**SUPPORTING STATEMENT FOR THE
THE VOLUNTARY PROTECTION PROGRAMS (VPP)
OFFICE OF MANAGEMENT AND BUDGET (OMB)
CONTROL NO. 1218-0239 (July 2024)**

This is a request to extend 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.

The Occupational Safety and Health Administration's (OSHA) mission is to prevent work-related injuries, illnesses, and deaths. OSHA's primary means of accomplishing this mission is the promulgation and enforcement of occupational safety and health standards. However, OSHA recognizes that it cannot accomplish its mission solely through the enforcement of such standards and employs other strategies to accomplish its mission. One of these strategies is encouraging employers to implement comprehensive safety and health management programs. OSHA's Voluntary Protection Programs (VPP), a partnership between labor, management, and government, is designed to recognize and promote excellence in safety and health management. Traditionally, OSHA only offered VPP recognition to fixed worksites.

In 2004, OSHA introduced the VPP Corporate and OSHA Challenge as pilot programs, and in 2006, OSHA introduced the Mobile Workforce for Construction pilot program. The VPP Corporate pilot program provided corporations committed to VPP and interested in achieving VPP recognition at facilities throughout their organization with more efficient means to accomplish this goal. The Mobile Workforce for Construction pilot was designed to reach out to smaller employers such as those engaged in specialty contracting where current VPP policies excluded employers who did not have authority for safety and health for the entire worksite. The OSHA Challenge pilot program provides a greater opportunity to eligible employers interested in working with OSHA to create safer and healthier workplaces for their employees.

In 2009, OSHA formalized two of the pilots – Mobile Workforce for Construction and VPP Corporate with the publication of the Revisions to the VPP to Provide Safe and Healthful Working Conditions Federal Register Notice (FRN). OSHA added to its traditional focus on individual VPP fixed worksites (site-based) by adding two new ways to participate: VPP Mobile Workforce and VPP Corporate. These revisions to the FRN clarified the multiple participation options now available within VPP. OSHA Challenge remains a cooperative program.

Participation in VPP is strictly voluntary and does not diminish existing employer and employee rights and responsibilities under the Occupational Safety and Health Act (OSH Act).

In particular, OSHA does not intend to increase the liability of any party in an approved VPP site. Employees or any representatives of employees taking part in an OSHA-approved VPP safety and health management program are not assuming the employer's statutory or common law responsibilities for providing safe and healthful workplaces or undertaking in any way to guarantee a safe and healthful work environment.

To participate in the VPP, OSHA requires an applicant to submit an application and an annual self-evaluation containing a detailed description of its safety and health management programs. OSHA needs this information to conduct a preliminary analysis of the worksite's programs, and to make a preliminary determination regarding the worksite's qualifications for VPP. Lacking this information, OSHA would consume thousands of person-hours conducting onsite evaluations at worksites that are not ready to qualify for the VPP.

To be recognized as a VPP worksite, applicants must adhere to the VPP programmatic requirements. VPP Star has the most prestigious recognition and rigorous requirements; only sites with the most exemplary safety and health management programs achieve Star status. VPP Merit sites, meanwhile, have good safety and health management programs but must take additional steps to reach VPP Star status. OSHA is currently examining the practical utility of the Merit program. The Federal Register Notice that established VPP as a program (47 FR 29025, July 2, 1982) provided the benefit that VPP worksites be removed from OSHA's general schedule programmed inspection list. All VPP worksites are removed from programmed inspection lists for the duration of their participation. Un-programmed inspections occur at VPP worksites in response to all referrals, formal complaints, fatalities, and catastrophes.

Site-Based

The Site-based way to participate continues VPP's traditional acceptance of applications from fixed worksites and some long-term construction sites. Within site-based VPP participation, OSHA accepts VPP applications from the owners and site officials who control site operations and have ultimate responsibility for assuring safe and healthful working conditions of Private-sector fixed worksites in general industry and the maritime industry; Construction worksites/ projects that will have been in operation for at least 12 months at projected time of approval and that expect to continue in operation for at least an additional 12 months; Federal-sector fixed worksites, and certain resident contractors.

VPP Corporate

The VPP Corporate way to participate is intended for corporations who are committed to achieving VPP approval for multiple specified individual sites within their organization. The corporation must utilize well-established, standardized safety and health management programs at all participating sites, employ a prescreening process to ensure that their sites have effectively implemented the programs, addressed site-specific hazards, and satisfied the VPP requirements. Organizations that achieve VPP Corporate status can utilize streamlined application and onsite evaluation processes to bring into VPP individual sites.

