

**SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS IN
THE OSHA STRATEGIC PARTNERSHIP PROGRAM (OSPP)
FOR WORKER SAFETY AND HEALTH OFFICE OF MANAGEMENT AND BUDGET
(OMB) CONTROL NO. 1218-0244 (May 2025)**

The agency is seeking an extension of 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.**

Over the past several years, the Occupational Safety and Health Administration (OSHA) has expanded on its already substantial experience with voluntary programs by proposing and implementing various new cooperative initiatives in the National, Regional, and Area Offices. These efforts are designed to increase OSHA's impact on worker safety and health while minimizing the use of OSHA's resources. At the same time, these cooperative approaches allow willing employers and workers to initiate a working relationship with OSHA that is outside the scope of enforcement.

In 1998, the agency initiated the OSHA Strategic Partnership Program (OSPP) for Worker Safety and Health. The program allows OSHA to enter an extended, voluntary, cooperative relationship with groups of employers, workers, and worker representatives (sometimes including other stakeholders, and sometimes involving only one employer) to encourage, assist, and recognize their efforts to eliminate serious hazards and achieve a high level of worker safety and health. An OSHA Strategic Partnership (OSP) aims to have a measurable, positive impact on workplace safety and health that goes beyond what historically has been achieved through traditional enforcement methods. Additionally, OSPs allow OSHA to impact multiple worksites, which help leverage the agency's resources.

OSHA Instruction CSP 03-02-002¹, provides policies and procedures for the OSPP. The agency uses this information to evaluate the effectiveness of its programs, identify needed improvements, and ensure that resources are being used to maximum effectiveness. During the development stage of each OSP, the partners determine what information will be needed. This process involves identifying the needed information, determining the best collection method, and clarifying how the information will be used. Because participating private sector employers have strong input regarding information collection, OSHA is confident that data collection efforts are prudent and do not burden the partners.

¹To view the directive, go to [OSHA Strategic Partnership Program for Worker Safety and Health](#)

At a minimum, each OSP must identify baseline illness and injury data corresponding to all summary line items on the OSHA 300 log. Then, they must track changes at either the worksite level or at the participant-aggregate level. No other specific measures are universally required for all OSPs. An OSP may also include other measures of success, such as training activity, self-inspections, and/or workers' compensation data. OSHA's experience with its Voluntary Protection Programs, Consultation Program, and various enforcement activities has shown that all of these measures can be useful in evaluating the effectiveness of safety and health management systems and other worker protection measures.

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.

Information is collected directly by the partners, by a third party associated with the partnership, or sometimes directly by OSHA (e.g., during on-site verification visits). OSHA and its partners use the information to evaluate the partnership's impact in terms of improvements to baseline measures, the number of sites and workers affected, and other successes. OSHA also uses this information to assess the agency's progress in meeting strategic plan goals and strategies.

Since its inception in 1994, over 2,567,567 workers and 33,805 employers have participated in the program. Partnerships address the most serious workplace safety and health issues and strive to reduce fatalities, injuries, and illnesses in a myriad of industries.

There are many successes achieved by participating employers resulting from information collected about their OSHA Strategic Partnerships. OSHA can demonstrate, in many instances that the numbers of fatal accidents and occupational injury and illness rates for employers have been reduced to levels below those of the Bureau of Labor Statistics for the employers' industries. Achieving excellence in occupational safety and health is a key goal for all active partnerships. Data other than injury and illness rates are collected for the partnerships, further demonstrating the commitment of partnering employers to the safety and health of their workers and their industries. Types of additional data collected include the number of hours of safety-related training provided to workers, the numbers and results of site audits and verification visits conducted at partnering sites, and the number of hazardous conditions identified at a partners' sites and measures taken by those sites to correct the identified hazardous conditions.

OSHA's ability to gather this information allows the agency to assess and promote the OSPP. More importantly, the success experienced by these OSPs, when shared, can serve as a model to improve worker safety and health.

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 adapting this means of collection. Also, describe any consideration of using information technology to reduce burdens.

