

**SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS OF THE
SUSAN HARWOOD TRAINING GRANT
PROGRAM GRANTEE QUARTERLY PROGRESS
REPORT OFFICE OF MANAGEMENT AND
BUDGET
(OMB) CONTROL NO. 1218-0100
(June 2023)**

This information Collection Request (ICR) is a revision to add race, ethnicity, and language to a currently approved data collection. By conducting an equity assessment to meet the requirements of **Executive Order (EO) 13895** on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government and the DOL Evidence Building Act Evaluation Plan, Project 38 (See Section 15).

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 (the "OSH Act") (29 U.S.C. 670) authorizes the Occupational Safety and Health Administration (OSHA) to conduct directly, or through grants and contracts, education, and training courses. These courses must ensure an adequate number of qualified personnel to fulfill the purposes of the 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 Agency awards training grants to nonprofit organizations to provide part of the training. Organizations that receive these grants must submit the Grantee Quarterly Progress Report (GQPR; OSHA 171, Revised 5/14) as required by the Department of Labor under 29 CFR 95.51. This regulation states that grant recipients (grantees) must submit progress reports to the awarding Agency at least annually but no more than quarterly. The reports must contain a comparison of actual accomplishments with goals and objectives established for the reporting period and, if appropriate, the program's output. Therefore, the GQPR allows OSHA to monitor a grantee's performance and to determine if a recipient is using funds as specified in its grant application.

- 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.**

After the grant recipient submits a GQPR, the Agency compares the information provided by the grant recipient in the report to the quarterly milestones proposed by the grant recipient in the work plan and budget that accompanied its grant application. This information includes identifier data (organization name, grant number, and period covered by the report); the date and location where the training occurred; the number of workers and employers attending training

sessions provided by the organization during the quarter; the class length (in quarter hours); the language used to deliver the training; a description of the training provided; a narrative account of grant activities during the quarter (including capacity building activities, needs assessment activities, development of training materials/curriculum, evaluation activities, and other educational activities); and an evaluation of progress regarding planned versus actual work accomplished. Using this information, OSHA can determine if the grant recipient is meeting the proposed program goals and objectives, as described in the grant proposal, and is spending funds consistent with the proposed budget.

The lack of disaggregated demographic data variables impedes efforts to measure and advance equity. Section 9 of the EO 13895 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government requires each Agency to evaluate whether their policies produce racially inequitable results when implemented and make necessary changes to ensure underserved communities are adequately supported. Our first step is to collect disaggregated age, race, ethnicity, gender, and language datasets to make informed program decisions and strategies.

Requiring these reports on a quarterly basis enables the Agency to identify training and expenditure discrepancies in a timely fashion so that it can implement appropriate action. In addition, this information permits OSHA to assess a grant recipient's ability to meet projected milestones and expenditures.

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.

Grant recipients are provided access to an electronic copy of the GQPR via the OSHA Regional Office and may compile the required information using personal computers. Grant recipients send the GQPR to OSHA (usually an OSHA Regional Office) via e-mail. The use of electronic format reduces the burden of double entry and errors in data transfer. In addition, it aids OSHA in meeting their reporting requirements as required by the Department of Labor under 29 CFR 95.51.

The addition of the Trainee Data form with aggregated ethnicity and race for the training recipient to complete, accompanying the GQPR meets the requirements of the EO. Grant recipients compile the required data utilizing the existing process and a website portal to send the GQPR to an OSHA Regional Office.

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 2 above.

The paperwork requirements of the GQPR are specific to each grant recipient, 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 grant recipient).

5. If the collection of information impacts small businesses or other small entities, describe

any methods used to minimize burden.

The GQPR obtains only the minimum information necessary from the grant recipient for OSHA to monitor program goals and objectives, as well as grant expenditures, in a timely manner as required by Department of Labor regulation 29 CFR 95.51. OSHA grants are issued to approximately 90 non-profit organizations annually. Grant recipients are both large and small entities. Information collected only impacts the grant recipients.

