**SUPPORTING STATEMENT FOR**
**Registration for Public Data Service**

**OMB CONTROL NO. 1290-0044**

This ICR seeks an extension, without change, of a currently approved 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 US Department of Labor (DOL) is developing a new public facing data service consistent with the requirements of Title II of the Foundations for Evidence-Based Policymaking Act of 2018[1], the goals described in DOL's Enterprise Data Strategy[2] and the Federal Data Strategy[3], and feedback from a public Request For Information (RFI) on how DOL can optimally structure its public data offerings available through Docket No. DOL-2021-0005 at www.regulations.gov[4]. To best ensure that this service will optimally meet current, evolving, and long-range needs among public, private, and Federal data users, specifically with respect to the kinds of data offered, the formats of machine-readable data provided, the kinds of services that can connect to the Application Programming Interface (API), and the kinds of documentation provided, DOL anticipates collecting a limited number of characteristic data elements from prospective users. These data elements will guide DOL efforts to ensure that the service, documentation, training, tutorial, and outreach services are customer focused, by informing us about potential use cases, as well as user preferences for tools, data, and services. The questions will also provide valuable information about user familiarity with Application Programming Interface (API) usage, software for making connections and calls to APIs, questions about topics of analysis to ensure that our creation of tutorials, code examples, documentation, and data schema best reflect the collective needs of the services users. The information will also be used to identify patterns and trends among users to inform proper administration of the service.

As cited above, there are laws and policies compelling agencies to make the data they collect into public data assets, and to do so in a manner that minimizes the challenges for the public in finding, accessing and reusing that data. These mandates are echoed in the goals of the Federal Data Strategy and DOL's own Enterprise Data Strategy. For the strategic value in Federal data to be realized, it must be made available to people who can explore and analyze it, identify promising trends and patterns, and suggest innovative use cases. DOL is moving to come into

[1] https://www.congress.gov/bill/115th-congress/house-bill/4174/text
[2] https://www.dol.gov/sites/dolgov/files/Data-Governance/DOL-Enterprise-Data-Strategy-2022.pdf
[3] https://strategy.data.gov/2021/action-plan/
[4] https://www.regulations.gov/document/DOL-2022-0003-0001

compliance with these mandates and meet the goals articulated in the data strategy documents that guide us.

**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 data collected will primarily be used to ensure that the needs of the users shape the supporting materials, services, data, and relating training materials DOL provides to support users. Effective services for providing access to machine readable data require much more than data, and interfaces: documentation, code examples, tutorials, and use cases often have a tremendous impact on the degree to which a data service is seen as useful and can grow into something that can help to transform data-as-a-service within an agency. Given the central goal of serving data to the public, their use cases and needs are a particularly critical input to shaping the resources DOL makes available to promote effective and efficient use of the platform. DOL staff from the Office of Data Governance will use this information internally for planning, optimizing user experience, and making the administration of the service as efficient and effective as possible for users. DOL will not disclose any individual information being collected to the public. DOL will not use this information for outreach and will submit additional requests for future data collection for conducting surveys of users and assessing utility and benefit from the services provided.

**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.**

The information is collected through an electronic and automated web interface at the point of user registration. Each potential user registering to use the system will see an identical questionnaire, with consistent questions and response categories. Free text entry is limited, so the information collected will provide DOL with data that are fit for purpose, and suitable for administering the program. DOL has invested considerable effort in having user interface and customer experience experts review this interface so that the questions are readily understandable, context specific assistance can be provided, and the response categories are clearly understood by potential users.

**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.**

There is no way to access, obtain, or gather this information beyond asking the users to provide it. DOL has done due diligence in seeking to understand if there are proxy values that could be used and has not found anything available. Though DOL has created two prior public-facing APIs, no such information was or is collected as part of the user registration for those services.

DOL also conducted extensive conversations with other Federal agencies that offer APIs to understand whether they had data that could serve this purpose and did not identify anything responsive, or meaningfully useful.

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

The information collection does not target small businesses or entities, and there is no requirement to provide information. The burden associated with this collection is very small when compared with the benefit that accrues to system users from ensuring that the service best reflects their needs.

**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.**

DOL has consistently demonstrated a commitment, through its RFI on open data, Enterprise Data Strategy, investment in the design and development of APIs and open data services, work towards establishing metadata standards, and building a consolidated data portal to create the best possible customer experience and the greatest utility for members of the public who wish to have convenient and analytically useful access to data. Failure to collect this information would significantly reduce DOL's ability to have an understanding of our customers and stakeholders and would increase the risk that the service did not meet current and evolving needs of users, risk of increased attrition among current users, diminished adoption of the service, and a less effective open data program.

**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;**

- **that includes a pledge of confidentially 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 confidentially to the extent permitted by law.**

There are no special circumstances for the proposed data collection efforts.