Partnership participants may use improved information technology whenever appropriate when making, keeping, and preserving the required records. OSHA is only interested in what is collected, not how it is collected. OSHA welcomes the use of information technology to submit the information to reduce the burden. However, OSHA does not require the use of this technology for reporting.

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.

Each partnership is unique, and the information needed is available only from that partnership. OSHA generally requires existing data found in the OSHA 300 Log or information required by current OSHA standards and regulations. As a partnership is established, the participants will identify additional data that they determine are needed to assess the effectiveness of the OSP.

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

Members of each partnership determine what information collection is required to measure its success or failure. Including employers and workers in this process helps minimize the information collection burden. The only OSHA-required burden on small businesses is the reporting of OSHA 300 Log data.

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

The information collection frequency (on average once initially and again annually) is minimal. To eliminate or reduce the submission requirements would effectively cripple OSHA's ability to measure success as required by the Government Performance Results Act and OSHA's Operating Plan. There are no technical or legal obstacles to reduce the burden.

7. Explain 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 demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would require the information to be collected that is inconsistent with the above guidelines.

- 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 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 three 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 (PRA) (44 U.S.C. 3506(c)(2)(A)), OSHA published a 60-day notice in the Federal Register on January 10, 2025 (90 FR 2033), soliciting comments on its proposal to extend the OMB's approval of the information collection requirements specified in OSPP for Worker Safety and Health under Docket Number OSHA-

2011-0861. This notice is part of a preclearance consultation program that allows 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 public comments in response to this notice.

OSHA communicates with its partners individually during the initial stages of the partnership, during the annual evaluation process, and again at the final evaluation at the completion of the partnership. These communications include monitoring and evaluation efforts, data collection issues, information sharing, and collaboration on best practices or outreach efforts. In addition, regional staff meets with individual partners periodically and as needed, but at least annually. National office OSHA staff holds quarterly calls with regional staff to discuss updates and the status of partnerships, including discussions of partnership evaluations and any changes or updates to data collection or information sharing.

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

No payments or gifts are provided to the respondents.

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

Data collected regarding partnerships is considered public information. Therefore, there is no assurance of confidentiality provided to respondents through statute, regulation, or agency policy.

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.

OSPP participants are not subjected to questions of a sensitive nature.

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 burden hour 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. Respondent Burden Hour and Cost Burden Determinations**

RESPONDENT BURDEN-HOUR AND COST BURDEN DETERMINATIONS

The agency determined the wage rates from mean hourly wage earnings to represent the cost of an employee's time. For relevant standard occupational classification category, OSHA used the wage rates reported in the Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Employment Wage Statistics (OEWS), May 2023. (OEWS data is available at [May 2023 National Occupational Employment and Wage Estimates \(bls.gov\)](https://www.bls.gov/news.release/oeos23.pdf)).

To account for fringe benefits, the agency used the BLS 10:00 AM (EDT), Tuesday, September 10, 2024 news release: *Employer Costs for Employee Compensation* news release text released ([Employer Costs for Employee Compensation Summary - 2024 Q02 Results](https://www.bls.gov/news.release/comp24.pdf) [date accessed: October 15, 2024]). BLS reported that for private industry workers, fringe benefits accounted for 29.7 percent of total compensation, and wages accounted for the remaining 70.3 percent. To calculate the loaded hourly wage for each occupation, the agency divided the mean hourly wage rate by one minus the fringe benefits.

Table 1 —Wage Hour Estimates				
Occupational Title	Standard Occupation Code	Mean Hour Wage Rate (A)	Fringe Benefits (B)	Loaded Hourly Wage Rate (C)=A / (1-B)
Occupational Safety and Health Specialist	19-5011	\$41.14	.297	\$58.52
Clerical	43-9061	\$20.94	.297	\$29.79

Number of Partnerships

As of August 27, 2024, there are 106 active Partnerships. OSHA anticipates ending this fiscal year at, or very near, a projected 106 . OSHA experienced a significant increase in the number of new Partnerships in 2023 and 2024 due to the diminished impact from the Covid-19 shutdown, improved economy, increased demand for new construction projects, and a new approach to develop more Partnerships. There were 44 Partnerships signed this fiscal year. OSHA has 12 Partnerships currently pending, awaiting a signing date and signing ceremony venue to be named.

