## SUPPORTING STATEMENT FOR THE INFORMATION COLLECTION REQUIREMENTS OF THE

**SAFE + SOUND CAMPAIGN OFFICE OF MANAGEMENT AND BUDGET (OMB) CONTROL NO. 1218-0269 (July 2024)**

This ICR seeks to revise a currently approved generic data collection. OSHA is requesting to include modified data collection instruments in this ICR. Modifications are made to the Safe + Sound Event Registration and the Safe and Sound Feedback Forms which will allow OSHA to better understand how participants engage with the Campaign and their experiences related to participation.

## 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 (2)(b)(1) 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” or the “Agency”) to assure safe and healthful working conditions by encouraging employers and employees to reduce the number of occupational safety and health hazards at their places of employment and to stimulate employers and employees to institute new and to perfect existing programs for providing safe and healthful working conditions.

In 2016, OSHA established the Safe + Sound Campaign, a voluntary effort to support the implementation of safety and health programs in businesses throughout the United States. Outside stakeholders, including safety and health professional organizations, trade and industry associations, academic institutions, and state and federal government agencies, collaborate with the Agency on the Campaign. The Campaign includes periodic activities and events, ranging from regular email updates to quarterly national webinars to local meetings to an annual national stand down (i.e., Safe + Sound Week), designed to increase overall employer and employee awareness and understanding of safety and health programs and promote employer adoption of these programs. OSHA believes widespread implementation of such programs will substantially improve overall workplace safety and health conditions.

To gain the information needed to support this voluntary effort, OSHA is proposing to continue to survey, and in some cases interview, those participating in Campaign activities. To date, this information has been analyzed and used to make program improvements and update support materials and tools. For the purposes of this supporting statement, “participant” refers to organizations that participate in Campaign events as well as those that collaborate with OSHA on the Campaign (e.g., event partners). The goal of the information collection is to understand and respond to the needs of participants and publicly highlight outcomes to enhance the effectiveness of the Campaign. The scope of any future modifications to this information collection is limited to the addition of questions about participant activities related to Safe + Sound Campaign events

and information on safety management processes and outcomes related to these activities related to safety and health performance (e.g. safety and health program implementation). These modifications, however, will not request the respondent to attribute a particular outcome to the Safe + Sound Campaign, since measurement of an outcome from the program would require a robust study design including a control. OSHA intends to update these forms ahead of a Safe + Sound Campaign, depending on the focus of that year’s program.

## 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.

* + 1. **Event Registration**

Information Collected: Basic participant information (e.g., name, company, industry, city, state, country, contact details).

Purpose: To sign-up participants for events and ensure they receive information and updates about the events for which they registered. To improve communications for events.

## Recruitment

Information Collected: Basic organizational information (e.g., name, company, industry, number of employees/members, role in organization, city, state, zip code, and contact details), questions to ascertain interest in playing a role in the organization and promotion of Campaign activities.

Purpose: To provide information about the Campaign and encourage outside stakeholder groups (e.g., safety and health professional organizations, trade and industry associations, academic institutions, and state and federal government agencies) to join and stay engaged in the effort.

## Event Customer Feedback

Information Collected: Basic participant information (e.g., participant name, company, industry, number of employees, role in organization, city, state, zip code, contact details), how participant learned about the event, participant feedback on event (e.g., satisfaction with event, satisfaction with resources provided, suggestions for improvements). For some events, such as Safe + Sound Week, also what participant did, outcomes of participation, interest in speaking with OSHA staff member about their experience.

Purpose: To provide participant recognition (e.g., generate certificates of participation) and to make program improvements and update events, webpages, support materials, and tools.

## In-Depth Follow-Up and Case Study Interviews

Information Collected: Narrative information about participant experience (e.g., details about event planning and execution, lessons learned, how activities improved safety and health in participant organization).

Purpose: To develop case studies to share publicly on a variety of media platforms (e.g., websites, videos, emails, webinars, blogs, and newsletters).

## Focus Group Interviews

Information Collected: Narrative information about participant experiences with their organization’s safety and health programs (e.g. motivations, outcomes, strategies).

