

SUPPORTING STATEMENT, Part A  
Survey of Occupational Injuries and Illnesses

The purpose of this request is to obtain clearance for the Bureau of Labor Statistics (BLS) Survey of Occupational Injuries and Illnesses (SOII). The collection being submitted as a revision includes the following changes since the last submission:

1. Updated survey reference years on all forms
2. