion of this instrument.

A separate tear-off sheet for ETA Form 671, Section II (Apprentice Agreement and Registration), titled "Voluntary Disability Disclosure," was developed to address the part 30 requirement that sponsors who are required to maintain Affirmative Action Programs must invite applicants for apprenticeship and apprentices to voluntarily self-identify as an individual with a disability. The invitation may be included with the application materials, but must be separable or detachable from the application for apprenticeship or ETA Form 671, Section II and treated as confidential. This self-identification must be provided to the Registration Agency upon request, and the information may only be used in accordance with the regulations.

The ATR reviews the foregoing information for compliance before approving it for entry into RAPIDS. The ATR periodically reviews the information to ensure that the apprentice is receiving the appropriate training and to document all aspects of training agreed upon by the individual apprentice and the sponsor. If this information is not collected, there can be no formal agreement or registration between the sponsor and the apprentice and, therefore, no formal apprenticeship program.

Title 29 CFR § 29.5 requires sponsors to conform to certain apprenticeship standards to be eligible for registration as an apprenticeship program. The program standards must include the key components collected in ETA Form 671 (e.g., the sponsor's program delivery approach, an outline of the work processes, and a related instruction outline) and, among other things, also address the sponsor's compliance with part 30. Because the standards outline the conditions for the recruitment, selection, employment, and training of apprentices agreed to in the Apprenticeship Agreement, the standards are incorporated by reference into ETA Form 671, Section II (Apprentice Agreement and Registration).

The information collected by ETA Form 671 is summarized in RAPIDS, and is used to respond to inquiries from Congress, public interest groups, advocacy organizations, apprenticeship program stakeholders, and the general public for aggregated, non-individualized data on registered apprenticeship programs.

### ETA Form 9186

The information collected on ETA Form 9186 (State Apprenticeship Agency (SAA) Self-Assessment Report for Program Data and Apprentice Demographics) is in accordance with part 29, subpart A and part 30. There are 10 SAA states/territories that currently do not use RAPIDS as their case management system to administer Registered Apprenticeship in their respective state/territory. Accordingly, each of these 10 SAA states/territories must complete and provide OA with this document after the end of each quarterly reporting period. The information derived from this collection is used to ascertain key data, and calculate national registered apprenticeship program and apprentice totals.

### SAA Requirements

In accordance with 29 CFR § 29.13, SAA states/territories must provide OA with certain information to ensure the policy and procedures of each SAA state/territory conform to the minimum standards established by the Department's apprenticeship regulations. The information is reviewed and analyzed to determine whether the state/territory should be recognized as an SAA or maintain recognition as an SAA for Federal purposes. The notification to all apprentices that SAA recognition for Federal purposes has been withdrawn under 29 CFR § 29.14(g) serves to safeguard and protect the apprentices' welfare. Such notification is important so that apprentices understand that all benefits afforded to them under Federal recognition will no longer exist.

### Part 30 Requirements and ETA Form 9039

The Registration Agency reviews the information collected pursuant to part 30 at each compliance review, in response to a complaint, or when circumstances so warrant. This information is necessary to determine if the sponsor is complying with all equal opportunity requirements. The ETA Form 9039 allows applicants and apprentices to file complaints of discrimination on the basis of race, color, religion, national origin, sex (including pregnancy and gender identity), disability, age (40 or older), genetic information, sexual orientation, or retaliation with the Registration Agency.

**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.**

The Department has implemented an electronic apprentice registration process consistent with the Government Paperwork Elimination Act and E-Government Act requirements. The Department also has implemented an electronic program registration process through its case management system, RAPIDS. These tools are used to assist sponsors and apprentices in the registration process and improve data reporting capabilities.

The Department has given due consideration to the use of improved information technology to reduce burden. The Department has implemented a technical assistance tool (i.e., Standards Builder) to streamline the registration process. Sponsors may use Standards Builder to ensure that their programs adhere to the standards specified in 29 CFR § 29.5.

Part 30 includes several recordkeeping requirements to facilitate the monitoring of apprenticeship program sponsors' compliance with their equal employment opportunity obligations. The use of information technology for storage and retrieval of such records for the EEO complaint procedures is at the respondent's discretion. The EEO complaint procedures as well as the electronic EEO complaint form (ETA Form 9039) are available on the Department's website at: <https://www.apprenticeship.gov/eo/apprentices-and-applicants/complaints>.

To reduce burden, the Department has implemented a Universal Outreach tool that sponsors may use to assist them in meeting their universal outreach requirements under 29 CFR § 30.3(b)(3). This tool is available on the Department's website at: <https://www.apprenticeship.gov/eo/sponsors/recruit-and-hire>. In addition, the Department is in the process of deploying an EEO tool (i.e., an Affirmative Action Plan Builder) in RAPIDS that will permit sponsors to easily develop and maintain an affirmative action plan electronically. The Department anticipates implementing this tool during Fiscal Year 2021.

The ATR is available upon request to provide technical assistance and services to those sponsors and/or apprentices who do not have computer technology available to download or utilize the foregoing forms and compliance tools.

**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.**

Recordkeeping and reporting requirements under part 29, subpart A and part 30 are not duplicated elsewhere. However, the part 30 sections that contain information collection requirements subject to the Paperwork Reduction Act that are currently approved under OMB Control No. 1205-0224 have been added to this ICR. Once OMB approval is granted on this ICR, the Department will submit a request to discontinue the ICR approved under OMB Control No. 1205-0224 to avoid duplication.

Part 30 requires the utilization of the procedures outlined in part 29, subpart A for SAA deregistration, rather than maintaining separate deregistration procedures under part 30. Part 30 also incorporates an exemption from the Affirmative Action Program requirements, including the requirement to invite applicants and apprentices to self-identify as an individual with a disability,

for those sponsors who are already in compliance with an equal employment opportunity program approved as meeting other specified EEO laws. Therefore, sponsors who are already required to maintain self-identification data pursuant to another approved program would not be required to maintain duplicative information.

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

The information collected has minimal impact on small businesses. Furthermore, part 30 exempts sponsors with fewer than five apprentices from the need to adopt an affirmative action program under 29 CFR § 30.4.

**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.**

The registration of apprenticeship programs and apprentices is necessary to carry out the requirements of the NAA and its implementing regulations at part 29, subpart A and part 30. The reporting and recordkeeping requirements are the minimum requirements needed to assure that apprenticeship program sponsors and SAAs are complying with the Department's apprenticeship regulations. Also, this collection is necessary to carry out the requirements of the VALOR Act (Public Law 115-89), which is intended to increase access for veterans to apprenticeship opportunities in multiple locations. Failure to collect the required information could impede the Department's efforts to ensure compliance with the aforementioned statutory and regulatory requirements.