Purpose: To develop resources and materials to share publicly to support the implementation of successful safety and health programs.

In addition to the purposes listed above, OSHA and outside stakeholder collaborators plan to use the information that is collected to publish and distribute an annual summary report for the Campaign.

Since 2017, the Agency collected data on overall participation, program effectiveness, areas for improvement, problem areas participants encountered, and quality of compliance assistance material through two customer satisfaction surveys, as well as conducted follow-up calls with participants who indicated they were interested in speaking to an OSHA staff member on the initial survey. To date, this information has been analyzed and used to make program improvements and update support materials and tools.

## 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.

OSHA proposes to use primarily web forms and web surveys (e.g., Survey Monkey) to collect information from those participating in Campaign activities. In some cases, the Agency will conduct phone calls for in-depth follow-up, case study interviews, and focus groups.

## 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.**

Since the Campaign activities are unique to OSHA, the Agency is in the best position to coordinate the collection, analysis, and publication of information related to the effort.

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

This voluntary information collection will be open to all participants in Campaign activities, including entities defined as small by the Small Business Administration. OSHA intends to reduce the burden for respondents by using web-based tools to collect information and limit the number of questions and the time required to answer the voluntary questions. Where more in- depth follow-up, case study, or focus group interviews are conducted for participants who are interested in doing so, the Agency plans to use a streamlined and focused process for conducting these conversations.

## 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.

Without this collection, OSHA will lack information about the effectiveness of Campaign activities and will not have the feedback necessary to make program improvements or share useful information about best practices with others that could benefit from it.

Various Campaign activities (e.g., national webinars, local meetings) will take place throughout the year including a Safe + Sound Week, an event that will be held annually. OSHA intends to collect information from participants following each event in order to get the feedback needed to make program improvements, including those specific to each unique event. As a result, conducting less frequent collections would not allow the Agency to achieve this objective.

However, OSHA expects that organizations will not participate in every activity, and thus, will not be subject to the collection on a regular basis. While participants will be offered the opportunity to provide feedback at each event, providing information to the Agency in all cases is completely voluntary.

## 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;**

This information collection is voluntary. However, OSHA intends to collect information from participants following each event, potentially more often than quarterly, in order to get the feedback needed to make program improvements, including those specific to each unique event. Despite this, OSHA expects that organizations will not participate in every activity, and thus, will not be subject to the collection on a regular basis.

## requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

This information collection is voluntary. Web-based tools and phone interviews are the primary mechanisms for this collection, thus, no written responses will be solicited.

## requiring respondents to submit more than an original and two copies of any document;

This information collection is voluntary. However, to develop case studies of successful participants, the Agency may ask respondents to submit electronic copies of materials (e.g., word documents, photos, and videos) used in their Campaign activities but would not request two copies of such material.

## requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

Respondents will not be asked to retain any records in association with this information collection.

## 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;

Participation in the Safe + Sound Campaign is voluntary and, thus, adequate information to develop representative sampling frames is not available. OSHA’s post-event surveys will be open to all participating organizations. In-depth follow-up

and case study interviews will be pursued based upon information received from post- event survey respondents and other information acquired through publicly available media channels (e.g., press releases, YouTube videos, tweets, social media posts).

The goal of the in-depth follow-up and case study interviews is to highlight particularly good examples of engagement and outcomes for the benefit of current and future participants.

## requiring the use of statistical data classification that has not been reviewed and approved by OMB;

OSHA will not use any statistical data classifications for this collection.

## that includes a pledge of confidentially 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

The information collection does not include any pledges of confidentiality regarding the data provided by the respondent.

## 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 confidentially to the extent permitted by law.

The survey does not solicit trade secrets or other confidential information.

## A. 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.**

As required by the Paperwork Reduction Act (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the *Federal Registe*r on April 29, 2024 (89 FR 33399) soliciting public comments on its proposal to extend the Office of Management and Budget‘s (OMB) approval of the information collection requirements specified in the Safe + Sound Campaign .under docket number OSHA-2017-0013. This notice was part of a preclearance consultation program that provides interested parties the opportunity to comment on OSHA’s request for an extension by OMB of a previous approval of the information collection requirements found in the above Standard. The Agency did not receive any comments submitted in response to this notice.

