SUPPORTING STATEMENT FOR
Registration and Nondiscrimination in Apprenticeship Programs
OMB Control No. 1205-0223

This Information Collection Request (ICR) seeks OMB approval for a revision to 1205-0223, titled "Registration and Equal Employment Opportunity in Apprenticeship Programs."

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 National Apprenticeship Act (NAA) of 1937, (29 U.S.C. 50), authorizes the Secretary of Labor (Secretary) to "formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices." Pursuant to this authority, the Department's Employment and Training Administration (ETA) Office of Apprenticeship (OA) issued regulations governing Registered Apprenticeship programs at 29 CFR parts 29 and 30. This Information Collection Request (ICR) revises OMB Control Number 1205-0223 to reflect the Department's final rule, *Prohibiting Illegal Discrimination in Registered Apprenticeship Programs* (RIN 1205-AC21). Based on the proposed changes, the Department is changing the title of this ICR to *"Registration and Nondiscrimination in Apprenticeship Programs*."

Item 15 below details the specific changes to this ICR's information collection instruments included in this ICR revision.

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.

ETA Form 671 Sections I and II collect information required for Registering Apprenticeship programs and documenting Apprentice Agreements as specified in 29 CFR part 29. Section I is filled out by program sponsors to register new programs or update existing ones, ensuring compliance with registration and apprenticeship standards and determining the applicability of collective bargaining agreements. Section II establishes the Apprenticeship Agreement and registers apprentices, supporting enrollment, documenting participation, enabling ETA to maintain national apprenticeship data, and updating nondiscrimination language to align with the final rule. The collection of information through Section II communicates program terms to apprentices, documents the sponsor's regulatory commitment, and allows OA to track participation. Section II also includes a section that allows an apprentice to voluntarily self-report

their disability status. This section of the form, which will be referenced as "Section IIA", is detachable from the rest of Section II and required to be kept separately from the remainder of the form for human resources purposes.

The data from both sections is reported into Registered Apprenticeship Partners Information Data System (RAPIDS), reviewed by the Registration Agency to determine compliance, and used to respond to inquiries and conduct program reviews.

In addition, ETA Form 9186 is completed quarterly by 10 State Apprenticeship Agency (SAA) States/territories not using RAPIDS, providing essential program and apprentice data for national monitoring and calculation. Demographic data questions of ETA Form 9186 supplements RAPIDS data to maintain a comprehensive national dataset on apprenticeship participation and demographics, ensuring OA has the necessary information for oversight and reporting across the National Apprenticeship System.

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.

ETA administers Registered Apprenticeship programs through RAPIDS, which supports electronic information collection of program registration, apprentice registration, and program updates consistent with the Government Paperwork Elimination Act and the E-Government Act. RAPIDS reduces burden by allowing previously submitted information to populate subsequent transactions, minimizing duplicate data entry and improving data quality. ETA staff also provide technical assistance to sponsors and apprentices that are unable to utilize electronic submission.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

ETA reduces duplication by integrating program and apprentice registration, as well as management, within RAPIDS. The system reuses submitted information where possible, though separate forms are needed for distinct purposes: ETA Form 671 Section I registers programs, Sections II and IIA record individual apprentice information for the apprenticeship agreement, and ETA Form 9186 is used by SAAs not in RAPIDS for quarterly data. The Department confirms there is no unnecessary duplication.

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

Submitting electronically through RAPIDS reduces duplicate data entry. ETA staff can help

sponsors with any part of the information collection as outlined in this ICR.

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.

Registering Apprenticeship programs and apprentices is necessary to meet National Apprenticeship Act and 29 CFR 29 regulatory requirements, set quality standards, and protect apprentices; reporting and recordkeeping are required to ensure sponsors and SAAs comply with federal regulations and to further the purposes of the National Apprenticeship Act. ETA Form 671 Section II is submitted once per apprentice, so further reduction of burden is not possible. Quarterly data from SAAs not using RAPIDS is needed for accurate national reporting, and the Department relies on timely, reliable data to monitor, improve, and report on Registered Apprenticeship programs and stakeholder compliance. Collecting less or no information would negatively impact these efforts.

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 secrets, 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.*

Information is collected and kept for 5 years, covering most apprenticeship durations. This ensures records remain at least one year after apprentices leave. See 29 CFR 29.5(b)(23) and 30.7(c) for details.

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 existing 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.

The Notice of Proposed Rulemaking was published in the Federal Register on July 2, 2025, 90 FR 28947. A copy of the notice is available at https://www.federalregister.gov/documents/2025/07/02/2025-12317/prohibiting-illegal-discrimination-in-registered-apprenticeship-programs. The associated ICR, 90 FR 41414, was published on August 25, 2025. A copy of the notice is available at https://www.federalregister.gov/documents/2025/08/25/2025-16255/agency-information-collection-activities-comment-request-registration-and-equal-employment.

