

Student Data Form (OSHA Form 182)
OMB Control Number: 1218-0172
Expiration Date: July 31, 2023

**SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS OF THE
STUDENT DATA FORM (OSHA FORM 182)
OFFICE OF MANAGEMENT AND BUDGET (OMB)
CONTROL NUMBER 1218-0172 (June 2023)**

This is an extension request for a currently approved data collection.

A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Section 21 of the Occupational Safety and Health Act of 1970 (OSH Act or Act) (29 U.S.C. 670) authorizes the Occupational Safety and Health Administration (OSHA or agency) to conduct education and training courses. These courses must ensure an adequate number of qualified personnel to fulfill the purposes of the OSH Act, provide them with short-term training, inform them of the importance and proper use of safety and health equipment, and train employers and workers to recognize, avoid, and prevent unsafe and unhealthful working conditions.

Under Section 21, the OSHA Training Institute (OTI or Institute) provides basic, intermediate, and advanced training and education in occupational safety and health for Federal and State compliance officers, whistleblower investigators, agency professionals and technical-support personnel, employers, workers, organizations representing workers and employers, educators who develop curricula and teach occupational safety and health courses, and representatives of professional safety and health groups. The Institute provides courses on occupational safety and health and whistleblower protection at its national training facility in Arlington Heights, Illinois.

All course information, materials, tests, and virtual links are now managed through a learning management system. Non-Federal OSHA students attending Institute courses must request new user login credentials to access the learning management system. New user credentials can be requested through <https://oshaelearning.geniussis.com/PublicWelcome.aspx>. The registration form requires that the new user applicant provide information on their job specialization and affiliation and can be accessed through the button labeled "New User (other than federal OSHA)." (Last accessed: February 7, 2023)

The OSHA Office of Training and Education uses the collected job specialization and affiliation information to sort reporting data quarterly, especially total student attendance, student

attendance by each offered course, and student demographics and job affiliations (e.g., safety, health, and whistleblower investigator job titles).

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The agency uses the information compiled from the Student Data Form (SDF or Form), developed by its Office of Training and Education, to demonstrate, in an accurate and timely manner, that it is providing the training and worker education mandated by Section 21 of the OSH Act. This information is also helpful in evaluating training, and in making decisions regarding program/course revisions, budget support, and tuition costs.

This form is used by non-Department personnel, including those in the private sector, for requesting information pertaining to enrollment in Institute courses. The information in the “Personal Data” and “Supervisor Data” categories allows OSHA to contact students if an emergency arises at their home, place of employment, or in local accommodations, and to alert supervisors of a trainee’s injury or illness.

- 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 burdens.**

The Student Information form is located on the agency’s learning management system home page (located at <https://oshaelearning.geniussis.com/PublicWelcome.aspx><https://oshaelearning.geniussis.com/PublicWelcome.aspx>). The registration form requires that the new user applicant provide information on their job specialization and affiliation and can be accessed through the button labeled “New User (other than federal OSHA).” The student selects the New User button to access all the necessary fields to create their account. After completing the data entry form, a notice is sent to agency administrative staff for electronic approval and ultimate account creation.

- 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 collection requirements of the SDF are specific to each student involved, and no other source or agency duplicates these requirements or can make the required information available to OSHA (i.e., the required information is available only from the student).

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

The agency collects information as part of the training courses attended by students in their individual capacity; the information provided on the SDF has no direct impact on any business, regardless of its size. Accordingly, this paperwork requirement does not have a significant impact on a substantial number of small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The information collection frequency specified in this requirement is the minimum the agency believes necessary to ensure proper compliance and monitoring methods are maintained. If OSHA could not collect the information provided on the SDF or obtained it less frequently, the agency would not have necessary and comprehensive data to use while documenting its timely and full compliance with section 21 of the OSH Act; planning timely program and course revisions, budget support, and tuition cost changes; and effectively managing student-related emergencies that may arise during training.

This information is also necessary to document student enrollments and to maintain the agency's Accredited Provider certification through the International Accreditors for Continuing Education and Training (Accreditation No. 1001788-4, Expires: March 31, 2027).¹

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;**

¹ The agency's Certification of Accreditation can be viewed through the International Accreditors for Continuing Education and Training (IACET) website (<https://www.iacet.org>). Under the "Affiliates" drop-down menu in the top banner, select "Accredited Provider's List. The agency is listed under "US Department of Labor, Occupational Safety and Health Administration (OSHA), Office of Training and Education (OTE)."