## 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.

OSHA has consulted with outside stakeholders, including safety and health professional organizations, trade and industry associations, and state and federal government agencies, collaborating with the Agency on the Campaign. Co-sponsors of the Safe + Sound Week event reviewed and commented on the web-based survey tools used to collect routine customer feedback from participants and partner organizations annually. Since many of their members were potential respondents to this collection, they were well qualified to provide feedback on this data gathering effort.

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

No payments, gifts, or other remuneration will be offered to respondents.

For the annual Safe + Sound Week event, participants will be able to download a certificate and web badge after submitting information.

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

The collection does not include any pledges of confidentiality.

## 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 questions of a sensitive nature will be asked.

1. **​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 13.**

**Respondent Burden Hours and Cost Determinations:**

OSHA’s estimates of the burden hours and costs for each information collection are calculated below. Costs and burden hours are rounded to total dollar and hour amounts. The number of respondents is based on the number of participants from Campaign activities and events conducted in 2023 or projections for the number of participants in Campaign events to be held beginning in 2024.

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 and Wage Statistics (OEWS), May 2023 [date accessed: April 16, 2024)]. (OEWS data is available at: https://[www.bls.gov/oes/current/oes\_nat.htm.](http://www.bls.gov/oes/current/oes_nat.htm)

To account for fringe benefits, the Agency used the Bureau of Labor Statistics’ (BLS) Occupational Employment Statistics (OES) (December 2023). Fringe markup is from the following BLS release: Employer Costs for Employee Compensation news release text; For release 10:00 AM (ET), Wednesday, March 13, 2024 (https://[www.bls.gov/news.release/ecec.nr0.htm,](http://www.bls.gov/news.release/ecec.nr0.htm) archived at https://[www.bls.gov/bls/news-](http://www.bls.gov/bls/news-) release/ecec.htm#current). BLS reported that for civilian workers, fringe benefits accounted for

31.1 percent of total compensation and wages accounted for the remaining 68.9 percent. To calculate the loaded hourly wage for each occupation, the Agency divided the mean hourly wage by 68.9 percent.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Table 1: Wage Hour Estimates** | | | | |
| **Occupational Title** | **SOC**  **Code** | **Mean Hour Wage Rate (A)** | **Wage Percent (B)** | **Loaded Hourly Wage Rate (C)=(A)/((1-(B))** |
| Occupational Safety & Health Specialist & Technician | 19-5011 | $41.14 | .311 | $59.71 |

## Event Registration

Estimated Annualized Respondent Cost and Hour Burden

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Activity | Number of Respondents | Number of Responses per Respondent | Total Number of Responses | Burden per Respondent (in Hours) | Total Burden Hours | Avg. Hourly Wage Rate | Total Burden Costs |
| Quarterly National Webinar Registration | 1,000 | 1 | 1,000 | 1/60 | 17 | $59.71 | $1,015 |
| Local Event Registration | 600 | 1 | 600 | 1/60 | 10 | $59.71 | $597 |
| Safe + Sound Week | 30,000 | 1 | 30,000 | 3/60 | 1,500 | $59.71 | $89,565 |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Pre- Registration |  |  |  |  |  |  |  |
| Totals | 31,600 |  | 31,600 |  | 1,527 |  | $91,177 |

OSHA’s Safe + Sound Campaign includes periodic activities and events, such as quarterly national webinars, local meetings, and an annual national stand down (i.e., Safe + Sound Week). The estimated number of respondents for the national webinar registration and the Safe + Sound Week pre-registration is based on the number of participants from events in 2023 and projections for 2024. The number of local event respondents is based on a projection for 2024 (2 local events with 30 participants in each of the 10 OSHA regions).