With the exception of the requirement that sponsors invite applicants and apprentices to voluntarily self-identify as an individual with a disability, apprentice information is only submitted on a one-time basis and, therefore, the collection frequency cannot be further reduced. In addition, the collection of data from the SAAs, who do not use RAPIDS as their case management system, on a quarterly basis is necessary to adequately determine a national data set on apprenticeship programs and apprentices and also, to accurately report these outcomes to the Administration, Congress, and other stakeholders. Because the Department needs to ensure the reliability of its data as well as properly assess the growth in apprenticeship, the collection frequency cannot be further reduced.

**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.**

The information is collected and retained in a manner consistent with the Paperwork Reduction Act. However, a records retention requirement of five years is necessary (and described in further detail in 29 CFR § 30.12(d)). Because the duration of many apprenticeship programs is four years or more, it is important for a Registration Agency to keep the records for a period of time after an apprentice has exited the program.

**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.**

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to comment on the *Federal Register* Notice, which published on January 13, 2021 (86 FR 2700). The comment period ended on March 15, 2021.

The Department received one public comment in response to the notice. After a careful analysis of the comment, the Department has determined that the comment is not germane to the notice as it only raises concerns about a specific apprenticeship program experience, and does not include any recommendations or feedback on the information collections proposed under this ICR nor does it adhere to the scope of comments requested in the notice. Accordingly, the Department will not respond to this comment in connection with this ICR.

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

This information collection does not involve payments or gifts to respondents.

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

The Privacy Act Statement is provided in ETA Form 671, Section II (Apprentice Agreement and Registration).<sup>1</sup> The information collected is used for apprenticeship program statistical purposes and is maintained, pursuant to the Privacy Act of 1974 (5 U.S.C. 552a), in a systems of records entitled, DOL/ETA-31, The Enterprise Business Support System (EBSS) (encompassing RAPIDS), at the U.S. Department of Labor, Office of Apprenticeship. This section provides for voluntary disclosure of the Social Security number (SSN). Providing the SSN facilitates accurate, consistent, and uniform retention and wage data from the Unemployment Insurance wage records through the State Wage Interchange System. This information is used for program management purposes, such as verification of the apprentice's period of employment and earnings to align with the Department's job training and employment program performance indicators for measuring performance outcomes. Also, included is a statement that informs the apprentice where the information provided on the collection instrument is stored, the name and location of the system, and the disclosure that the information is protected in accordance with the Privacy Act.

To minimize privacy concerns and the possibility of misuse of disability-related information, the Department requires that the invitation ask only for voluntary self-identification as to the existence of a "disability," and does not require disclosure by the respondent of the specific nature or type of disability the individual has, or of the nature or severity of any limitations the individual has as a result of their disability. Under part 30, any information obtained pursuant to part 30 regarding the medical condition or history of an applicant or apprentice must be collected

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<sup>1</sup> Privacy Act of 1974; Publication in Full of All Notices of Systems of Records, Including Several New Systems, Substantive Amendments to Existing Systems, Decommissioning of Obsolete Legacy Systems, and Publication of Proposed Routines Uses. 81 FR 25765 (See <https://www.federalregister.gov/documents/2016/04/29/2016-09510/privacy-act-of-1974-publication-in-full-of-all-notices-of-systems-of-records-including-several-new>).

and maintained on separate forms and in separate medical files and treated as a confidential medical record, except that: (1) Supervisors and managers may be informed regarding necessary restrictions on the work or duties of the applicant or apprentice and necessary accommodations; (2) First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and (3) Government officials engaged in enforcing part 30, the laws administered by Office of Federal Contract Compliance Programs, or the Americans with Disabilities Act, must be provided relevant information upon request. Information obtained under part 30, regarding the medical condition or history of any applicant or apprentice may not be used for any purpose inconsistent with this ICR.

There is no confidential information collected from States or apprenticeship program sponsors. Any disclosure of protected medical and genetic information in ETA Form 9039 will be subject to the confidentiality provisions of the Rehabilitation Act and Genetic Information Nondiscrimination Act (GINA); will exempt medical and genetic records, reports, or information from disclosure, where possible; or will redact protected medical and/or genetic information from records prior to disclosure.

**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.**

Sponsors are required to invite each applicant or apprentice to voluntarily identify as an individual with a disability as part of their Affirmative Action Program. Any information regarding the medical condition or history of an applicant or apprentice must be collected and maintained on separate forms and in separate medical files and treated as a confidential medical record.

This data is necessary to enable the Department to assess apprenticeship programs' compliance with the requirements of 29 CFR Part 30 and ensure that programs are affording equal employment opportunity to individuals with disabilities. This information will also enable programs to assess their utilization of qualified individuals with disabilities and their outreach efforts and recruitment of such individuals with disabilities. The form clearly states that the submission of the requested information is voluntary, and that the data is collected and maintained strictly for affirmative action purposes and will otherwise be kept confidential.

**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.**

#### Description of the information collection instrument, ETA Form 671

This form has two sections: Section I (Program Registration) is for the sponsor's information and Section II (Apprentice Agreement and Registration) is for the apprentice's information. These two separate sections are used at different times, for different purposes, and with different individuals or entities. The information is not duplicative. The information in Part B of ETA Form 671, Section II, with the exception of fields 6, 6a, 7, 8, and 8a, will be repopulated electronically from ETA Form 671, Section I (Program Registration), through RAPIDS. A tear-off sheet was added to the form that addresses the sponsor's invitation to the applicant and apprentice to voluntarily self-identify as an individual with a disability. Apprentice information is only submitted on a one-time basis, except when sponsors invite applicants and apprentices to voluntarily self-identify as an individual with a disability.

The ATR is available on request to provide technical assistance and services to those sponsors and apprentices who do not have computer technology available.

#### ETA Form 671, Section I, Program Registration

ETA Form 671, Section I (Program Registration) is composed of seven subsections (see pages one through six) and a definitions/instructions subsection for reference (see pages seven and eight). The seven subsections are: (1) Subsection A – Program Sponsor's Identifying Information; (2) Subsection B – Program Sponsor's Point of Contact and Other Relevant Information; (3) Subsection C – Additional Program Classification Information (Including Sponsor's Point of Contact for Complaints); (4) Subsection D – Occupation Information, Relevant Wage Information, and Minimum Qualification Requirements; (5) Subsection E – Related Instruction (RI) Provider(s) Information; (6) Subsection F – Selection Procedures; and (7) Subsection G – Program Sponsor's Written Assurances with Respect to Veterans' Educational Assistance as Mandated by Public Law 116-134 (134 Stat. 276).