- **Requiring the use of a 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 agency believes that no special circumstances exist that would cause it to collect the information required by the SDF in a manner or using procedures that differ from the description provided in Item 2 above.

- 8. If applicable, provide a copy and identify the data 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.

As required by the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the *Federal Register* on (March 21, 2023) (88 FR 17026), soliciting comments from the public and other interested parties on the information collection requirements contained in the Student Data Form (Docket Number OSHA-2010-0022). The notice is part of a preclearance consultation program intended to provide those interested parties with an opportunity to comment on OSHA's request for an extension by the Office of Management and Budget (OMB) of a previous approval of the information collection requirement. The agency did not receive any public comments in response to this notice.

This form is used by non-Department personnel, including those in the private sector, for requesting information pertaining to enrollment in Institute courses. The information in the

“Personal Data” and “Supervisor Data” categories allows OSHA to contact students if an emergency arises at their home, place of employment, or in local accommodations, and to alert supervisors of a trainee’s injury or illness. This information is also necessary to document student enrollments and to maintain the agency’s Accredited Provider certification through the International Accreditors for Continuing Education and Training (Accreditation No. 1001788-4, Expires: March 31, 2027). The program will consider changes to the form as necessary to stay in compliance with our accreditation.

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

OSHA will not provide payments or gifts to the student-respondents.

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

The agency has determined that none of the information collected in the SDF qualifies as confidential information, and accordingly provides no assurances of confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The agency has determined that none of the information collected in the SDF qualifies as sensitive information.

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

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

On average, 2,000 students must complete the Student Data Form annually. These students attend instructor-led courses that are entirely self-paced and virtual. The information collection occurs once for each student and is used for the duration of their relationship with the Institute.

Wage Rates

The agency determined the wage rate from mean hourly wage earnings to represent the cost of employee time. For the relevant standard occupational classification category, OSHA used the wage rates reported in the Bureau of Labor Statistics (BLS), U.S. Department of Labor, *Occupational Employment and Wage Statistics (OEWS), May 2021* [date accessed: June 29, 2022]. (OEWS data is available at <https://www.bls.gov/oes/tables.htm>. To access a wage rate, select the year, “Occupation profiles,” and the Standard Occupational Classification (SOC) Code.)

To derive the loaded hourly wage rates presented in the table below, the agency used data from the Bureau of Labor Statistics’ OEWS report, as described in the paragraph above, and applied to the wage rate a fringe benefit markup from the following BLS release: *Employer Costs for Compensation News Release* text, released 10:00 AM (EDT), December 15, 2022 (https://www.bls.gov/news.release/archives/ecec_12152022.htm). BLS reported that for civilian workers, fringe benefits accounted for 31.0 percent of total compensation and wages accounted for the remaining 71.0 percent; for state and local government workers, fringe benefits accounted for 38.1% of total compensation and wages accounted for the remaining 61.9%; and for private industry workers, fringe benefits accounted for 29.5% of total compensation and wages accounted for the remaining 70.5%.

To calculate the loaded hourly wage for each occupation, the agency divided the mean hourly wage rate by 1 minus the fringe benefits, as shown in Table 1. For purposes of burden calculations in this package, the agency took an average the three independent loaded hourly wages.

Table 1: Wage Hour Estimates				
Occupational Title	Standard Occupational Code	Mean Hour Wage Rate (a)	Fringe Benefits (b)	Loaded Hourly Wage Rate (c) = (a)/(1-(b))
Occupational	19-5011	\$37.86	.310	\$54.87

Health and Safety Specialist (Civilian Student)				
Occupational Health and Safety Specialist (State & Local Government Student)	19-5011	\$37.86	.381	\$61.06
Occupational Health and Safety Specialist (Private Industry Student)	19-5011	\$37.86	.295	\$53.32
<i>Average Loaded Hourly Wage Rate Across All Sectors</i>				\$56.42

OSHA estimates that it takes the average student 5 minutes (5/60 hour) to complete the Form.

