

Attachment C

Methodology and Data Used to Calculate Respondent Burdens and Costs and Estimated Wage Rates

To calculate the full costs of the burden associated with compliance with the rule governing pesticide research that involves human subjects, OPP obtains unloaded hourly wage rates from the BLS National Industry-Specific Occupational Employment and Wage Estimates. The unloaded hourly wage is multiplied by a benefits percentage factor to account for non-wage remuneration including leave, health benefits, and other compensation to obtain the loaded hourly wage rate. For all non-farm, nonfederal civilian employees, BLS estimates non-wage benefits to be 45.1 percent of wages. Finally, the loaded hourly wage rate is multiplied by a percentage factor representing overhead costs of labor, such as office space and equipment, to obtain the fully loaded hourly wage rate. Following EPA guidelines that overhead ranges between 20 and 70 percent of the loaded wage rate, uses an overhead factor of 50 percent.

For entities submitting information about studies involving human subjects, OPP obtains wages for employment within the North American Industry Classification System (NAICS) category for Research and Development in the Physical, Engineering, and Life Sciences, NAICS 541710. Standard Occupational Codes for the relevant categories are:

- Management – 11-0000, Management Occupations
- Technical – 19-0000, Life, Physical, and Social Science Occupations
- Clerical – 43-0000, Office and Administrative Support Occupations

Wages, NAICS - 541710

Wage	Labor Category		
	Managerial	Technical	Clerical
Unloaded Hourly Rate ¹	\$102.86	\$51.89	\$32.87
Benefits per hour ²	\$46.43	\$23.42	\$14.84
Loaded Hourly Rate	\$149.29	\$75.31	\$47.71
Overhead per hour ³	\$74.65	\$37.66	\$23.85
Fully Loaded Hourly Rate	\$223.94	\$112.97	\$71.56

1. Source: BLS <https://data.bls.gov/oes/#/industry/541710> (MAY 2024 Data) Last modified: April 2, 2025

NAICS - 541710 Research and Development in the Physical, Engineering, and Life Sciences

Standard Occupational Codes:

Management – 11-0000, Management Occupations

Technical – 19-0000, Life, Physical, and Social Science Occupations

Clerical – 43-0000, Office and Administrative Support Occupations

2. The average benefits for non-farm, nonfederal civilian workers are 45.1% of wage per hour.

3. Overhead percentage is 50% of loaded hourly wage per U.S. Environmental Protection Agency, EPA Air Pollution Control Cost Manual, Sixth Edition, EPA-452-001, January 2002, pg. 2-34. The loading for indirect costs is within the range of 20-70% of the load labor rate (wage + benefits) suggested in EPA guidance.

For Agency labor, OPP obtains wages for employment within the NAICS category for the Federal Executive Branch, NAICS 99910, and the Standard Occupational Codes listed above.

Wages, NAICS - 999100

Labour Category	Labor Category		
	Managerial	Technical	Clerical
Unloaded Hourly Rate ¹	\$73.56	\$49.11	\$27.11
Benefits per hour ²	\$33.21	\$22.17	\$12.24
Loaded Hourly Rate	\$106.77	\$71.28	\$39.35
Overhead per hour ³	\$53.38	\$35.64	\$19.67
Fully Loaded Hourly Rate	\$160.15	\$106.92	\$59.02

1. Source: BLS <https://data.bls.gov/oes/#/industry/999100> (MAY 2024 Data) Last modified: April 2, 2025

NAICS 999100 - Federal Executive Branch Standard Occupational Codes:

Management - 11-0000, Management Occupations

Technical - 19-0000, Life, Physical, and Social Science Occupations

Clerical - 43-0000, Office and Administrative Support Occupations

2. The average benefits for non-farm, nonfederal civilian workers are 45.1% of wage per hour.

3. Overhead percentage is 50% of loaded hourly wage per U.S. Environmental Protection Agency, EPA Air Pollution Control Cost Manual, Sixth Edition, EPA-452-001, January 2002, pg. 2-34. The loading for indirect costs is within the range of 20-70% of the load labor rate (wage + benefits) suggested in EPA guidance.