

SUPPORTING STATEMENT FOR INTERNATIONAL TRAINING APPLICATION

OMB CONTROL NO. 1220-0179

This ICR seeks to extend the International Training Application.

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 purpose of this request for review is for the Bureau of Labor Statistics (BLS) to obtain clearance to collect the information needed to enroll participants in the international training programs of BLS. The BLS is one of the largest labor statistics organizations in the world and has provided international training in labor market information and price indexes since 1945. Each year, the BLS conducts training programs of 1 to 2 weeks duration at its training facilities in Washington, DC.

Each training program is designed to strengthen the participants' ability to collect and analyze economic and labor statistics. Typical participants are statisticians, economists, analysts, and other data producers and users from agencies of other nations; usually, they are from Ministries of Labor or Finance or from the statistical agencies. Training programs include lectures, discussions, and workshops.

The BLS is given broad authority under Title 29 of the U.S. Code “to acquire and diffuse among the people of the United States useful information on subjects connected with labor, in the most general and comprehensive sense of that word.” In carrying out the broad range of statistical activities assigned to the BLS, the Secretary’s (of Labor) Order 9-75 specifies that the Commissioner of Labor Statistics is delegated authority and assigned responsibility for providing advice, assistance and services to “other Department of Labor components, other departments of the executive branch of the Federal Government, State and local government jurisdictions, and other public and private agencies.”

29 U.S.C. 9 authorizes the Department of Labor, within the discretion of the Secretary of Labor, upon the written request of any person, to make special statistical studies relating to employment, hours of work, wages, and other conditions of employment. The BLS has broadly interpreted “special statistical studies” under 29 U.S.C.9 to include, among other things, statistical training.

The U.S. Agency for International Development determined that BLS may provide training in labor, price, and productivity statistics to agencies of friendly, foreign governments and

international organizations under Sections 607 and 627 - 630 of the Foreign Assistance Act (FAA) of 1961 as amended, 22 U.S.C. 2357.

BLS reviews and updates costs on an annual basis to ensure recovery of the full cost associated with seminars for the international technical assistance program. These costs may change to account for adjustments in direct and indirect costs. Costs for each course are listed on the International Technical Cooperation page of the BLS website.

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.

Potential participants, their employers, or sponsors complete the Training Application to provide their names, employers, titles, job duties, contact information, and other information required to determine the suitability of potential participants for the BLS international training and to enroll those who are deemed to be suitable. The approval of this collection of information will support the administrative duties of the BLS to register applicants for the training programs.

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.

All applicants submit their application electronically via the web. Applicants also have the option of submitting their applications via email. Applicants may contact BLS staff if they need to submit via conventional mail, but since this option has not been used the BLS address is being removed from the application form and the website. The fax number is also being removed from the form, as applicants have not utilized that submission option for several years.

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

The information collected will not duplicate any existing information being collected by the BLS.

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

The information is collected from individuals; no small businesses or other small entities are involved.

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.

In order for a person to be considered for training at the Bureau of Labor Statistics, he/she must complete this application, so that the Bureau has the necessary information to register a person in a program or programs.

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. The data are collected in a manner that is consistent with the guidelines in 5 CFR 1320.5.

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.

One comment was received as a result of the Federal Register notice published in 87 FR 3355 on January 21, 2022.

The comment expressed concern that taxpayer funds are being used to support the international training programs of the BLS and questioned why the programs weren't being paid for by the attendees. In fact, the Bureau's international training programs are funded by the attendees or their organizations (national statistical offices of foreign governments or other international organizations) not U.S. taxpayers. The form in question (OMB 1220-0179) allows BLS to collect information from foreign citizens who pay to attend the international training programs.

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

No payments or 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.

The BLS does not provide an express assurance of confidentiality to respondents. However, as a practical matter, information would only be released in accordance with the Freedom of Information Act (5 U.S.C. 552) and its attendant regulations codified at 29 CFR part 70.

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.

No sensitive data will be collected.

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. General, 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.**

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
International Training Application	100	1	100	0.34	34	\$7.25	\$246.50

* [Hourly Rate is based on the federal minimum wage of \$7.25 per hour, according to *The Fair Labor Standards Act of 1938, As Amended*, revised May 2011, <http://www.dol.gov/whd/regs/statutes/FairLaborStandAct.pdf>]

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.**

a. Capital start-up costs: \$0

b. Total operation and maintenance and purchase of services: \$0

There are no costs to the potential participants (applicants) other than the time it takes to complete the application. Applicants complete the form based on personal knowledge and experience, which requires no record-keeping or other expenses. Please note that applicants are from countries other than the United States.

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.

We estimate that it costs the Federal Government approximately \$25.00 per training applicant or \$2,500 for 100 applicants to process the Training Application, which includes staff time to determine potential participants' suitability to attend a BLS training program, further contact with individuals to acknowledge receipt of the applications, notify them of their acceptance into a training program, and other administrative tasks.

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

None.

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.

The information collected will not be used for publication, but rather for program operational purposes, including the determination of potential participants' suitability to attend a BLS training program, further contacts with individuals to acknowledge receipt of the applications, their acceptance into a training program, and other administrative purposes.

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.

BLS is requesting OMB approval for permission to suppress the expiration date on the application forms. An expiration date would restrict BLS' ability to use these same forms in subsequent years.

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.