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.

If OSHA could not collect the information provided on the GQPR, or if it was obtained less frequently (greater than quarterly), it could not intervene in a timely manner if the grant recipient fails to meet program goals or spends funds inappropriately.

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 prove 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 GQPR 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 January 26, 2023 (88 FR 5041) requesting public comment on its proposed extension of the information collection requirements specified by the GQPR. The docket number is OSHA-2010-0021. This notice is part of a preclearance consultation program intended to provide interested parties the 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 requirements contained in the GQPR. The Agency received two public comments in response to this notice.

The first commenter expressed that she was not in favor of taxpayers funding this program including for those that do not speak English (OSHA-2010-0021-0014).

OSHA's Response: The agency acknowledges receipt of your comment and thanks you for your feedback.

The second commenter provided 3 recommendations for the Agency to consider (OSHA-2010-0021-0018). Below are the recommendations from the commenter and the Agency's responses:

Recommendation 1: Collect disaggregated data on race, ethnicity and language, but enable grantees to make it optional for trainees to self-report this personal information. Permit the anonymous self-reporting of such data by trainees.

OSHA's Response: The agency intends for this collection to be optional for all trainees and for all data reported to the agency to be free from any personally identifying information including name.

Recommendation 2: Include the category "Some other race" for race reporting; allow individuals to report more than one race.

OSHA’s Response: OMB is actively revising Directive #15, which is the standard that we must currently follow. We are limited to the five race categories that are currently approved. The standard requires that we allow more than one race to be chosen to represent “multi- racial” respondents. Once the revision is finalized, we will have to use the new categories/selections. “Other” may or may not be available for future use.

Recommendation 3: Require grantee reporting of the language in which each training is delivered, while giving trainees the option to self-report the language in which they feel most comfortable conversing.

OSHA’s Response: The agency intends to require grantees to report the language in which each training is delivered and will consider giving trainees the option to self-report the language in which they feel most comfortable conversing.

Also, OSHA is revising this ICR to add race, ethnicity, and language to the currently approved data collection in this notice. By conducting an equity assessment to meet the requirements of **Executive Order (EO) 13895** on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government and the DOL Evidence Building Act Evaluation Plan, Project 38.

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 any grantee to complete the GQPR.

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

The Agency provides no assurance of confidentiality regarding the information collected in the GQPR because it believes that none of this information is confidential.

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 believes that collecting sexual attributes (gender) information in the GQPR is sensitive. Equity and gender data will be collected according to the OMB Standard on Ethnicity and Race data collections.

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 collection of information, identifying and using appropriate wage rate categories. The cost of contracting out paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Over the last three years (FY 2019 - FY 2021), OSHA managed an average of 93 grants per year. The Agency estimates that it takes each grant recipient 17 hours per quarter, or 68 hours per year, to collect, compile, and maintain the information specified on the GQPR, including ethnicity and race data and the narrative description of progress made in achieving program goals and objectives.

The average annual number of trainees that have been trained over the last three years is 45,648. The Trainee Data collection process burden estimate per trainee is five (5) minutes, completed as part of the training requirement.

Wage Rate Determinations

The Agency utilized a standardized wage rate methodology similar to those used in other Agency ICRs to calculate PRA labor costs. 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, U.S. Department of Labor, Occupational Employment Statistics (OES), May 2021 [date accessed: September 12, 2022]. (OES 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 rate presented in the table below, the Agency used data from the Bureau of Labor Statistics' (BLS) *Occupational Employment Statistics (OES)*, as described in the paragraph above. Then, the Agency applied to the wage rates a fringe benefit markup based on data found in Table 1 of the following BLS release: *Employer Costs for Employee Compensation* news release text, released 10:00 AM (EDT), December 2022 ([Employer Costs for Employee Compensation - September 2022 \(bls.gov\)](https://www.bls.gov/news.release/empcost22.txt)). BLS reported that for civilian workers, fringe benefits accounted for 31.0 percent of total compensation and wages accounted for the remaining 69.0 percent. To calculate the loaded hourly wage for each occupation, the Agency divided the mean hourly wage rate by 1 minus the fringe benefits.