The FRN related to the ICR received one comment emphasizing the importance of outreach and recruitment for young adults in certain subgroups and the need to collect race and ethnicity data for equity and accountability, while recommending that equity-focused organizations be involved in improving hiring practices. The Department responded that targeted outreach is likely unlawful and that racial and ethnic demographic information will still be collected voluntarily via ETA Form 671 Section II. The Department also streamlined the Registered Apprenticeship program complaints process by vesting the responsibility for investigating such complaints exclusively with the Equal Employment Opportunity (EEOC) and other fair employment practices agencies.

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

This information collection does not involve payments or gifts provided to respondents.

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

Apprenticeship registration is collected through ETA Form 671 Section II and maintained in the DOL/ETA-31 system under the Privacy Act of 1974 (5 U.S.C. 552a).[1] ETA Form 671 Section II provides a Privacy Act Statement and allows voluntary disclosure of Social Security numbers for program management, including employment and wage verification. All data is protected and stored as described in the Privacy Act notice.

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 ICR does not include any 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 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 reporting requirements covered in this ICR are as follows:

- ETA Form 671, Section I (Program Registration)
- ETA Form 671, Section II (Apprenticeship Agreement and Apprentice Registration)

[1] Privacy Act of 1974; 81 FR 25765. *See* https://www.federalregister.gov/documents/2016/04/29/2016-09510/privacy-act-of-1974-publication-in-full-of-all-notices-of-systems-of-records-including-several-new.

- ETA Form 9186 (SAA Self-Assessment Report for Program Data and Apprentice Demographics)

The recordkeeping requirements covered in this ICR are as follows:

- **29 CFR 29.5(b)(23)** sets forth recordkeeping requirements for program sponsors. Stakeholders involved with the collection of information set forth by the Registered Apprenticeship program recordkeeping framework include Registered Apprenticeship program sponsors and the Registration Agency staff (either OA or SAA staff) who review and analyze data received through recordkeeping processes.

- **29 CFR 30.7(c)** sets forth recordkeeping requirements related to nondiscrimination in Registered Apprenticeship programs. Under the final rule at § 30.7, recognized SAAs are required to keep all records pertaining to program compliance reviews and any other records pertinent to a determination of compliance with part 30; such records must be maintained for 5 years from the date of their creation. This SAA recordkeeping requirement would include any written disclosures by a Registered Apprenticeship program sponsor to a Registration Agency (including an SAA) made pursuant to § 30.5 of any instances where an enforcement entity or court with jurisdiction over an applicable nondiscrimination law (such as the EEOC or a State Fair Employment Practices Agency) has rendered a final determination (without any remaining right of appeal) that the sponsor has violated such laws relating to an apprentice or an applicant for apprenticeship within 60 days of the rendering of such a final determination. Stakeholders involved in the collection of information related to part 30 recordkeeping requirements would be SAA staff, who would have to retain records pertaining to program compliance reviews, and any other records pertinent to a determination of compliance with the part 30 regulation.

Estimated Annual Respondent Cost and Hour Burden
Table 1: ETA Form 671, Section I – Program Registration

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
ETA Form 671, Section I (Sponsor)							
ETA Form 671, Section I for New Sponsors Developing Standards	344	1.00	344	0.67	230	$36.10	$8,302

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
29 CFR 29.5, 29.7, and 29.13							
ETA Form 671, Section I for Sponsors Existing Prior to FY 2026 29 CFR 29.5, 29.7, and 29.13	26,466	1.00	26,466	0.33	8,733	$36.10	$315,274
Total	***26,810***	***-***	***26,810***	***-***	***8,964***	***-***	***$323,576***
ETA Form 671, Section I (SAA)							
ETA Form 671, Section I: Review/Provide Input on New Standards 29 CFR 29.8 and 29.10	143	1.00	143	0.67	96	$88.88	$8,532
ETA Form 671, Section I: Review/Provide Input on Pre-Existing Standards 29 CFR 29.8 and 29.10	11,012	1.00	11,012	0.17	1,872	$88.88	$166,383
Total	***11,155***	***-***	***11,155***	***-***	***1,986***	***-***	***$174,916***

Table 2: Estimated Annual Respondent Cost and Hour Burden for ETA Form 671, Section II – Apprenticeship Agreement and Apprentice Registration

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
ETA Form 671, Section II 29 CFR 29.5, 29.7, 29.13	337,875	1.00	337,875	0.17	57,439	$36.10	$2,073,548