OSHA is revising the VPP Corporate policy and a new pilot program for VPP Corporate is being developed and will be added upon agency approval.

Over the past few years, interest in the VPP Corporate program has dwindled. OSHA is reviewing its practical utility.

Mobile Workforce

The Mobile Workforce way to participate is intended to create greater opportunities for employers and employees in industries that did not qualify for the traditional VPP site-based way to participate. Mobile workforce participation is intended for 1) applicants/participants whose employees move physically from one work project to another and 2) applicants/participants whose employees work as resident contractors at two or more fixed locations.

OSHA Challenge

OSHA Challenge is designed to reach and guide employers and companies in all major industry groups that are strongly committed to improving their safety and health management programs and possibly pursuing recognition in the VPP. It provides participants with a guide or roadmap to improve their performance in managing safety and health at their worksites. Over the past few years, interest in OSHA Challenge has begun to dwindle. In 2020, OSHA established a working group to review the practical utility of this program.

Special Government Employee (SGE) Program

The Special Government Employee (SGE) Program supports the VPP. It provides the opportunity for safety and health professionals employed at approved VPP sites to assist and participate with OSHA on VPP onsite evaluations. Prior to participating on an onsite evaluation, the eligible SGE must apply to and receive from OSHA the formal SGE training class. Upon completing the training course, the SGE may volunteer to participate on a VPP onsite evaluation team.

In 2014, Challenge Administrators deemed the use of Challenge Coordinators assistance unnecessary in managing Challenge participants; therefore, there is no longer a need for Challenge Coordinators' applications.

In 2015, OSHA modified the SGE policies & procedures for SGE applicants who wish to extend their three-year initial term or renew their term as an SGE to indicate on the SGE Eligibility Information Sheet a minimum of three (3) qualifying activities they were involved in during their previous three-year term of service.

In 2008, OSHA modified the VPP procedures for all applicants/participants subject to OSHA standards 29 CFR 1910.119 and 1926.64 (Process Safety Management (PSM)). The standards

cover all employers using or producing highly hazardous chemicals exceeding specified limits. The procedural modifications affected the applications, onsite evaluations, and annual participant self-evaluations process for these applicants/participants.

In 2020, OSHA placed the VPP Corporate way to participate on hold see (CSP 03-01-005, dated 1/30/2020).

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.**

OSHA's Regional Office personnel use the initial VPP application to 1) conduct a preliminary analysis of the applicant's safety and health management programs and 2) make a preliminary determination regarding the applicant's qualifications for VPP. Once accepted, the VPP onsite evaluation team, prior to conducting a VPP onsite evaluation, reviews the application. If the applicant is approved for participation, federal personnel and SGEs will use the application and subsequent annual evaluations to 1) justify continued participation in the program, 2) evaluate program performance, and 3) as models of effective safety and health management.

VPP Corporate

OSHA's Regional and National Office personnel use the initial VPP Corporate application to: 1) conduct a preliminary analysis of the applicant's safety and health management programs, and 2) make a preliminary determination regarding the applicant's qualifications for participation. If the corporation is approved for participation, federal personnel use the application and subsequent annual evaluations to justify continued participation in the program and evaluate program performance.

OSHA Challenge

OSHA National Office personnel use the initial A Challenge administrator application will indicate that the administrator knows safety and health management systems and the resources to review Challenge candidates' applications whereas a Challenge candidate's application indicates that they need to develop a safety and management system to reduce injuries illnesses at their worksites. Challenge Administrators application: 1) conduct a preliminary analysis of the applicant's knowledge of safety and health management programs; and 2) make a determination regarding the applicant's qualifications to become a Challenge Administrator. Once a Challenge Administrator is approved, the Administrator will review each challenge participant's application/annual submissions to ensure that all necessary information is provided prior to forwarding it to OSHA's National Office for acceptance and analysis.

An OSHA Challenge Candidate is an employer that has elected to submit a Challenge application to a Challenge Administrator for submission to OSHA. After the Challenge administrator approves the Challenge candidate application OSHA's Directorate of Cooperative and State Programs reviews and approves Candidate packages; upon vetting by

the Region where the candidate is located. The employer remains a candidate until receiving notification from OSHA that it has been accepted into OSHA Challenge as a participant.

The Administrators submit annual reports to OSHA on the progress made by their sponsored participants. The annual reports must contain, at minimum, a summary of annual rates by participant, a summary of hazards identified and corrected by participant, and a summary of leading indicators by participant.