Most of the information collected in Subsections A, B, and G is routine (e.g., the sponsor's identifying information, addresses, telephone numbers, e-mail addresses, and the point of contact's information, and signature of program sponsor official), while the information collected in Subsections C, D, E, and F is largely non-routine. The information in Section I is collected intermittently, but not more than once a year.

Section I has been adjusted since the most recent OMB approval to this collection. Most of the adjustments to this Section have been made to enhance clarity and to streamline fields that are no longer relevant or in use. The substantive changes to this Section include the addition of a subsection where a sponsor must attest to the assurances required under section 2(b)(1) of Public Law 116-134 with respect to Title 38 educational assistance; the addition of a field where a sponsor must disclose the principal place of business (i.e., the location of the sponsor's headquarters) in connection with section 2(b)(3) of Public Law 116-134 and section 2(c)(1) of Public Law 115-89; the addition of a field where a sponsor must indicate its willingness to be placed on the Eligible Training Provider List in connection with section 122 of Public Law 113-128; and the addition of multiple fields (e.g., ratio of apprentices to journeyworkers, on-the-job learning/training plan, and minimum program requirements) and a subsection (i.e., selection procedures) where a sponsor must disclose critical information that will inform the content of its apprenticeship program standards. The estimated average response time is 45 minutes per response to reflect the time necessary for a sponsor to gather information to complete this section.

#### ETA Form 671, Section II, Apprentice Agreement and Registration

ETA Form 671, Section II (Apprentice Agreement and Registration) is composed of four parts (see pages one through three) and a definitions/instructions subsection for reference (see pages four and five). The four parts are: (1) Part A – Apprentice's Information; (2) Part B – Program Sponsor's Information; (3) Part C – Agreement and Signatures; and (4) Part D – To be Completed by Registration Agency.

Section II has been adjusted since the most recent OMB approval to this collection. Most of the adjustments to this Section have been made to align the content of the apprenticeship agreement with the various regulatory requirements contained in 29 CFR § 29.7, enhance clarity, and streamline fields that are no longer relevant or in use. In addition, the veteran status category has been modified in connection with Public Law 116-134 to enable registered apprenticeship programs to better service veterans; the sex, ethnicity, race, and veteran status categories have been updated to include an additional field for apprentices who elect not to disclose this information; and the education level category has been slightly adjusted to align the educational attainment categories for which the U.S. Government compiles workforce data by race, national origin, and sex. The revisions to this Section will not add any new or additional time or cost burden to complete this form.

#### Tear-off Sheet, Voluntary Disability Disclosure

The tear-off sheet (Voluntary Disability Disclosure) is a vehicle used by sponsors to invite an applicant and apprentice to voluntarily self-identify as an individual with a disability. The tear-off sheet has been adjusted since the most recent OMB approval to this collection. The adjustment includes an update to the Department's website in the footnote. The revision to this tear-off sheet will not add any new or additional time or cost burden to complete this form.

The estimated average response time is five minutes per response.

### Sections 29.3 and 29.6

In Fiscal Year (FY) 2019, the Department's Registered Apprenticeship data indicated that there were approximately 24,778 registered apprenticeship programs in the national apprenticeship system. Based on this fiscal year data, 994 new programs were registered with OA, while 2139 new programs were registered with an SAA for a total of 3,133 new programs. The estimated average response time for new program registrations with OA is 45 minutes for ETA Form 671, Section I (Program Registration). The total annual burden is 746 burden hours (994 x .75). The information collected in ETA Form 671, Section I (Program Registration) is reviewed periodically but not more than once on a yearly basis. The annual respondent cost is \$28,109 (746 hours x \$37.68\*).

The estimated average response time for new program registrations with an SAA is 45 minutes for ETA Form 671, Section I (Program Registration). The total annual burden is 1,604 burden hours (2,139 x .75). The information collected in ETA Form 671, Section I (Program Registration) is reviewed periodically but not more than once on a yearly basis. The annual respondent cost is \$60,439 (1,604 hours x \$37.68\*).

\* According to the Department's Bureau of Labor Statistics (BLS), the estimated mean hourly wage for an Administrative Assistant (43-6014) in the private sector in May 2019 was \$18.84 (source: <http://www.bls.gov/oes/current/oes436014.htm>). Based on data from BLS's "Employer Costs for Employee Compensation" release (<https://www.bls.gov/ect>), the percentage of an employee's total compensation package that consisted of employee benefits averaged 46% over the past year. In addition, total related overhead costs are estimated to comprise an additional 54% of the applicable base wage (source: Guidelines for Regulatory Impact Analysis, 2016, published by the U.S. Department of Health and Human Services, at the following website: [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf)). Accordingly, the total hourly compensation rate for an Administrative Assistant (adjusted to include employee benefits and overhead costs) is estimated to be \$37.68 (= \$18.84 hourly base wage + \$8.67 in employee benefits + \$10.17 in overhead costs).

Experience has shown that each sponsor responds at least once a year with information on new apprentices and completions. According to the Department's Registered Apprenticeship data, approximately 252,271 new apprentices were registered and about 81,552 completions were recorded nationwide. In FY 2019, 176,117 new apprentices were registered with OA, while 76,154 new apprentices were registered with an SAA. In FY 2019, 53,042 apprentice completions occurred under programs registered with OA, while 28,510 apprentice completions

occurred under programs registered with an SAA. The estimated average response time is 5 minutes for new apprentice registrations and completions occurring with OA, resulting in: 14,618 hours (176,117 x 0.083 hours), and 4,402 hours (53,042 x 0.083 hours), respectively. The annual respondent cost is \$550,806 (14,618 hours x \$37.68\*) and \$165,867 (4,402 hours x \$37.68\*), respectively.

The estimated average response time is 5 minutes for new apprentice registrations and completions occurring with an SAA, resulting in: 6,321 hours (76,154 x 0.083 hours), and 2,366 hours (28,510 x 0.083 hours), respectively. The annual respondent cost is \$238,175 (6,321 hours x \$37.68\*) and \$89,151 (2,366 hours x \$37.68\*), respectively.