TABLE 1- WAGE HOUR ESTIMATES (2022)
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Occupational Title	SOC	Mean Hour Wage Rate (A)	Fringe Benefits (B)	Loaded Hourly Wage Rate (C) = ((A)/(1-(B)))
Occupational Health and Safety Specialist	19-5011	\$37.86	0.31	54.87
Secretaries and Administrative Assistants	43-6014	\$19.75	0.31	\$28.62

OSHA divides the 68 hours required annually into 10 hours for the grantee’s project director and 7 hours for an administrative assistant.

Data Collection Instrument /Respondent Type	Total No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Time per Response (In Hrs.)	Total Burden Hours	Loaded Hourly Wage Rates	Total Burden Costs
Quarterly Progress Form (Health Specialist)	93	4	372	10	3,720	\$54.87	\$204,116.40
Quarterly Progress Form (Admin. Secretaries)	93	4	372	7	2,604	\$28.62	\$74,526.48
Training Data Form (Trainees)	45,648	1	45,648	5/60	3,804	\$54.87	\$208,725.48
Totals	45,834	-	46,392	--	10,128	--	\$487,368.36

Table 2- Estimated Annualized Respondent Burden Hours and Costs

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 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 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 the respondents other than their time.

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.

The cost to the federal government involves staff review and analysis of the OSHA 171 quarterly progress reports. The Harwood grantees submit a quarterly report to an OSHA regional office where a Program Analyst/Grants Manager reviews the report and provides a written summary of the grantee's performance and the number of workers trained to the OSHA Office of Training and Education (OTE).

The cost for ten regional staff to review and summarize the OSHA 171 progress reports using an average grade of GS-13, Step 5, an average salary of \$116,500¹, and an average of 3 hours per quarter per grantee is **\$62,295** [(3 hours x \$55.82 hourly rate) x 93 grantees x 4 quarters].

The cost for the Harwood Grants Coordinator, GS 13, Step 10, salary of \$138,868², in Washington, DC and GS13, Step 5, salary of 4112,874 located in Atlanta, GA, who spends an

¹ Source: U.S. Office of Personnel Management, *General Schedule and Locality Tables, Salary Table 2022-RUS*, www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/CHI_h.pdf The basis for the hourly wages for professional staff is the 2022 government pay scale for a Chicago area GS-13, step 10 (\$65.38). Usually PhDs, certified safety professionals, certified Industrial Hygienists, and other professional staff submit applications.

² Source: U.S. Office of Personnel Management, *General Schedule and Locality Tables, Salary Table 2022-CHI* https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/CHI_h.pdf The basis for the hourly wages for clerical staff is the 2022 government pay scale for a Chicago area GS-7, step 10 (\$30.98). Clerical elements are performed by secretaries and accounting staff.

average of 30 minutes per grantee to review the regions' summary evaluates and to compute training numbers is **\$11,218** [.5 hours x \$60.31 hourly rate) x 93 grantees x 4 quarters].

Therefore, the **total annual federal review cost is \$73,513 (\$62,295 + \$11,218).**

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

This is a revision that will impact the total burden due to the addition of required aggregated demographic information collected under EO 13985. A trainee data form was created to be completed by the trainees and submitted to OSHA by the grant recipients. The Agency is requesting a total increase of burden hours from 6,160 hours to 10,128 hours, difference of 3,968 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 the report, publication dates, and other actions.

OSHA will not publish the information collected in the GQPR.

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.

The expiration date is displayed on the GQPR.

18. Explain each exception to the certification statement in ROCIS.

OSHA is not seeking an exception to the certification statement in ROCIS.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

The grant forms employ no statistical methods.