SGE Program

OSHA's National Office personnel use the information submitted by the SGE applicants to ensure that individuals are qualified to serve, arrange for participation at VPP onsite evaluations, and inform participants of their status in the program. Specifically, the resume or USAJOBS Resume 3.0 under OMB Control Number 3206-0219 Expiration Date 6/30/2024. the Optional Application for Federal Employment (OF 612) is used to ensure that the SGE applicant meets specific conditions and requirements, and OMB Control Number 3209-0006 the Confidential Financial Disclosure Report (OGE Form 450) Expiration Date 11/30/24 is used to ensure that SGEs do not participate on onsite evaluations at worksites where there might be a conflict of interest.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques, or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adapting this means of collection. Also, describe any consideration of using information technology to reduce burden.

OSHA welcomes the electronic submission of VPP documents where such technology is available. Some VPP documents require signatures and must be submitted in hard copy until electronic signature (e-signature) is available throughout the Department and/or Agency systems.

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 VPP application and annual self-evaluation are applicant/participant-specific and are not requested or collected by OSHA in any other circumstances. When OSHA regulations require employers to maintain written programs, this information may be used to satisfy VPP application requirements. The SGE application is applicant-specific and is not requested or collected by OSHA under any other circumstances.

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

Small businesses (i.e., 250 or fewer employees onsite and 500 or fewer employees corporate-wide) account for approximately 4.3% of current VPP participants. Although small businesses comprise a relatively small proportion of VPP participants, OSHA is concerned with minimizing their paperwork burden. To that end, OSHA only requires that applicants demonstrate the presence of comprehensive safety and health management programs commensurate with their occupational hazardous exposures. Because small businesses typically have a smaller spectrum of hazardous exposures and fewer levels of management, the amount of documentation required to demonstrate comprehensive safety and health management programs is less than for larger companies. This translates into a smaller paperwork burden for small businesses.

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

Not allowing OSHA to collect the information required in VPP applications and annual evaluations for these programs would eliminate the Agency's ability to accept new participants into the VPP or re-certify current VPP participants for continued participation. This action would deprive VPP participants of the benefits associated with program participation. Forcing OSHA to collect the information less frequently would limit the Agency's ability to ensure that participants' sites maintain superior safety and health management programs.

Similarly, not allowing OSHA to collect SGE application information would eliminate the Agency's ability to accept new individuals into the program or to reapprove current SGE participants for a new term of service. Requiring OSHA to collect SGE application information less frequently would limit the Agency's ability to maintain current and accurate information on SGEs and result in a less effective program. Because SGEs are critical for maintaining VPP's success, a less effective program would deprive OSHA of valuable resources and services provided by the SGEs, limit VPP growth, deny potential and current VPP participants their valuable expertise, and deny individuals the prestige associated with being an SGE.

Not allowing OSHA to collect information required for OSHA Challenge would hinder the Agency's ability to work with employers committed to improving their safety and health management 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 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.**

No special circumstances exist that require employers to collect information in the manner or using the procedures specified by this item.

8A. 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.

Pursuant to the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the Federal Register on April 24, 2024, (89 FR 31221) OSHA Docket No -2011-0056. soliciting comments on its proposal to extend the Office of Management and Budget's (OMB) approval of the information collection requirements specified by the Voluntary

Protection Programs. This notice was a part of a preclearance consultation program that provides the general public and government agencies with an opportunity to comment. The agency did not receive any public comments in response to this notice.

8B. 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.

The affected respondents can provide feedback to the program on an as needed basis. Past form modification/clarification were based on respondent feedback. The VPP is acknowledged under OMB A-11 as a High Impact Service Program (HISP) and regularly utilizes a special DOL generic clearance to gauge the customer experience as needed.

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

The Agency will not provide payments or gifts to the respondents.

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

Respondents are assured of the confidentiality of their VPP application until it is approved. Confidentiality requirements are outlined in the VPP FRN, the VPP Policies and Procedures Manual, and the SGE Policies and Procedures Manual.

Participants applying for the VPP understand that, if approved to participate into these programs, their application becomes part of the public record. SGEs understand that, if approved for the program, they will be considered active SGEs and may be requested to participate in VPP onsite evaluations. Information collected in the application concerning financial disclosures remains confidential and is not available to the public.