**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.**

The 60-day notice (91 FR 56221) to solicit public comments was published in the **Federal Register** on September 1, 2026. A correction to this notice (91 FR 61451) was published September 29, 2026. A second correction (91 FR 73798) was published November 17, 2026. No comments were received.

Extensive consultation was conducted outside of the agency on the topics of establishing and administering APIs, managing open data services, and simplifying and enhancing customer experience. DOL consulted with members of the Federal Open Data Community of Practice managed by the General Services Administration, the Developer Experience staff at the U.S. Census Bureau, staff from the Office of Applications Development at the Bureau of Economic Analysis, and staff from the Census Bureau’s Census Academy.

DOL also draws on a considerable amount of internal experience and subject matter expertise.

DOL has been developing and managing public-facing API and open data services since 2010. Over this period, DOL has accrued considerable experience with understanding users and optimizing services for the specific sources and types of data DOL manages. In addition, DOL benefits tremendously from the subject matter expertise among information scientists at the Bureau of Labor Statistics and has sought to ensure that their suggestions for managing the platform best reflect their ideas and input.

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

DOL will not provide any payments or gifts to respondents to this proposed information collection.

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

All respondents who provide information as part of the data collection activities described here are assured that information collected will be kept private to the extent permitted by law. In each data collection activity, respondents will be informed that all data will be used for internal administration purposes, performance metrics, and to guide enhancements to services, data offerings, documentation, and code examples.

**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.**

This collection 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. 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 data collection for these activities will be ongoing, as new users learn of the API and seek to gain access and use the service. DOL estimates that the service will add 200 new users each year, and the burden estimates below reflect the specific burden of individuals who are providing data as part of registering to use the service. Users are authenticated at registration through login.gov, so the burden estimates reflect a slight difference among users who already have login.gov account and those who don't. Since user authentication is a pre-requisite to registering for the service, we add the minor estimated time burden for doing so to this collection. We were unable to find an OMB Control Number for login.gov to identify specific estimates, so we are presenting accurate burden estimates based on extensive customer feedback and beta user testing from API Communities of Practice for Federal workers within DOL.

**ESTIMATED ANNUAL BURDEN HOURS**

| Type of Instrument (Form/Activity) | Number of Respondents | Number of Responses per Respondent | Total Number of Responses | Average Burden Time per Response (hours) | Estimated Burden Hours | Average Hourly Wage[1] | Monetized Vale of Time |
|---|---|---|---|---|---|---|---|
| With Login.Gov Account | 40 | 1 | 40 | .083 | 3.33 | $60.96 | $203.00 |
| Without Login.gov Account | 160 | 1 | 160 | .167 | 26.67 | $90.96 | $1625.80 |
| **Total** | **200** | | **200** | | **30** | | **$1,828.80** |

[1] Hourly wage for program staff and partners reflects the May 2025 mean hourly wage estimate for "data scientists" as reported by the U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wage Estimates, 2025, "May 2025 National Occupational Employment and Wage Estimates United States," (accessed from the following web site as of June 10, 2025: https://www.bls.gov/oes/current/oes_nat.htm. While the likely users of this service will come from a much more diverse population such as journalists, academics, public health professionals, state regulators, and social science researchers, this estimate is conservative and likely to produce an upper bound on burden costs.

**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 direct costs to respondents and no recordkeeping requirement imposed by API usage, or to be a respondent. The only burden on respondents is the time burden described in section 12.

**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 average, annualized cost to the Federal government over three years of managing API user information is estimated to be $10,000 in staffing costs and $2,500 in operations and maintenance. This estimate was provided by the system developers who are managing this system and accounts for the architecture of the system, costs of the storage solution, and costs of managing the software that includes the user interface and point of collection. The capability and requirement to collect this data already exists in a prior version of this service that is only available internally to DOL users, so there are no new development, testing or evaluation costs, and no costs associated with defining or creating a storage solution. The only costs DOL will incur are for storing, managing and accessing new information once this service becomes available to the public.

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

There are no program changes or adjustments. .

**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**.

This collection will generate universe administrative data (i.e. one record for each user, with complete data for all users) and will only be used for the purposes described. As noted throughout this form, the primary purpose of this collection is to ensure that the services, available data, and resources best reflect the needs of users. Some limited descriptive analysis may be generated to track user adoption, characterize users and use cases including measures of system use and describing people who are active, periodic, and inactive users, and to determine if and when it may be appropriate to conduct a user satisfaction survey. This collection does not include the burden associated with periodic surveys of users of the service and DOL will either submit a modification to this collection or a separate collection to enable authorization to conduct such surveys.

**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.**

The OMB approval number and expiration date will be displayed or cited on the interface within which users enter information for this data collection.

**18. Explain each exception to the certification statement.**

No exceptions are necessary for this information collection.