### Section 29.5

Pursuant to 29 CFR § 29.5, an apprenticeship program's eligibility for approval and registration by a Registration Agency is contingent on the program having an organized, written plan (program standards) embodying the terms and conditions of employment, training, and supervision of one or more apprentices in an apprenticeable occupation, and subscribed to by a sponsor who has undertaken to carry out the apprentice training program.

There are approximately 1,200 occupations that are recognized as apprenticeable. Each of these occupations (and apprenticeship approaches) has a set of program standards. Once the program standards are developed for a particular occupation, program sponsors may reuse these standards with minor modifications, or adapt them to suit their own requirements, if necessary. The program standards for a sponsor are developed on a one-time basis and are modified periodically based upon changing requirements (e.g., updates to the collective bargaining agreement, major technological changes that require adjustments to the work processes, or changes in industry practices and related training).

As noted above in 29 CFR §§ 29.3 and 29.6, a total of 3,133 new apprenticeship programs were registered in FY 2019. The estimated average response time for developing program standards electronically (or manually) is 20 minutes. The total annual burden is 1,034 burden hours (3,133 x 0.33). The annual respondent cost is \$38,961 (1,034 hours x \$37.68\*).

OA and SAA staff are responsible for reviewing and providing input on a sponsor's apprenticeship program standards to ensure compliance with the requirements in part 29, subpart A and part 30. Accordingly, SAA staff perform similar functions as the Federal ATRs of OA, following a process that meets the minimum requirements contained in 29 CFR § 29.5. Approximately, 2,139 programs were registered by SAAs in FY 2019. Experience indicates that the review/input provided by SAA staff (and Federal ATRs of OA) to a sponsor takes 1.5 hours, which results in 3,209 annual burden hours (2,139 x 1.5 hours). With State employees hourly wage of \$64.76\*\*, the annualized cost to the SAA is \$207,815 (3,209 hours x \$64.76\*\*).

\*\* According to the Department's Bureau of Labor Statistics (BLS), the estimated mean hourly wage for a State Government Management/Program Analyst (13-1111) in May 2019 was \$32.38 (source: <http://www.bls.gov/oes/current/999201.htm>). Based on data from BLS's "Employer

Costs for Employee Compensation” release (<https://www.bls.gov/ect>), the percentage of an employee’s total compensation package that consisted of employee benefits averaged 46% over the past year. In addition, total related overhead costs are estimated to comprise an additional 54% of the applicable base wage (source: Guidelines for Regulatory Impact Analysis, 2016, published by the U.S. Department of Health and Human Services, at the following website: [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf)). Accordingly, the total hourly compensation rate for a State Government Management/Program Analyst (adjusted to include employee benefits and overhead costs) is estimated to be \$64.76 (= \$32.38 hourly base wage + \$14.89 in employee benefits + \$17.49 in overhead costs).

#### Description of the information collection instrument, ETA Form 9186

ETA Form 9186 (State Apprenticeship Agency (SAA) Self-Assessment Report for Program Data and Apprentice Demographics) is a report that will be utilized by OA to collect key data from SAAs that currently do not use RAPIDS as their case management system to administer Registered Apprenticeship in their state. This report is being added as a new information collection instrument in this ICR. This report is composed of two main sections (see pages one through three) and a definitions/instructions section for reference (see pages four through seven). The two main sections are: (1) Program Data and (2) Active Apprentice Demographics.

In FY 2019, the Department’s Registered Apprenticeship data indicated that there are 10 SAAs that do not use RAPIDS. The estimated average response time by SAAs to provide program and apprentice demographic data is 60 minutes for ETA Form 9186 (State Apprenticeship Agency (SAA) Self-Assessment Report for Program Data and Apprentice Demographics) on a quarterly basis. The total annual burden is 40 burden hours (40 x 1 hour). (Note: 40 represents the total number of responses – 10 SAAs x 4 quarters per fiscal year.) The information collected in ETA Form 9186 is reviewed periodically and collected four times a year. The annual respondent cost is \$2,590 (40 hours x \$64.76\*\*).

#### Section 29.13

All 29 SAAs have been recognized (or have continued recognition status) as SAAs for Federal purposes. States seeking new or continued recognition must submit information, which include the state apprenticeship law; the establishment and continued use of a State Apprenticeship Council, including its composition and representation; the State Plan for Equal Employment Opportunity that conforms to the requirements published in part 30; the submission and description of the basic standards, criteria, and requirements for program registration and/or approval; and a description of policies and operating procedures.

To submit information to OA for recognition purposes, the state reviews instructions, searches existing data sources, gathers and maintains the data needed, and completes and reviews the collection of information required. The average annual burden for all 29 SAAs is 58 hours (29 SAAs x 2 hours per response) and the estimated cost is \$3,756 (29 SAAs x 2 hours x \$64.76\*\*). This cost is limited to the submission of the information and assumes that the state, in its own

desire to have an apprenticeship agency, has already taken all the necessary actions and prepared all the required documents for the operation of its own apprenticeship program.

#### Section 29.14

No SAA has been derecognized since 2012. In 29 CFR § 29.14(g) of the regulations, the SAA is required to notify registered apprentices of the withdrawal of recognition for Federal purposes. A placeholder of one burden hour is included in the table below.

#### Voluntary Disability Disclosure

The Department's ETA Form 671 – Section II, Apprentice Agreement and Registration, provides for the collection of information, on a voluntary basis, of an applicant or apprentice's disability status. Such information is to be collected on a separate tear-off sheet that will be maintained separately from the apprentice agreement and registration, and treated as confidential.

Part 30 requires sponsors to invite applicants for apprenticeship to voluntarily self-identify as an individual with a disability. The invitation may be included with the application materials but must be separable or detachable from the application for apprenticeship or ETA Form 671 – Section II (Apprentice Agreement and Registration), and treated as confidential. Sponsors are required to extend this invitation to applicants and apprentices: (1) at the time the individual applies for or is considered for apprenticeship; and (2) after the individual is accepted into an apprenticeship program but before they begin their apprenticeship. Thereafter, sponsors would be required to remind apprentices yearly that they may voluntarily update their disability status, thereby, allowing those who have subsequently become disabled or who did not wish to self-identify during the application and enrollment period to be counted.