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 information collection requirements do not involve the collection of 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 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-Hour and Cost Determinations

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 Wage Statistics (OEWS), May 2022 accessed: March 6, 2024. (OEWS data is available at List of SOC Occupations (bls.gov). To access a wage rate, select the year, "Occupation profiles," and the Standard Occupational Classification (SOC) code.)

To account for fringe benefits, the agency used the *Occupational Employment Wage Statistics (OEWS)*. Fringe markup is from the following BLS release: *Employer Costs for Employee Compensation* news release text; For release, December 15, 2023.*https://www.bls.gov/news.release/pdf/ecec.pdf*. BLS reported that for private industry workers, fringe benefits accounted for 29.4 percent of total compensation, and wages accounted for the remaining 70.6 percent.

Table 1 – WAGE HOUR ESTIMATE				
Occupational Title	**SOC Code**	**Mean Hourly Wage Rate (A)**	**Fringe Benefits (B)[1]**	**Loaded Hourly Wage Rate = (A)/(1-(B)**
First Line Supervisor/ Production Worker	51-1011	$33.22	29.4%	$47.07

OMB Control Number 3206-0219 for the Optional Application for Federal Employment 0F-612 is still valid.

OMB Control Number 3209-0006 for Confidential Financial Disclosure Report OGE Form 450 is still valid.

The following table summarizes the burden hours and costs associated with each provision of the Regulation that contains a paperwork requirement:

[1] No construction worker's time is taken to develop and post signs for §1926.800(b)(3) and (q)(11) since specific language is provided in the regulatory text.

Table 2: Estimated Annualized Respondent Cost and Hour Burden								
Information Collection Requirement(s)	**Type of Respondent**	**No. of Respondents***	**No. of Responses per Respondent**	**Total No. of Responses**	**Burden per Response (in Hours)**	**Total Burden Hours (rounded)**	**Loaded Hourly Wage Rate**	**Total Burden Costs (rounded)**
VPP								
VPP Application Types: Site Based Mobile Workforce Corporate	New Applicants for FY18 (21) FY19, (22) and FY20 (23) for a 3-year period	170	1	170	200	34,000	$47.05	$1,559,700
VPP Application Supplemental/PSM Question–aire - A	25% of 170 VPP Applications	42	1	42	40	1,680	$47.05	$79,044
PSM Evaluation/Supplemental Question–aire - B	25% of (1125) VPP Participants	281	(1.562)	439	20	8,780	$47.05	$413,099
VPP Annual Self-Evaluation	(1148) @ beginning of FY24	1148	1	1,148	20	22,960	$47.05	$1,080,268
Subtotal	--	--	--	**1,799**	--	**67,420**	--	**$3,132,111**
Special Government Employees (SGE)								
General Eligibility Information Sheet	Average for 3-year FY21, FY 22, and FY 23	450	0.33 (1 every 3 years)	149	10/60	25	$47.05	$1,176
Resume	75% of Applicants submit resumes	338	0.33 (1 every 3 years)	112	30/60	56	$47.05	$2,635
Optional Application for Federal Employment OF-612	25% of Applicants submit the OF-	113	.23 0.33 (1 every 3	26	40/60	17	$47.05	$800

Table 2: Estimated Annualized Respondent Cost and Hour Burden								
Information Collection Requirement(s)	**Type of Respondent**	**No. of Respondents***	**No. of Responses per Respondent**	**Total No. of Responses**	**Burden per Response (in Hours)**	**Total Burden Hours (rounded)**	**Loaded Hourly Wage Rate**	**Total Burden Costs (rounded)**
	612		years)					
Confidential Financial Disclosure Form (OGE Form 450)	100% of SGE applicants submit the OGE Form 450	1,149	1	1,149	1	1,149	$47.05	$54,060
Subtotal	--	--	--	**1,436**	--	**1,247**	--	**$58,671**
OSHA CHALLENGE								
Challenge Administrators Application	100% of respondents applying to become Administrators submit an application	6	1	6	5	30	$47.05	$1,412
Challenge Participant/Candidate Application	100% of Challenge Candidates submit an application	12	1	12	10	120	$47.05	$5,646
Administrators Annual Summary Report	Administrators submit a report on 100% of participants	42	1	42	20	840	$47.05	$39,522
Subtotal	--	--	--	**60**	--	**990**	--	**$46,580**
GRAND TOTAL	--	--	--	**3,295**	--	**69,657**	--	**$3,237,362**

The number of respondents is 3,295.

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.**

The cost determined under Item 12 accounts for the total annual cost burden to respondents or record keepers resulting from these collections of information requirements.

