

**SUPPORTING STATEMENT FOR THE  
INFORMATION COLLECTION REQUIREMENTS OF THE  
STUDENT DATA FORM (OSHA FORM 182)  
OFFICE OF MANAGEMENT AND BUDGET (OMB)  
CONTROL NUMBER 1218-0172 (March 2023)**

This is an extension request for 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.**

Section 21 of the Occupational Safety and Health Act of 1970 (OSH Act or Act) (29 U.S.C. 670) authorizes the Occupational Safety and Health Administration (OSHA or agency) to conduct education and training courses. These courses must ensure an adequate number of qualified personnel to fulfill the purposes of the OSH Act, provide them with short-term training, inform them of the importance and proper use of safety and health equipment, and train employers and workers to recognize, avoid, and prevent unsafe and unhealthful working conditions.

Under Section 21, the OSHA Training Institute (OTI or Institute) provides basic, intermediate, and advanced training and education in occupational safety and health for Federal and State compliance officers, whistleblower investigators, agency professionals and technical-support personnel, employers, workers, organizations representing workers and employers, educators who develop curricula and teach occupational safety and health courses, and representatives of professional safety and health groups. The Institute provides courses on occupational safety and health and whistleblower protection at its national training facility in Arlington Heights, Illinois.

All course information, materials, tests, and virtual links are now managed through a learning management system. Non-Federal OSHA students attending Institute courses must request new user login credentials to access the learning management system. New user credentials can be requested through <https://oshaelearning.geniussis.com/PublicWelcome.aspx>. The registration form requires that the new user applicant provide information on their job specialization and affiliation and can be accessed through the button labeled “New User (other than federal OSHA).” (Last accessed: February 7, 2023)

The OSHA Office of Training and Education uses the collected job specialization and affiliation information to sort reporting data quarterly, especially total student attendance, student

attendance by each offered course, and student demographics and job affiliations (e.g., safety, health, and whistleblower investigator job titles).

**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 agency uses the information compiled from the Student Data Form (SDF or Form), developed by its Office of Training and Education, to demonstrate, in an accurate and timely manner, that it is providing the training and worker education mandated by Section 21 of the OSH Act. This information is also helpful in evaluating training, and in making decisions regarding program/course revisions, budget support, and tuition costs.

This form is used by non-Department personnel, including those in the private sector, for requesting information pertaining to enrollment in Institute courses. The information in the “Personal Data” and “Supervisor Data” categories allows OSHA to contact students if an emergency arises at their home, place of employment, or in local accommodations, and to alert supervisors of a trainee’s injury or illness.

**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 burdens.**

The Student Information form is located on the agency’s learning management system home page (located at <https://oshaelearning.geniussis.com/PublicWelcome.aspxhttps://oshaelearning.geniussis.com/PublicWelcome.aspx>). The registration form requires that the new user applicant provide information on their job specialization and affiliation and can be accessed through the button labeled “New User (other than federal OSHA).” The student selects the New User button to access all the necessary fields to create their account. After completing the data entry form, a notice is sent to agency administrative staff for electronic approval and ultimate account creation.

**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.**

The information collection requirements of the SDF are specific to each student involved, and no other source or agency duplicates these requirements or can make the required information available to OSHA (i.e., the required information is available only from the student).

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

The agency collects information as part of the training courses attended by students in their individual capacity; the information provided on the SDF has no direct impact on any business, regardless of its size. Accordingly, this paperwork requirement does not have a significant impact on a substantial number of small entities.

**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 specified in this requirement is the minimum the agency believes necessary to ensure proper compliance and monitoring methods are maintained. If OSHA could not collect the information provided on the SDF or obtained it less frequently, the agency would not have necessary and comprehensive data to use while documenting its timely and full compliance with section 21 of the OSH Act; planning timely program and course revisions, budget support, and tuition cost changes; and effectively managing student-related emergencies that may arise during training.

This information is also necessary to document student enrollments and to maintain the agency's Accredited Provider certification through the International Accreditors for Continuing Education and Training (Accreditation No. 1001788-4, Expires: March 31, 2027).<sup>1</sup>

**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;**

---

<sup>1</sup> The agency's Certification of Accreditation can be viewed through the International Accreditors for Continuing Education and Training (IACET) website (<https://www.iacet.org>). Under the "Affiliates" drop-down menu in the top banner, select "Accredited Provider's List. The agency is listed under "US Department of Labor, Occupational Safety and Health Administration (OSHA), Office of Training and Education (OTE)."

- **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 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.**

The agency believes that no special circumstances exist that would cause it to collect the information required by the SDF in a manner or using procedures that differ from the description provided in Item 2 above.

- 8. If applicable, provide a copy and identify the data 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.**

As required by the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the *Federal Register* on March 21, 2023 (88 FR 17026), soliciting comments from the public and other interested parties on the information collection requirements contained in the Student Data Form (Docket Number OSHA-2010-0022). The notice is part of a preclearance consultation program intended to provide those interested parties with an opportunity to comment on OSHA's request for an extension by the Office of Management and Budget (OMB) of a previous approval of the information collection requirement. This notice was a part of a preclearance consultation program that provides the general public and government agencies with an opportunity to comment.

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

OSHA will not provide payments or gifts to the student-respondents.

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

The agency has determined that none of the information collected in the SDF qualifies as confidential information, and accordingly provides no assurances of confidentiality.

**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 agency has determined that none of the information collected in the SDF qualifies as sensitive information.

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