The invitation process to disclose a disability is estimated to take 5 minutes per participant, and an estimated 30 minutes for a sponsor to record and maintain the forms annually for an estimated total of 35 minutes. The estimated number of new apprentices is 252,271 per year (176,117 new apprentices were registered with OA, while 76,154 new apprentices were registered with an SAA) with an estimated total burden of 146,317 hours per year. Specifically, the burden to collect, record, and maintain the voluntary disability disclosure is estimated to be 102,148 hours per year (176,117 x 0.58 hours) and a cost of \$3,848,937 (102,148 hours x \$37.68\*) for new apprentices registered with OA. The burden to collect, record, and maintain the voluntary disability disclosure is estimated to be 44,169 hours per year (76,154 x 0.58 hours) and a cost of \$1,664,288 (44,169 hours x \$37.68\*) for new apprentices registered with an SAA.

#### Recordkeeping Requirement

Sponsors are required to keep accurate records on the qualifications of each applicant and apprentice as required by the Registration Agency, while SAAs are required to keep accurate records on each apprenticeship program's standards. As noted above, these records are required to be maintained for a period of five years.

Sponsor Annual Burden: 63,068 hours

Sponsors should maintain accurate records on each applicant and apprentice in an apprenticeship program. This includes maintaining records relating to an apprentice's performance and progress on the job and in related instruction. Compliance with this recordkeeping requirement is estimated at 15 minutes per program sponsor. In the currently approved ICR under OMB Control No. 1205-0223, the Department estimated that the recordkeeping requirement would average 1 minute per response. This one minute estimate constitutes an inadvertent administrative error, and has been corrected in this revised ICR for transparency purposes and to reflect a more precise estimate of this requirement.

The annual burden is equal to 44,029 hours (176,117 x 0.25 hours) for apprentices registered with OA, and 19,039 hours (76,154 x 0.25 hours) for apprentices registered with an SAA for a total of 63,068 hours. The estimated cost is equal to \$1,659,013 (44,029 hours x \$37.68\*) and \$717,390 (19,039 hours x \$37.68\*), respectively.

SAA Annual Burden: 535 hours

SAs should maintain accurate records on each apprenticeship program's standards. This includes maintaining records relating to information relative to the operation of the apprenticeship program. Compliance with this recordkeeping requirement is estimated at 15 minutes per SAA.

The annual burden is equal to 535 hours (2,139 x 0.25 hours), and the estimated cost is equal to \$34,647 (535 hours x \$64.76\*\*).

### Part 30 Requirements

The part 30 information collection requirements are estimated to require an annual burden of 236,414 hours.

Of the 24,778 active programs registered nationwide (29 SAAs + 25 OA states) in FY 2019, approximately 5,907 of these programs have five or more apprentices registered nationwide according to the Department's Registered Apprenticeship data. Disaggregating this data further, there were approximately 6,961 active programs with fewer than five apprentices, and approximately 2,849 active programs with five or more apprentices that were registered in the 25 federally administered OA states.

### Section 30.3

Annual Burden: 49,556 hours

It is unlawful for a sponsor of a registered apprenticeship program to discriminate against an apprentice or applicant for apprenticeship on the basis of race, color, religion, national origin, sex (including pregnancy and gender identity), age (40 or older), disability, genetic information, or sexual orientation. All apprenticeship sponsors must document that their apprenticeship program

conforms to the EEO requirements contained in part 30 or provide evidence that they conform to other similar EEO requirements. Furthermore, all sponsors are required to post the equal opportunity pledge in the workplace.

The compliance with the equal employment opportunity standards required by section 30.3 is estimated at 2 hours per sponsor. This estimate accounts for universal outreach to a variety of recruitment sources, including organizations that serve individuals with disabilities, and the time it takes to post the equal opportunity pledge. This estimate includes:

- 15 minutes to post the pledge on sponsors' premises and websites
- 45-minute regular orientation, information session, and anti-harassment training annually (including additional time for new sponsors to develop the training)
- 30 minutes of a human resource manager's time per targeted recruitment
- 30 minutes of an administrative assistant's time per targeted recruitment

The annual burden is equal to 49,556 hours (24,778 active program sponsors x 2 hours), and the estimated cost is equal to \$1,867,270 (49,556 hours x \$37.68\*).

#### Sections 30.4 – 30.9

Annual Burden: 159,489 hours

All sponsors that employ five or more apprentices (and that are not otherwise exempt) are required to establish an affirmative action program that is designed to ensure equal employment opportunity and prevent discrimination in their apprenticeship program. Such a program requires the sponsor to take affirmative steps to encourage and promote equal opportunity, to create an environment free from discrimination, and to address any barriers to equal opportunity in apprenticeship. It includes those policies, practices, and procedures, including self-analyses, that the sponsor implements to ensure that all qualified applicants and apprentices are receiving an equal opportunity for recruitment, selection, advancement, retention and every other term and privilege associated with apprenticeship.

The purpose of the utilization analysis is to provide sponsors with a method for assessing whether possible barriers to apprenticeship exist for particular groups of individuals by determining whether the race, sex, and ethnicity for apprentices in a sponsor's apprenticeship program is reflective of persons available for apprenticeship by race, sex, and ethnicity in the relevant recruitment area.

Sponsors are required to establish a utilization goal for a particular group in its apprenticeship program if its utilization of women, Hispanics or Latinos, or a particular racial minority group is significantly less than would be reasonably expected given the availability of such individuals for apprenticeship. The sponsor must establish a percentage goal at least equal to the availability of the pool of eligible applicants. Utilization goals serve as objectives or targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire affirmative action program work.

Where a sponsor has found underutilization and established a utilization goal for a specific group or groups, and/or where a sponsor has determined that there are problem areas resulting in impediments to equal employment opportunity, the sponsor must undertake targeted outreach, recruitment, and retention activities that are likely to generate an increase in applications for apprenticeship from and improve retention of apprentices from the targeted group or groups and/or from individuals with disabilities, as appropriate.

As part of its affirmative action program, the sponsor must, for each registered apprenticeship program, engage in review of its personnel processes related to the administration of the apprenticeship program to ensure that the sponsor is operating an apprenticeship program free from discrimination based on race, color, religion, national origin, sex (including pregnancy and gender identity), age (40 or older), disability, genetic information, and sexual orientation.

The compliance with the affirmative action requirements for sponsors that employ five or more apprentices is estimated at 27 hours per sponsor. The burden hour estimate for these affirmative action obligations is broken down as follows:

- (1) Six hours to develop, maintain, and update a written affirmative action plan within two years from time of registration.
- (2) 0.5 hours for utilization analysis for race, sex, and ethnicity in 29 CFR § 30.5.
- (3) 0.5 hours for establishment of utilization goals for race, sex, and ethnicity in 29 CFR § 30.6.
- (4) One hour for utilization goals for individuals with disabilities in 29 CFR § 30.7.
- (5) Five hours for outreach, recruitment, and retention for targeted groups in 29 CFR § 30.8.
- (6) Eight hours for review of personnel processes and an additional six hours to complete an update to the written affirmative action plan that captures the results of the personnel processes review in 29 CFR § 30.9.