## Recruitment

Estimated Annualized Respondent Cost and Hour Burden

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Activity | Number of Respondents | Number of Responses per Respondent | Total Number of Responses | Burden per Respondent (in Hours) | Total Burden Hours (rounded) | Avg. Hourly Wage Rate | Total Burden Costs (rounded) |
| Recruitment and Outreach Phone Calls | 100 | 1 | 100 | 10/60 | 17 | $59.71 | 1,015 |

OSHA collaborates with outside stakeholders, including safety and health professional organizations, trade and industry associations, academic institutions, and state and federal government agencies to organize and promote Safe + Sound Campaign activities and events. To recruit new organizations to join the effort and encourage ongoing engagement, OSHA conducts outreach phone calls to ascertain interest in playing a role. OSHA estimates an Occupational Safety and Health Specialist and Technician will take 10 minutes (10/60 hour) to respond to OSHA’s outreach calls. The estimated number of respondents and the estimated burden hours is based on the number and duration of calls made to recruit and engage organizations since the 2017 Safe + Sound Week event.

## Event Customer Feedback

Estimated Annualized Respondent Cost and Hour Burden

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Activity | Number of Respondents | Number of Responses per Respondent | Total Number of Responses | Burden per Respondent (in Hours) | Total Burden Hours (rounded) | Avg. Hourly Wage Rate | Total Burden Costs (rounded) |
| National Webinar Feedback | 1,000 | 1 | 1,000 | 3/60 | 50 | $59.71 | $2,986 |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Local Event Feedback | 600 | 1 | 600 | 5/60 | 50 | $59.71 | $2,986 |
| Safe + Sound Week Feedback | 30,000 | 1 | 30,000 | 10/60 | 5,000 | $59.71 | $298,550 |
| Totals | 31,600 |  | 31,600 |  | 5,100 |  | $304,522 |

OSHA’s Safe + Sound Campaign includes periodic activities and events, such as quarterly national webinars, local meetings, and an annual national stand down (i.e., Safe + Sound Week). OSHA estimates an Occupational Safety and Health Specialist and Technician will take 3 minutes (3/60 hour) to provide feedback following a webinar, 5 minutes (5/60 hour) to provide feedback following a local event, and 10 minutes (10/60 hour) to provide feedback about their participation in Safe + Sound Week. The estimated number of respondents for the national webinar feedback and the Safe + Sound Week feedback is based on the number of participants from 2023 national webinars and 2023 Safe + Sound Week event. The number of local event respondents is based on a projection for 2024 (2 local events with 30 participants in each of the 10 OSHA regions). The estimated burden hours is based on the anticipated complexity of the feedback that will be requested, based on experience from the Safe + Sound Week customer satisfaction survey used in 2023.

## In-Depth Follow-Up and Case Study Interviews

Estimated Annualized Respondent Cost and Hour Burden

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Activity | Number of Respondents | Number of Responses per Respondent | Total Number of Responses | Burden Hours per Respondent (in Hours) | Total Burden Hours (rounded) | Avg. Hourly Wage Rate | Total Burden Costs (rounded) |
| Interviews | 50 | 1 | 50 | 20/60 | 17 | $59.71 | $1,015 |

OSHA intends to strengthen the Safe + Sound Campaign by highlighting event participants, especially those that host activities at their workplaces during the annual Safe + Sound Week, by developing case studies to share publicly on a variety of media platforms (e.g., websites, videos, emails, webinars, blogs, and newsletters). The estimated number of respondents and the estimated burden hours for the interviews is based on the number of participants and duration of interviews for those contacted following the 2022 Safe + Sound Week event.

## Focus Group Interviews

Estimated Annualized Respondent Cost and Hour Burden

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Activity | Number of Respondents | Number of Responses per Respondent | Total Number of Responses | Burden Hours per Respondent (in Hours) | Total Burden Hours | Avg. Hourly Wage Rate | Total Burden Costs (rounded) |

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| --- | --- | --- | --- | --- | --- | --- | --- |
| Interviews | 35 | 1 | 35 | 1 | 35 | $59.71 | $2,090 |

OSHA intends to strengthen the Safe + Sound Campaign by developing resources based on identified successes/challenges/outcomes to aid businesses in implementing safety and health programs in their workplaces. The estimated number of respondents and the estimated burden hours for the interviews is based on the number of participants and duration of interviews for those contacted following the 2022 Safe + Sound Week event.