New Apprentices (Sponsors)							
ETA Form 671, Section II 29 CFR 29.5, 29.7, 29.13 New Apprentices (SAAs)	140,586	1.00	140,586	0.08	11,247	$88.88	$999,633
Total	***478,461***	***-***	***478,461***	***-***	***68,686***	***-***	***$3,073,181***

Table 3: Estimated Annual Respondent Cost and Hour Burden for ETA Form 9186 - State Apprenticeship Agency (SAA) Self-Assessment Report for Program Data and Apprentice Demographics

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
ETA 9186 (SAA)							
ETA Form 9186, SAA Self-Assessment Report for Program Data and Apprentice Demo-graphics under part 29.6	10	4.00	40	1.00	40	$88.88	$3,555
Total	***10***	***-***	***40***	***-***	***40***	***-***	***$3,555***

Table 4: Estimated Annual Respondent Cost and Hour Burden for Part 29 Recordkeeping

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Recordkeeping (Sponsor)							
Recordkeeping (Registered with OA)	15,655	38.18	597,708	0.50	298,848	36.10	$10,787,616

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Recordkeeping (Registered with an SAA)	11,155	38.18	425,898	0.50	212,956	36.10	$7,687,144
Total	***26,810***	***-***	***1,023,620***	***-***	***511,803***	***-***	***$18,474,759***
Recordkeeping (SAA)							
Recordkeeping (SAA)	33	338.03	11,155	0.25	2,789	$88.88	$247,886
Total	***33***	***-***	***11,155***	***-***	***2,789***	***-***	***$247,886***

Table 5: Estimated Annual Respondent Cost and Hour Burden for Compliance Reviews

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Compliance Review (Sponsor)							
Compliance Reviews (Sponsors)	5,362	1.00	5,362	56.00	300,272	$113.78	$34,164,948
Total	***5,362***	***-***	***5,362***	***-***	***300,272***	***-***	***$34,164,948***
Compliance Reviews (SAA)							
Compliance Reviews (SAA)	2,231	1.00	2,231	40.00	89,240	$88.88	$7,931,651
Total	***2,231***	***-***	***2,231***	***-***	***89,240***	***-***	***$7,931,651***

Part 30 Requirements

The part 30 information collection requirements are estimated to require an annual burden of 68,641 hours.

Table 6: Estimated Annual Respondent Cost and Hour Burden for Submitting an Updated State Plan

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Updating and Submitting State Plan							
Updating and Submitting State Plan (SAAs)	33	1	33	2,080	68,640	$88.88	$6,100,723
Total	***33***	***-***	***33***	***-***	***68,640***	***-***	***$6,100,723***

Summary of Burden

The total burden on stakeholders from the requirements and form described above is summarized in the table below.

Table 7: Summary Table of Estimated Annual Cost and Hour Burdens for External Stakeholders

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Total Burden Cost
ETA Form 671, Section I (Sponsors)	26,810	1.00	26,810	-	8,964	$323,576
ETA Form 671, Section I (SAAs)	11,155	1.00	11,155	-	1,968	$174,916
ETA Form 671, Section II (Sponsors)	337,875	1.00	337,875	0.17	57,439	$2,073,548
ETA Form 671, Section II (SAAs)	140,586	1.00	140,586	0.08	11,247	$999,633
ETA Form 9186 (SAAs)	10	4.00	40	1.00	40	$3,555
Sponsor and Employer part 29 Recordkeeping	26,810	38.18	1,023,606	0.50	511,803	$18,474,759
SAA part 29 Recordkeeping	33	338.03	11,155	0.25	2,789	$247,886
Compliance Reviews (Sponsors)	5,362	1.00	5,362	56.00	300,272	$34,164,948
Compliance Reviews (SAAs)	2,231	1.00	2,231	40.00	89,240	$7,931,651

Updating and Submitting State Plan (SAAs)	33	1.00	33	2,080	68,640	$6,100,723
Total	***550,938***	***-***	***1,558,853***	***-***	***1,052,402***	***$70,494,495***

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) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

There are no additional costs to respondents or recordkeepers resulting from the collection of information.

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.

The burden to the Federal Government is based on the GS-12, Step 5 Federal government compensation of $100.11 per hour for ATR Federal staff and a GS-13, Step 5 Federal government compensation of $119.04 per hour for an OA program analyst.[2]

The burden to Federal staff primarily includes reviewing materials submitted by program sponsors, inputting data into the RAPIDS database, returning copies to sponsors and other partners, and conducting program reviews as appropriate.