14. Provide estimates of 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 in a single table.

The information collection estimates contained in the table below are based on programmatic expertise and experience of Federal personnel in Washington, DC National Office, an average

cost estimate of $65.94 per hour of government personnel time (GS-13, Step 6) from salary table 2024-GS. Pay & Leave : Salaries & Wages - OPM.gov

Table 3: Effects of VPP Information Collection on the Federal Government							
Information Collection Requirement(s)	**Estimated Number of Respondents (3-year Average)**	**Frequency of Response**	**Number of Responses**	**Estimated Review Time per Document for Federal Employee**	**Estimated Annual Review Time for Federal Employee**	**Hourly Wage Rate GS-13, Step 6**	**Estimated Annual Cost**
VPP							
VPP Application Types: Site Based Mobile Workforce Corporate	170	1 per year	170	5 hours (GS-13, Step 6)	850	$65.94	$56,049
VPP Application Supplemental/PSM Questionnaire – A	34 (25% of VPP Applications)	1 per year	42	4 hours (GS-13, Step 6)	168	$65.94	$11,078
PSM Evaluation/Supplemental Questionnaire – B	439 (25% of 1125 VPP Participants)	1 per year	281	2 hours (GS-13, Step 6)	562	$65.94	$37,058
VPP Participation Evaluation Report: Site Based Mobile Workforce Corporate	170	1 per year	170	24 hours (6 hours for each member of a team of 4) (GS-13, Step 6)	4,080	$65.94	$269,035
VPP Annual Self-Evaluation	(1148 @ beginning of FY24	1 per year	1148	2 hours (GS-13, Step 6)	2,296	$65.94	$151,398
Subtotal	--	--	**1,811**	--	**7,956**	--	**$524,618**
Special Government Employees (SGE)							
General Eligibility Information Sheet	450	0.33 (1 every 3 years)	149	10/60 (GS-13, Step 6)	25	$65.94	$1,649
Resume	338	0.33	254	10/60	42	$65.94	$2,769

Table 3: Effects of VPP Information Collection on the Federal Government							
Information Collection Requirement(s)	**Estimated Number of Respondents (3-year Average)**	**Frequency of Response**	**Number of Responses**	**Estimated Review Time per Document for Federal Employee**	**Estimated Annual Review Time for Federal Employee**	**Hourly Wage Rate GS-13, Step 6**	**Estimated Annual Cost**
	(75% of Applicants submit resumes)	(1 every 3 years)		(GS-13, Step 6)			
Optional Application for Federal Employment OF-612	113 (25% of Applicants submits the OF-612)	0.33 (1 every 3 years)	37	10/60 (GS-13, Step 6)	6	$65.94	$396
Confidential Financial Disclosure Form (OGE For 450)	1149	1 per year	1149	10/60 (GS-13, Step 6)	192	$65.94	$12,660
Subtotal	--	--	**1,589**	--	**265**	$65.94	**$17,474**
OSHA Challenge Program							
Challenge Administrators Application	6	1 per year	6	5 hours (GS-13, Step 6)	30	$65.94	$1,978
Challenge Candidate Application	12	1 per year	12	10 hour (GS-13, Step 6)	120	$65.94	$7,913
Administrators Annual Summary Report	~~2~~ 42	1 per year	42	20 (GS-13, Step 6)	840	$65.94	$55,390
Subtotal	--	--	**60**	--	**990**	--	**$65,281**
Grand Total	--	--	**3,460**	--	**9,211**	--	**$607,373**

Total Cost for federal personnel is $607,373.

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

OSHA is requesting an adjustment decrease of 20,843 burden hours from 90,500 to 69,657 hours. The decrease is primarily due to the lack of VPP Challenge participation, the lack of training of new SGE applicants, and the lack of re-approval training of existing SGEs. The lingering effects of the COVID-19 Pandemic affected all OSHA Cooperative Programs.

16. For collections of information whose results will be published, outline plans for tabulation 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 will not publish the information collected under this request.

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 lists current valid control numbers in §§1910.8, 1915.8, 1917.4, 1918.4, and 1926.5 and publishes the expiration date in the Federal Register notice announcing OMB approval of the information collection requirement (See 5 CFR 1320.3(f)(3)). OSHA believes that this is the most appropriate and accurate mechanism for informing interested parties of these expiration dates.

18. Explain each exception to the certification statement.

OSHA is not seeking such an exception to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This Supporting Statement does not contain any collection of information requirements that employ statistical methods.