Table 2—Estimated Annualized Partnerships				
Fiscal Year	Base (Open OSPs on October1st)	New Partnerships (+)	Concluded (-)	Total
2022	55	21	23	53
2023	80	38	15	103
2024	80	44	18	106 projected
Annualized	72	34	19	106*
* As the average, 87 partnerships, is less than the current 106 partnerships, the agency uses the 106 to account for all existing partnerships.				

Number of Respondent Employers

Information received through initial estimates and each partnership’s annual evaluation allows OSHA to track the number of participants in each partnership. Based on totals at the end of the last three fiscal years, OSHA can estimate that each partnership has an average of 22 participant employers, and the program overall has an average of 1,921 active participants each year.

Table 3—Average Participants per Partnership			
Fiscal Year	Partnerships Open as of September 30th	Total Participant Employers	Average Participants/ Partnership
2022	53	1,166	

2023	103	2,266	
2024	106	2,332	
Average	87	1,921	22

Table 4
Estimated Annualized Respondent Hour and Cost Burden Table

Information Collection Requirement	Number of Partnerships (Respondents)	Average Number of Participants per Partnerships (Respondents)	Responses per Respondent	Total Responses	Time per Response	Burden Hours	Loaded Hourly Wage	Burden Cost
Partnership Establish	34	22	1	748	11	8,228	\$29.79	\$245,112
Partnership Implementation	106	22	1	2,332	8	18,656	\$58.52	\$1,091,749
Measurement and Evaluation	106	22	1	2,332	3	6,996	\$29.79	\$208,411
Total	106*	22	--	5,412	--	33,880	--	\$1,545,272

***The number of respondents is: 106**

Based on the averages gleaned from Tables 2 and 3, the following estimates can be established for public participant employers' burden hours and costs:

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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 a 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 Department associates no start-up, capital, maintenance, or operations costs with this ICR.

14. Provide estimates of annualized costs 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.

OSHA used the hourly wage rate for a General Schedule level 13 step six (GS-13/6) of \$49.48 for a professional.⁴ Costs incurred by the Federal government include approximately two hours per new partnership in development and establishment and three hours annually for evaluation, for a total cost of \$19,100 (see Table 5 below). The costs incurred in conducting onsite verification visits are part of the routine cost of conducting OSHA compliance assistance and enforcement activity and not specific to the OSPP.

Table 5 – Annualized Federal Government Cost					
Activity	Number of Partnerships	Hours per Federal Worker	Total Federal Worker Time	Federal Wage Rate (GS13/06)	Federal Cost
New Partnership	34	2	68	\$49.48	\$3,365

Table 5 – Annualized Federal Government Cost					
Activity	Number of Partnerships	Hours per Federal Worker	Total Federal Worker Time	Federal Wage Rate (GS13/06)	Federal Cost
Costs					
Measurement and Evaluation Costs	106	3	318	\$49.48	\$15,735
Total			386		\$19,100

⁴ Source: This wage rate of \$49.48 for a GS-13, step 6 is taken from the U.S. Office of Personnel Management, *General Schedule and Locality Tables, Salary Table 2024-RUS*, [SALARY TABLE 2024-GS \(opm.gov\)](#)

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

The agency is requesting an adjustment increase in burden going from 18,480 to 33,880 hours, a difference of 15,400 hours. The increase in burden is due to an increase in the number of employers and participants.

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 the information, completion of report, publication dates, and other actions.

The agency will use information on partnerships both internally and externally to gauge its conformance with the goals and objectives outlined in OSHA’s Strategic Plan.

17. If seeking approval not to 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 dates in the *Federal Register* announcing the OMB approval of the information collection requirement (see 5 CFR 1320.3(f) (3)). OSHA believes this is the most appropriate and accurate mechanism to inform interested parties of these expiration dates.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

OSHA Strategic Partnership Program (OSPP) For Worker Safety and Health

OMB Control Number: 1218-0244

Expiration Date: August 31, 2025

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

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