Costs related to apprentices

For new apprenticeship agreements, the process of affirming the registration of new apprentices is estimated to take Federal staff around 5 minutes per new apprentice. The Department estimates that in 2026, 337,875 new apprentices will be registered by OA. Based on the 2026 estimated data, the annualized cost to the Federal Government for new apprentice registrations is $1,580,023 [15,783 hours (197,289 x 0.08 hours) x $100.11]. Estimated annualized cost per apprentice registered with OA is $8.01 ($1,580,023 divided by 197,289).

Costs related to Registered Apprenticeship programs

For new apprenticeship programs, OA staff must review apprenticeship standards and work with program sponsors to modify these standards as necessary. The Department estimates that the process of reviewing these new program standards takes 40 minutes. The Department estimates that in 2026 there will be 201 new programs registered with OA. Based on the 2026 new program estimates, the annualized cost to the Federal Government for reviewing new programs standards is $13,515 [135 hours (201 x .67 hours) x $100.11]. Estimated annualized cost per new program registration is $67.24 ($13,515 divided by 201).

The Department estimates that existing sponsors will also need to update their standards to reflect the changes to part 30. The Department estimates that there will be 26,466 pre-existing

[2] The ATR's basic inflation-adjusted hourly rate is $55.62 per hour and the GS-13 program analyst's basic hourly rate is $66.14 in the Washington, D.C., locality area in 2026 (see https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB.pdf). Based on data from BLS' "Employer Costs for Employee Compensation" release (https://www.bls.gov/news.release/ecec.nr0.htm), the percentage of a public sector employee's total compensation package that consisted of employee benefits averaged 63% over the past year. In addition, total related overhead costs are estimated to comprise an additional 17% of the applicable base wage (source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program," June 10, 2002, https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005). Accordingly, the total inflation-adjusted hourly compensation rate for an ATR (adjusted to include employee benefits and overhead costs) is estimated to be $100.11 per hour ($55.62 hourly base wage + $35.04 in employee benefits + $9.45 in overhead costs) and the inflation-adjusted hourly compensation rate for a program analyst is estimated to be $119.04 per hour ($66.14 wage + $41.67 benefits + $11.24 overhead).

programs registered with OA by FY 2026.[3] The Department estimates that the review and input provided by OA staff for program sponsors to update pre-existing programs' standards will take 10 minutes, which results in 2,627 annual burden hours (15,454 x 0.17 hours). The annualized cost to the Federal Government is $262,987 (2,627 hours x $100.11). Estimated annualized cost per update to existing standards is $17.02 ($262,987 divided by 15,454).

Recordkeeping

OA must maintain accurate records on the standards of apprenticeship for each program they register. This includes maintaining records relating to the operation of the Registered Apprenticeship program. Compliance with this recordkeeping requirement is estimated at 15 minutes per OA-registered program, and the Department estimates there will be 26,466 programs registered with OA in FY 2026. Therefore, the annual burden in FY 2026 is equal to 3,914 hours (15,655 programs x 0.25 hours), and the estimated cost to the Federal Government is equal to $391,827 (3,914 hours x $100.11).

Program reviews

The process of conducting reviews to ensure a sponsor's compliance in accordance with parts 29 and 30 is estimated to take 40 hours per review every 5 years, implying approximately 20 percent of programs are reviewed each year. It is estimated that there will be 26,466 programs registered with OA by FY 2026, meaning 3,131 programs will be reviewed each year (15,655 x 0.20). The estimated annualized cost to the Federal Government for all sponsor compliance reviews is $14,908,973 [125,240 (40 hours x 3,131 programs reviewed in FY 2026) x $119.04].

Exemptions

Regarding requests for exemptions that must be reviewed and approved by OA, OA's final rule reflects a significant revision of part 30 requirements that removes several burdensome requirements on sponsors. Based on these changes and the Department's historical experience with exemptions, the Department does not anticipate that it would receive or grant many, if any exemptions for the finalized, streamlined part 30 requirement that sponsors must not engage in illegal discrimination.

Summary table of costs to the Federal Government

Type of Action	Total Cost
Apprentice-Related Actions	$1,580,023
New Program Standards	$13,515

[3] 15,655 total sponsors registered with OA during FY 2026 minus the 201 new sponsors gained that year.

