

**SUPPORTING STATEMENT FOR
Department of Labor Generic Clearance for Outreach Activities**

OMB Control Number: 1225-0059

This request seeks to extend the currently approved Information Collection Request (ICR) contained in OMB Control No. 1225-0059.

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 Department of Labor (DOL) needs to collect information from the public that help assess Departmental policies, products, and services and lead to improvements in other similar areas. This information collection is designed to collect qualitative customer and stakeholder feedback in an efficient, timely manner.

DOL staff defines qualitative feedback as information that provides useful insights on perceptions and opinions, but does not use statistical surveys that yield quantitative (i.e. numerical) results that can be generalized to the population of study. DOL intends this sort of feedback to:

- provide insights into customer or stakeholder perceptions,
- provide insights into customer experiences and expectations,
- provide insights into emerging issues or interest to DOL,
- provide attention on areas where communication, training, or changes in operations might improve delivery of products or services.

These collections will allow for actionable, collaborative, and ongoing communications between DOL and its stakeholders. The collected data will also allow feedback to contribute directly to the improved internal program management. Specifically, these evaluation information collections/forms will be used by DOL subagencies who host occasional user conferences or other outreach venues to inform their Federal and non-Federal attendees. These data collections are a valuable tool for determining the usefulness of conferences, for increasing the utility of future conferences, and in providing the highest quality services to DOL stakeholders.

The following considerations will be made for all information collections associated with this ICR:

- Responses are voluntary;

- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and is low-cost for both the respondents and the Federal Government;
- The collection is targeted to the solicitation of opinions from respondents who have experience with the program or issues under consideration;
- Information gathered will yield qualitative information; the collection will not be designed or be expected to yield statistically reliable results or be used as though the results are generalizable to the population of study;
- Collect customers' opinions of what they want and their satisfaction with what they are getting;
- Provide credible confidentiality (if applicable);
- Collect information that customers perceive as innocuous and of potential benefit to them (e.g., improved products/services); Collect "actionable" items (items that can be changed within existing constraints)
- Collect "actionable" items (items that can be changed within existing constraints).

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

The information collections will be designed to support DOL core mission toward serving its most important stakeholder, namely each and every interested American citizen. They will cover a wide range of agency responsibilities including, but not limited to:

- pension programs,
- occupational safety and health programs,
- mine safety and health programs,
- veterans' programs,
- employment and training programs,
- statistical programs, and
- labor management standards.

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.

Innovative information technologies will be implemented wherever possible in the execution of customer satisfaction surveys. Every possible effort will be considered to streamline each survey to minimize both the burden imposed upon the respondent and the Federal employee using and interpreting the collected data.

Since myriad DOL subagencies provide different services, a single generic questionnaire could be unduly burdensome to the public and would lack the degree of specificity needed to be even minimally useful.

These voluntary questionnaires/evaluations will gather information from DOL stakeholders and interested parties on subjects such as:

- the users' accessibility to the service;
- the value the service has provided;
- the quality and timeliness of the response/conference;
- the demeanor of the agency representative that helped the user;
- any additional questions or comments the respondent might have for the improvement of the service; and
- other undetermined customer satisfaction issues..

The respondent may be asked to perform the following activities:

- For telephone and or face-to-face questionnaires
 - Listen to instructions;
 - Provide oral responses
- For written questionnaires
 - Read instructions
 - Provide written responses
 - Return mail questionnaires
- Focus groups
 - Listen to an introduction and guidelines
 - Participate in discussions
 - Usability testing
- Bulletin boards
 - Read bulletin board notice
 - Provide appropriate response
- Internet surveys
 - Read instructions
 - Using an interactive web-based tools
 - Provide written responses
- Conferences
 - Read or listen to instructions
 - Provide written responses

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.

Instruments will be designed to avoid duplication existing information. Each instrument will be assessed in accordance with DLMS 1-300 procedures to ensure that there is no duplication or overlap with other departmental programs. The data obtained from each instrument will be unique. Each instrument will be tailored to a specific audience with questions relevant to the performance of the subject program, locality, conference topic, etc.

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

While collections of information conducted under this generic clearance will not impose a significant impact on small entities, DOL plans to minimize the burden in the following ways:

- allowing respondents to provide information in a format convenient to them where possible, and
- limiting the information requested to the least necessary while not compromising quality.

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.

Information collected will be used in a variety of ways, including the improvement of product delivery and services. In the absence of these services, DOL will be unable to meet the requirements of Executive Order 13571 (Streamlining Service Delivery and Improving Customer Service)¹.

DOL anticipates individual respondents will provide information once with no recurring reporting requirement. Thus, these information collections cannot be conducted less frequently while providing the same support of DOL's various missions.

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;**

¹ [Executive Order 13571](#)

- **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.**

Each information collection will be conducted in a manner consistent with 5 CFR 1320.5. Individual justification will be provided to OMB on a case-by-case basis as part of the Supplemental Supporting Statement if an information collection deviates from that regulation.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with OIRA regulations², DOL published a 60-day Federal Register notice (FRN), on September 11, 2023 (88 FR 62401) soliciting comments from the public and interested parties regarding the extension of OMB Control No. 1225-0059. DOL received no comments in response to that FRN.

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

DOL will not provide any payment of gifts to respondents.

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

² 5 CFR 1320.8(d)

Any individuals and organizations contacted by DOL will be assured of the confidentiality of their replies under Freedom of Information Act³, Privacy Act of 1974⁴, and OMB Circular No. A-130⁵.

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.

DOL will not collection sensitive data under OMB Control No. 1225-0059.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The annual time burden requested (80,000 hours) is based on the number of collections the DOL expects to conduct over the requested period for this clearance.

The DOL bases the following burden estimates on the Departmental experience with the program during the previous clearance period. Based on available data, DOL estimates an average response burden of about 6 minutes per response (0.1 hours). To ensure an appropriate

³ 42 USC 1306, 20 CFR Parts 401 and 422

⁴ 5 USC 552a

⁵ [OMB Circular A-130](#)

level of responses and hours are available for collections approved under this package; DOL estimates 800,000 responses/year and 80,000 hours total burden hours.

Estimated Annualized Respondent Cost and Hour Burden

No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate ⁶	Total Burden Cost
800,000	1	800,000	0.1	80,000	\$34.10	\$2,728,000

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3)**

⁶ Respondents to instruments cleared under this ICR will come from a variety of backgrounds from students or the currently unemployed to highly paid professionals and managerial staff to business owners. DOL utilizes the average hourly earnings of all employees on private payrolls for 2023(<https://www.bls.gov/charts/employment-situation/employment-and-average-hourly-earnings-by-industry-bubble.htm>). The hourly wage as computed by the Bureau of Labor Statistics, of \$34.10.

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 start-up or annual operation and maintenance costs incurred by respondents.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

There are no federal costs associated with these information collection activities.

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

DOL is not changing either reporting requirements or the burden estimate for OMB Control No. 1225-0059.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

DOL will disseminate the results obtained from these various surveys to key policy and management officials, DOL employees, stakeholders, and the public, if applicable. Raw data may be reported with the understanding that analysis will be limited to individuals who responded to the collection.

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.

Most collections conducted under this generic clearance are one-time surveys. DOL is requesting an exemption from the requirement to display the expiration date on one-time instruments under this information collection.

18. Explain each exception to the certification statement.

DOL is not requesting an exception to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.