The annual burden is equal to 159,489 hours (5,907 active program sponsors with five or more apprentices x 27 hours), and the estimated cost is equal to \$6,009,546 (159,489 hours x 37.68\*).

**Note:** As noted above, the Department intends to implement an electronic Affirmative Action Plan Builder tool to facilitate in the sponsor's development and maintenance of an affirmative action plan. Once implemented and available to sponsors for use, the Department estimates that it will take 30 minutes to develop, maintain, and update an affirmative action plan within two years from time of registration. Accordingly, the utilization of this tool will reduce the burden on sponsors for these affirmative action obligations from 27 hours to 21.5 hours.

#### Sections 30.10 and 30.12 Recordkeeping of Active Apprentices

Annual Burden: 49,556 hours

Sponsors are required to keep accurate records on the qualifications of each applicant pertaining to determination of compliance with part 30. Records must be retained, where appropriate,

regarding affirmative action programs and evidence that qualification standards have been validated. All of the above records are required to be maintained for five years.

A sponsor's procedures for selection of apprentices must be included in the written plan for Standards of Apprenticeship submitted to and approved by the Registration Agency. Each sponsor must collect such data and maintain such records as the Registration Agency finds necessary to determine whether the sponsor has complied or is complying with the regulatory requirements.

The compliance with the recordkeeping requirements is estimated at 2 hours per sponsor for the actual filing of the information. This includes maintaining records relating to:

- Selection for apprenticeship, including applications, tests and test results, interview notes, bases for selection or rejection, and any other records required to be maintained;
- Information relative to the operation of the apprenticeship program;
- Compliance with the requirements of the equal opportunity standards; and
- Any other records pertinent to a determination of compliance with these regulations.

The annual burden is equal to 49,556 hours (24,778 active program sponsors x 2 hours), and the estimated cost is equal to \$1,867,270 (49,556 hours x 37.68\*).

#### Section 30.14

Annual Burden: 5 hours

Sponsors must provide written notice to all applicants for apprenticeship and all apprentices of their right to file a discrimination complaint and the procedures for doing so. The notice must include the address, phone number, and other contact information for the Registration Agency that will receive and investigate complaints. The burden on the sponsor is merely to provide written notice to all applicants and apprentices of complaint procedures. This consists of a one-time notification to each applicant. This notification can include providing a copy of the complaint form.

The part 30 EEO Complaint Procedures and the electronic Complaint Form — Equal Employment Opportunity in Apprenticeship Programs (ETA Form 9039) are available on the Department's website at:

<https://www.apprenticeship.gov/eo/apprentices-and-applicants/complaints>.

ETA Form 9039, is used to file a discrimination complaint. Currently, ETA Form 9039 is an information collection instrument in the ICR approved under OMB Control No. 1205-0224, and is being added to this ICR under OMB Control No. 1205-0223. Upon obtaining OMB approval on this ICR, the Department will submit a request to discontinue the ICR approved under OMB Control No. 1205-0224. ETA Form 9039 has been adjusted since the most recent OMB approval under OMB Control No. 1204-0224, and includes minor, nonsubstantive textual edits. The revisions to ETA Form 9039 will not add any new or additional time or cost burden to

individuals who voluntarily choose to file a complaint form regarding EEO in registered apprenticeship.

The burden for completion of ETA Form 9039 is estimated to be 30 minutes per applicant/apprentice. The 10 complaints estimate is based on historical data. Therefore, the annual burden is estimated to be 5 hours (10 applicants/apprentices x 0.5 hours), and the estimated cost is equal to \$188 (5 hours x 37.68\*).

Sections 30.18 and 30.19

Annual Burden: 19,039 hours

A recognized SAA must keep all records pertaining to program compliance reviews, complaint investigations, and any other records pertinent to a determination of compliance. These records must be maintained for 5 years from the date of their creation. In FY 2019, the 29 SAAs registered approximately 76,154 new apprentices, requiring about fifteen minutes per response. This equates to an estimated annual burden of 19,039 hours (0.25 hours x 76,154 new apprentices), and an estimated cost of \$1,232,966 (19,039 hours x 64.76\*\*).

The burden on SAAs to notify the Department of exemptions made to these regulations consists of merely advising the Department of what exemptions have been granted. The Department is not aware of any State exemptions that have been granted.

### Estimated Annualized Respondent Cost and Hour Burden

Table 1: Part 29, Subpart A Requirements (including ETA Form 671 and ETA Form 9186)

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
ETA Form 671, Section I, Program Registration - Sponsor							
ETA Form 671, Section I (Registered with OA) 29.3	994 <i>(Sponsor)</i>	1	994	.75	746	\$37.68	\$28,109
ETA Form 671, Section I (Registered with an SAA) 29.3	2,139 <i>(Sponsor)</i>	1	2,139	.75	1,604	\$37.68	\$60,439
<b>Unduplicated Total</b>	<b>3,133</b>	-	<b>3,133</b>	-	<b>2,350</b>	-	<b>\$88,548</b>
ETA Form 671, Section II, Program Registration - Apprentice							
ETA Form 671,	176,117	1	176,117	.083	14,618	\$37.68	\$550,806