Updating Existing Standards	$262,987
Recordkeeping	$391,827
Other Compliance-Related Actions	$14,908,973
Total	$17,157,324

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

The Department's justification for this ICR centers on the need to revise the previously approved information collection (OMB Control No. 1205-0223) to reflect updates to part 30 regulations affecting the registration and operation of Registered Apprenticeship programs. These regulatory changes require modifications to the associated forms in the ICR package. Specifically, the revision is necessary to implement the Department's final rule that updates part 30 and to ensure OA's forms correspond with those regulatory changes. The changes include discontinuing specific forms, such as ETA Form 671, Section IIA – Voluntary Disability Disclosure and ETA Form 9039 (Complaint Form – Equal Employment Opportunity in Apprenticeship Programs), to align with the elimination of related regulatory requirements. ETA Form 671 Section II and ETA Form 9186, are revised to conform with updated standards and reporting requirements. Additionally, the revisions remove outdated questions and sections,[4] update language for clarity and compliance, and ensure recordkeeping costs and burden estimates reflect the most recent apprenticeship data and regulatory assumptions. These adjustments collectively ensure that the information collected is relevant, accurate, and compliant with the Department's final rule, thereby supporting effective oversight and operation of Registered Apprenticeship programs.

Below, the Department identifies the key changes between the existing burden estimation methodology and assumptions and the final rule data and approach.

- Updates the burden estimates consistent with the most recent available apprenticeship data and includes a public burden statement to ETA Form 671. Section I.
- Updates baseline assumptions for ETA Form 671, Section II to assume recordkeeping costs for documenting completion of the Registered Apprenticeship program are captured in part 29 recordkeeping requirements.

[4] Among these revisions, Question 4 of ETA Form 671 Section II has been updated to reflect the merger and refinement of race and ethnicity categories per OMB's 2024 amendment to its Statistical Policy Directive (SPD) 15, "Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity" (see 89 FR 22182, issued on March 29, 2024). Consistent with this OMB guidance, the Department has revised Question 4 by (1) adding a new race/ethnic category, "Middle Eastern or North African," (2) by including the "Hispanic or Latino" category as one of the race/ethnicity options, and (3) by revising the scope and definitions of the race/ethnicity options to align with the updated definitions contained in SPD 15. The 2024 *Federal Register* notice from OMB announcing the SPD 15 updates stipulated that "all existing record keeping or reporting requirements should be made consistent with these standards . . . any time a collection of information is submitted to OIRA for approval of either a revision or extension under the Paperwork Reduction Act of 1995 (PRA) as soon as possible, but not later than March 28, 2029." Accordingly, since the revised information collection contained in this updated ETA Form 671 submission would remain in effect beyond that deadline for implementation, the Department felt that this would be an opportune moment to revise the form to reflect the updated OMB race/ethnicity categories.

- Updates language in Recordkeeping Requirements for part 29 to reflect the updated assumption that the cost of documenting apprenticeship completion is included in the cost estimates for part 29 recordkeeping requirements.
- Adds new Section 30.4 – Complaints section to separately present the description and associated cost estimate for SAAs related to forwarding discrimination complaints to relevant fair employment practices agencies under the appropriate regulatory provision.
- Adds new Section 30.5 – Nondiscrimination Compliance Reviews and Enforcement describing the final rule's disclosure requirement for sponsors and discussing the potential administrative burden qualitatively.
- Updates the language in Section 30.7 – SAAs to remove the independent consideration of costs to SAAs for forwarding discrimination complaints to relevant agencies due to the consideration of this cost in the recordkeeping requirements for part 29.
- Updates apprentice completion rate assumption to reflect recent data from DOL's Apprentice Completion Rate Analysis dashboard (46 percent).[5]

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.

The Department intends to use summary information to respond to requests from Departmental leadership, the White House, Congress, public interest groups, advocacy organizations, Registered Apprenticeship program sponsors, Registered Apprenticeship stakeholders, and the general public.

OA does publish summary data about the number of active, new, and completed apprentices, as well as demographic data on apprentices (including sex, race, ethnicity, veteran status, and education level) filterable by State, occupation, industry, and other categories on the Department's website for apprenticeship at www.apprenticeship.gov/data-and-statistics/apprentices-by-state-dashboard. This data is updated periodically (monthly, based on changes to apprentice and apprenticeship program data captured in RAPIDS, and quarterly, based on the data reporting cycle for SAA "portal States") as data comes into the Department's system for tracking apprenticeship data (RAPIDS). This publicly available data includes prior fiscal years back to Fiscal Year 2015. The data is displayed in an interactive display format to enable apprenticeship stakeholders and members of the public to ascertain key data points about the extent and coverage of Registered Apprenticeship programs and the apprentice population nationally and by State.

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.

[5] U.S. DOL. (2026). Apprentice Completion Rate Analysis (Beta). Available at: https://www.apprenticeship.gov/data-and-statistics/completion-rate-analysis

Not applicable. ETA displays the OMB Control Number and the expiration date.

18. Explain each exception to the certification statement.

No exceptions are requested.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.