Burden Hours: 2,000 students x 5/60 hour = 167 hours (rounded)

Cost: 167 hours x \$56.42 = \$9,422.14

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Table 2: Summary of Annualized Respondent Hour and Cost Burden

Collection of Information	Type of Respondent	Number of Respondents	Number of Responses	Total Number of Responses	Average Response Burden (hours)	Total Burden Hours	Loaded Hourly Wage	Total Burden Cost
Student Data Form	Occupational Safety & Health Specialist	2,000	1	2,000	5/60	167	\$56.42	\$9,422.14
TOTAL		2,000	---	2,000	---	167	---	\$9,422 (rounded)

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 startup cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and startup 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 the respondents other than their time, as estimated under Item 12.

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), and 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 single table.

Capital Cost Determinations

OSHA estimates that the total annual cost to the Federal Government for collecting and maintaining the information associated with SDF activities is \$5,193.

In determining the capital cost of this paperwork requirement, the agency supplemented wage information pulled from Item 12 with the Office of Personnel Management's (OPM) *Salary Table 2023-CHI*, showcasing the General Schedule (GS) Locality Pay for the Chicago-Naperville region. The table is available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/CHI_h.pdf (last accessed on February 7, 2023).

To determine the hour burden associated with these calculations, the agency continued the assumptions of processing time that was used in the last approved package and decreased the averages by a factor of 20% to account for the decrease in average student enrollments during 2022.

1. Management Services Specialist Salary

In the most recent OMB-approved package, the agency estimated that a federal management services specialist would spend 5% of their time on projects related to the Form (2,080 hours x 5% = 104 hours). Factoring in the assumed 20% reduction in workload, the agency estimates that a federal management services specialist will spend 83 hours on Form-related activities (104 hours x 20%, rounded).

The agency further assumes that the average federal management services specialist will be a GS-11, Step 5, making \$41.81 per hour.

Cost: 83 hours x \$41.81 = \$3,470.23

2. Secretary and Administrative Assistant Salary

In the most recent OMB-approved package, the agency estimated that a federal employee in a clerical or administrative assistant position would spend 2.5% of their time on projects related to the Form (2,080 hours x 2.5% = 52 hours). Factoring in the assumed 20% reduction in workload, the agency estimates that a federal employee in a clerical or administrative assistant position will spend 42 hours on Form-related activities (52 hours x 80%, rounded).

The agency further assumes that the average federal employee will be a GS-7, Step 5, making \$28.25 per hour.

Cost: 42 hours x \$28.25 = \$1,186.50

3. Occupational Safety and Health Specialist or Industrial Hygienist Salary

In the most recent OMB-approved package, the agency estimated that a federal employee in an occupational safety and health specialist or industrial hygienist role would spend five minutes (5/60 hour) on each of the 129 courses provided through the Institute, for a total of 11 hours (5/60 hours x 129 courses, rounded). Factoring in the assumed 20% reduction in workload, the agency estimates that a federal employee will spend 9 hours on Form-related activities (11 hours x 80%, rounded).

The agency further assumes that the average federal employee will be a GS-13, Step 5, making \$59.59 per hour.

Cost: 9 hours x \$59.59 = \$536.31

Table 3: Summary of Capital Cost Determinations			
	Units	Unit Cost	Total Capital Cost
A. Salaries			
Management Services Specialist (GS-11, Step 5)	83 hours	\$41.81	\$3,470.23
Secretary and Administrative Assistant (GS-7, Step 5)	42 hours	\$28.28	\$1,186.50
Occupational Safety and Health Specialist or Industrial Hygienist (GS-13, Step 5)	9 hours	\$59.59	\$536.31
TOTAL	---	---	\$5,193 (rounded)

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

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The agency is requesting a decrease in the burden hour estimate of 166 hours (from 333 hours to 167 hours). This reduction is a result of decreased student enrollments in Institute courses that occurred during the COVID-19 pandemic.

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 the report, publication dates, and other actions.

OSHA will not publish the information collected under this requirement.

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.

OSHA will display the OMB Control Number and expiration date on OSHA Form 182. Additionally, OSHA publishes the requirement's expiration date in the *Federal Register* notice announcing OMB approval. The agency believes that this is the most appropriate and accurate mechanism to inform interested parties of the expiration dates.

18. Explain each exception to the certification statement.

OSHA is not requesting an exception to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This supporting statement does not contain any collection of information requirements that employ statistical methods.