Registration and Equal Employment Opportunity in Apprenticeship Programs

OMB Control Number 1205-0223

OMB Expiration Date: XX/XX/XXXX

Section II (Registered with OA) 29.3	<i>(Apprentice)</i>						
ETA Form 671, Section II (Registered with an SAA) 29.3	76,154 <i>(Apprentice)</i>	1	76,154	.083	6,321	\$37.68	\$238,175
<b>Unduplicated Total</b>	<b>252,271</b>	-	<b>252,271</b>	-	<b>20,939</b>	-	<b>\$788,981</b>
ETA Form 671, Section II, Apprenticeship Agreement and Registration							
ETA Form 671, Section II (Registered with OA) 29.6	53,042 <i>(Apprentice)</i>	1	53,042	.083	4,402	\$37.68	\$165,867
ETA Form 671, Section II (Registered with an SAA) 29.6	28,510 <i>(Apprentice)</i>	1	28,510	.083	2,366	\$37.68	\$89,151
<b>Unduplicated Total</b>	<b>81,552</b>	-	<b>81,552</b>	-	<b>6,768</b>	-	<b>\$255,018</b>
Standards of Apprenticeship							
Development of Standards 29.5	3,133 <i>(Sponsor)</i>	1	3,133	.33	1,034	\$37.68	\$38,961
Review/ Provide Input on Standards 29.5	29 (SAA)	73.76	2,139	1.5	3,209	\$64.76	\$207,815
<b>Unduplicated Total</b>	<b>3,162</b>	-	<b>5,272</b>	-	<b>4,243</b>	-	<b>\$246,776</b>
ETA Form 9186, SAA Self-Assessment Report for Program Data and Apprenticeship Demographics							
ETA Form 9186	10 (SAA)	4	40	1	40	\$64.76	\$2,590
<b>Unduplicated Total</b>	<b>10</b>	-	<b>40</b>	-	<b>40</b>	-	<b>\$2,590</b>
Recognition of State Apprenticeship Agencies							
ETA Form 671, Section II 29.13	29 (SAA)	1	29	2	58	\$64.76	\$3,756
ETA Form 671, Section II 29.14	1 (SAA)	1	1	1	1	\$64.76	\$64.76
<b>Unduplicated Total</b>	<b>30</b>	-	<b>30</b>	-	<b>59</b>	-	<b>\$3820.76</b>
Tear-off Sheet, Voluntary Disability Disclosure							

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ETA Form 671, Section II: Disability Disclosure (Registered with OA)	176,117 <i>(Apprentice)</i>	1	176,117	0.58	102,148	\$37.68	\$3,848,937
ETA Form 671, Section II: Disability Disclosure (Registered with an SAA)	76,154 <i>(Apprentice)</i>	1	76,154	0.58	44,169	\$37.68	\$1,664,288
<b>Unduplicated Total</b>	<b>252,271</b>	<b>-</b>	<b>252,271</b>	<b>-</b>	<b>146,317</b>	<b>-</b>	<b>\$5,513,225</b>
Sponsor Recordkeeping							
Recordkeeping (Registered with OA)	994 <i>(Sponsor)</i>	177.18	176,117	0.25	44,029	\$37.68	\$1,659,013
Recordkeeping (Registered with an SAA)	2,139 <i>(Sponsor)</i>	35.6026	76,154	0.25	19,039	\$37.68	\$717,390
<b>Unduplicated Total</b>	<b>3,133</b>	<b>-</b>	<b>252,271</b>	<b>-</b>	<b>63,068</b>	<b>-</b>	<b>\$2,376,403</b>
SAA Recordkeeping							
Recordkeeping	29 <i>(SAA)</i>	73.76	2,139	0.25	535	\$64.76	\$34,647
<b>Unduplicated Total</b>	<b>29</b>	<b>-</b>	<b>2,139</b>	<b>-</b>	<b>535</b>	<b>-</b>	<b>\$34,647</b>
<b>Unduplicated Totals</b>	<b>595,591</b>	<b>--</b>	<b>848,979</b>	<b>--</b>	<b>244,319</b>	<b>--</b>	<b>\$9,310,009</b>

Table 2: Part 30 Requirements (including ETA Form 9039)

Activity	No. of Respondent s	No. of Responses per Responden t	Total Response s	Averag e Burden (Hours)	Total Burden (Hours )	Hourl y Wage Rate	Total Burden Cost
EEO Requirements							
30.3	24,778 <i>(Active Program Sponsors - Nationwide)</i>	1	24,778	2	49,556	\$37.68	\$1,867,270

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<b>Unduplicated Total</b>	<b>24,778</b>	-	<b>24,778</b>	-	<b>49,556</b>	-	<b>\$1,867,270</b>
Affirmative Action Program Requirements							
30.4 30.5 30.6 30.7 30.8 30.9	5,907 (Active Program Sponsors with Five or More Apprentices - Nationwide)	1	5,907	27	159,489	\$37.68	\$6,009,546
<b>Unduplicated Total</b>	<b>5,907</b>	-	<b>5,907</b>	-	<b>159,489</b>	-	<b>\$6,009,546</b>
Sponsor Recordkeeping of Active Apprentices							
30.10 30.12	24,778 (Active Program Sponsors - Nationwide)	1	24,778	2	49,556	\$37.68	\$1,867,270
<b>Unduplicated Total</b>	<b>24,778</b>	-	<b>24,778</b>	-	<b>49,556</b>	-	<b>\$1,867,270</b>
ETA Form 9039 – Complaint Form – Equal Employment Opportunity in Apprenticeship Programs							
ETA Form 9039 30.14	10 (Applicants/Apprentices – Nationwide)	1	10	0.5	5	\$37.68	\$188
<b>Unduplicated Total</b>	<b>10</b>	-	<b>10</b>	-	<b>5</b>	-	<b>\$188</b>
SAA Recordkeeping							
Recordkeeping 30.18 30.19	29 (SAA)	2,626	76,154	0.25	19,039	\$64.76	\$1,232,966
<b>Unduplicated Total</b>	<b>29</b>	-	<b>76,154</b>	-	<b>19,039</b>	-	<b>\$1,232,966</b>
<b>Unduplicated Totals</b>	<b>55,502</b>	<b>--</b>	<b>131,627</b>	<b>--</b>	<b>277,645</b>	<b>--</b>	<b>\$10,977,240</b>

Table 3: Summary Table

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Part 29,	595,591	--	848,979	--	244,319	--	\$9,310,009

Subpart A Requirements (including ETA Form 671 and ETA Form 9186)							
Part 30 Requirements (including ETA Form 9039)	55,502	--	131,627	--	277,645	--	\$10,977,240
<b>Unduplicated Totals</b>	<b>651,093</b>	<b>--</b>	<b>980,606</b>	<b>--</b>	<b>521,964</b>	<b>--</b>	<b>\$20,287,249</b>

Data sources: <https://www.dol.gov/agencies/eta/apprenticeship/about/statistics> and RAPIDS (<https://dol.appiancloud.com/suite/>)

**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 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 respondents or recordkeepers resulting from the collection of information.

**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 burden to the Federal Government is based on the GS-12, Step 5 Federal government compensation of \$104.55\*\*\* per hour for ATR Federal staff. The burden to ATR Federal Staff is primarily for reviewing the materials submitted by the sponsors, inputting data in the database, and returning copies to sponsors and other partners, as appropriate.