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Table 2: Estimated Annualized Respondent Hour and Cost Burden Table** | | | | | | | | |
| **Information Collection Requirements** | **Type of Respondent** | **Number of**  **Respondents** | **Number of Responses per Respondent** | **Total Number of Responses** | **Average Burden per Response (In Hrs.)** | **Total Burden Hours** | **Avg. Hourly Wage Rate** | **Total Burden Costs (rounded)** |
| **1. Event Registration** |  |  |  |  |  |  |  |  |
| *National Webinar Registration* | Occupational Safety & Health Specialist & Technician | 1,000 | 1 | 1,000 | 1/60 | 17 | $59.71 | $1,015 |
| *Local Event Registration* | Occupational Safety & Health Specialist & Technician | 600 | 1 | 600 | 1/60 | 10 | $59.71 | $597 |
| *Safe + Sound Week Pre- Registration* | Occupational Safety & Health Specialist & Technician | 30,000 | 1 | 30,000 | 3/60 | 1,500 | $59.71 | $89,565 |
| Sub-Total |  | 31,600 |  | 31,600 |  | 1,527 |  | $91,177 |
| **2. Recruitment** |  |  |  |  |  |  |  |  |
| *Outreach Phone Calls* | Occupational Safety & Health Specialist & Technician | 100 | 1 | 100 | 10/60 | 17 | $59.71 | $1,015 |
| **3. Event** |  |  |  |  |  |  |  |  |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Customer Feedback** |  |  |  |  |  |  |  |  |
| *National Webinar Feedback* | Occupational Safety & Health Specialist & Technician | 1,000 | 1 | 1,000 | 3/60 | 50 | $59.71 | $2,986 |
| *Local Event Feedback* | Occupational Safety & Health Specialist & Technician | 600 | 1 | 600 | 5/60 | 50 | $59.71 | $2,986 |
| *Safe + Sound Week Feedback* | Occupational Safety & Health Specialist & Technician | 30,000 | 1 | 30,000 | 10/60 | 5,000 | $59.71 | $298,550 |
| Sub-Total |  | 31,600 |  | 31,600 |  | 5,100 |  | $304,522 |
| **4. In-Depth Follow-Up and Case Study Interviews** |  |  |  |  |  |  |  |  |
| *Interviews* | Occupational Safety & Health Specialist & Technician | 50 | 1 | 50 | 20/60 | 17 | $59.71 | $1,015 |
| **5. Focus Group Interviews** |  |  |  |  |  |  |  |  |
| *Interviews* | Occupational | 35 | 1 | 35 | 1 | 35 | 59.71 | $2,090 |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Safety & Health Specialist & Technician |  |  |  |  |  |  |  |
|  |  | **63,385** |  | **63,385** |  | **6,696** |  | **$399,819** |
| **Grand Total** |  | **--** |  | **190,155** |  | **20,088** |  | **--** |

This data collection is requesting 3-year generic clearance approval. Therefore, the annualized number of responses and burden hours will be tripled in ROCIS. This will ensure that the program will have the burden necessary to cover this data collection over the approved time period.

Total Number of Responses: 63,385 x 3 = 190,155 Total Number of Burden Hours 6,696 x 3 = 20,088

1. **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 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 or usual business or private practices.**

There are no additional capital or maintenance costs associated with this ICR.

## ​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 a single table.**

To determine the costs to the Federal Government, OSHA estimated how much time the government spends on each information collection activity and then totaled the burden hours and costs for all of the activities. For event registration, the Agency estimates that staff will take 3 minute per response (estimated 31,600 registrations for webinars, local events, and Safe + Sound Week) to compile the information submitted. For recruitment, the Agency estimates that staff will take 10 minutes per outreach phone call (100 calls estimated). For event customer feedback, the Agency estimates that staff will take 5 minutes per response (estimated 31,600 responses for feedback on webinars, local events, and Safe + Sound Week) to review and analyze the feedback received. For in-depth follow-up and case studies, the Agency estimates that staff will take 1 hour per respondent (50 respondents estimated) to prepare for and conduct the in-depth interview, as well as develop a case study summary for public dissemination. For focus groups, the Agency estimates that staff will take 1.5 hours per respondent (35 respondents estimated) to prepare for and conduct the focus group, as well as develop a case study summary or resources for public dissemination. For the annual summary report, the Agency estimates that staff will take 80 hours to compile a document based on results from all Safe + Sound Week activities.