\*\*\* The ATR's basic hourly rate is \$46.88 per hour in the Washington, D.C., locality area in 2020 (see [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf)). Based on the most recent data available from the Congressional Budget Office (CBO), the Department estimates that the percentage of Federal employees' total compensation that consists of employee benefits is 69% (see [www.cbo.gov/publications/52637](http://www.cbo.gov/publications/52637)). In addition, total related overhead costs are estimated to comprise an additional 54% of the applicable base wage (source: Guidelines for Regulatory Impact Analysis, 2016, published by the U.S. Department of Health and Human Services, at the following website: [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf)). Accordingly, the total hourly compensation rate for an ATR (adjusted to include employee benefits and overhead costs) is estimated to be \$104.55 per hour (= \$46.88 hourly base wage + \$32.35 in employee benefits + \$25.32 in overhead costs).

For new apprenticeship agreements, the process is estimated to take five minutes. Approximately, 176,117 new apprentices were registered with OA in FY 2019. The annualized cost to the Federal Government for new apprentice registrations is \$1,528,312 [14,618 hours (176,117 x 0.083 hours) x \$104.55\*\*\*]. Estimated annualized cost per apprentice is \$8.68 (\$1,528,312 divided by 176,117).

Also, it is estimated that it takes about five minutes per completion to process approximately 53,042 completions per year. Thus, the total annualized cost to the Federal Government is \$460,229 [4,402 hours (53,042 x 0.083 hours) x \$104.55\*\*\*]. The estimated annualized cost per apprentice completions is \$8.68 (\$460,229 divided by 53,042).

The total annualized cost for all apprentice-related actions is \$1,988,541 (\$1,528,312 + \$460,229).

For new apprenticeship program electronic registrations, the process is estimated to take 45 minutes. Approximately, 994 new programs were registered with OA in FY 2019. The annualized cost to the Federal Government for new program registrations is \$77,994 [746 hours

(994 x .75 hours) x \$104.55\*\*\*\*]. Estimated annualized cost per program registration is \$78.46 (\$77,994 divided by 994).

Of the approximately 994 new programs registered with OA in FY 2019, the majority used previously developed apprenticeship standards. The burden upon the Federal government consists mostly of reviewing apprenticeship standards, and modifying as necessary. The annualized cost to the Federal Government is approximately \$155,884 [1,491 (994 x 1.5 hours) x \$104.55\*\*\*\*].

The total annualized cost for all new program registrations is \$233,878 (\$77,994 + \$155,884).

Of the 24,778 active programs nationwide (29 SAAs + 25 OA states) in FY 2019, approximately 5,907 of these programs have five or more apprentices registered nationwide. Disaggregating this data further, there were approximately 6,961 active programs with fewer than five apprentices, and approximately 2,849 active programs with five or more apprentices that were registered in the 25 federally administered OA states. The process of conducting reviews to ensure a sponsor's compliance in accordance with part 29, subpart A and part 30 is estimated to take 1 hour for those programs with fewer than five apprentices, and 4 hours for those programs with five or more apprentices. The estimated annualized cost for all sponsor compliance reviews is \$727,773 [6,961 (1 hour x 6,961 programs with fewer than five apprentices) x \$104.55] + \$1,191,452 [11,396 (4 hours x 2,849 programs with five or more apprentices) x \$104.55\*\*\*\*] = \$1,919,225.

In accordance with 29 CFR §29.13(e), the process of monitoring an SAA for compliance with the recognition requirements is estimated to take 4 hours. This monitoring occurs every five years by OA's Multi-State Navigators (MSNs), and includes on-site visits, a review of SAA records, as well as a review of the state's applicable legislation, regulations, policies, and/or operating procedures. The estimated cost for all SAA compliance reviews is \$14,422 [116 (29 SAAs x 4 hours) x \$124.33\*\*\*\*].

\*\*\*\* The burden to the Federal Government is based on the GS-13, Step 5 Federal government compensation of \$124.33\*\*\*\* per hour for the MSN. The MSN's basic hourly rate is \$55.75 per hour in the Washington, D.C., locality area in 2020 (see [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf)). Based on the most recent data available from the Congressional Budget Office (CBO), the Department estimates that the percentage of Federal employees' total compensation that consists of employee benefits is 69% (see [www.cbo.gov/publications/52637](http://www.cbo.gov/publications/52637)). In addition, total related overhead costs are estimated to comprise an additional 54% of the applicable base wage (source: Guidelines for Regulatory Impact Analysis, 2016, published by the U.S. Department of Health and Human Services, at the following website: [https://aspe.hhs.gov/system/files/pdf/242926/HHS\\_RIAGuidance.pdf](https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf)). Accordingly, the total hourly compensation rate for a MSN (adjusted to include employee benefits and overhead costs) is estimated to be \$124.33 per hour (= \$55.75 hourly base wage + \$38.47 in employee benefits + \$30.11 in overhead costs).

The total annualized cost for all compliance-related actions is \$1,933,647 (\$1,919,225 + \$14,422).

<u>Type of Action</u>	<u>Total Cost</u>
Apprentice-Related Actions	\$1,988,541
New Program Registrations	\$233,878
Compliance-Related Actions	\$1,933,647
Total	\$4,156,066

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

This ICR is being modified to account for an increase in the information collected relating to state program and apprentice registration (ETA Form 9186), an increase in the total number of responses (i.e., apprentice and program counts), and the addition of the part 30 information collection requirements currently approved under OMB Control No. 1205-0224. The number of responses has increased by 528,676 (from 451,930 to 980,606). The annual burden for this information collection increased from 32,399 hours to 521,964 hours resulting in an increase of 489,565 hours over ETA's previous estimate, which OMB approved through March 31, 2023. Because SAAs are registering programs and apprentices for Federal purposes, the burden for sponsors and apprentices in SAA states/territories has now been accounted for and has resulted in an increase in the number of responses and the annual burden hours. Also, a precise assessment of the time it takes for sponsors to comply with recordkeeping requirements, and the inclusion of an estimated time for the development of program standards by sponsors have resulted in an increase in the annual burden hours.

**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.**

Summary information is used to respond to requests from Departmental leadership, the White House, Congress, public interest groups, advocacy organizations, apprenticeship program sponsors, and the general public.

**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.**

Upon obtaining OMB approval, the expiration date will be displayed on the information collection associated with this ICR. Accordingly, the Department is not requesting a waiver for the display of the OMB expiration date.

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

There are no exceptions to the certification statement.

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

This information collection does not employ statistical methods.