These estimates are based on experience from 2017-2023 Campaign activities. OSHA estimates 4,412.83 hours are spent by the Federal government on the collection of information activities for the Safe + Sound Campaign.

For each collection, several government employees at differing grades may be involved in processing, analyzing, preparing reports, and developing case studies. The Agency determined that a GS-13, step 10F ($56.52) represents the average wage rate for the government staff working on these collections of information requirements.

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The total annualized cost to the Federal government is $249,414.

Federal government cost over the next 3 years is $249,414 = $748,242.

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| --- | --- | --- | --- | --- | --- | --- |
| **Table 3- Estimated Annualized Costs to the Federal Government** | | | | | | |
| Activity | Government Action | Number of Responses | Time per Response In Hours | Total Gov’t Hours | Avg. Hourly Wage Rate | Total  Gov’t Costs (rounded) |
| 1. Event  Registration | Compile event registrations submitted | 31,600 | 3/60 | 1,580 | $56.52 | $89,302 |
| 2. Recruitment | Outreach phone calls | 100 | 10/60 | 17 | $56.52 | $961 |

1[https://www.opm.gov/policy-data-oversight/pay-leave/salaries-](http://www.opm.gov/policy-data-oversight/pay-leave/salaries-)

wages/2024/general-schedule

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| 3. Event  Customer Feedback | Review and analyze feedback received | 31,600 | 5/60 | 2,633.33 | $56.52 | $148,836 |
| 4. In-Depth Follow-Up and Case Study Interviews | Conduct interviews and develop case studies | 50 | 1 | 50 | $56.52 | $2,826 |
| 5. Focus Group Interviews | Conduct interviews and analyze results | 35 | 1.5 | 52.5 | $56.52 | $2,967 |
| 6. Annual  Summary Report | Compile report based on results from all Safe + Sound Week activities | N/A | N/A | 80 | $56.52 | $4,522 |
| Totals |  |  |  | 4,412.83 |  | $249,414 |

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

The Agency is requesting a total increase in burden hours over 3 years (from 2,535 hours to 20,088 hours) for this revision request. An increase of 17,553 hours. The program changes are due to an anticipated significant increase in the number of participants of over 20,000+ . Including slight modifications to the registration and feedback forms. The remaining forms will be unchanged.

## 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.

OSHA intends to publish an annual summary report of all Safe + Sound Campaign activities during the fiscal year. The Agency will publish the report during the first quarter of the subsequent fiscal year. For example, FY 2024 Safe + Sound Campaign summary results will be compiled and published in a report during the first quarter of FY 2025. No attempt will be made to generalize the responses received to larger populations.

The report will include: Summary statistics

* + Number of events
  + Total number of participants
  + Participation by: state/region, industry/sector, business size

Event information by type:

* + Webinars (number of participants, number of events, satisfaction with events, suggestions for improvements, participation by: state/region, industry/sector, business size)
  + Local Events (number of participants, number of events, satisfaction with events, suggestions for improvements, participation by: state/region, industry/sector, business size)
  + Safe + Sound Week (number of participants, number of events, satisfaction with events, suggestions for improvements, participation by: state/region, industry/sector, business size)

Examples of what participants did for Safe + Sound Week (sample of interesting/innovative Safe

+ Sound Week event activity)

Examples of outcomes from engagement from Partners and Participants

## 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 will be displayed.

## Explain each exception to the certification statement.

In the case of this collection, no such exceptions exist.

## B. COLLECTIONS OF INFORMATON EMPLOYING STATISTICAL METHODS.

This collection of information does not employ statistical methods.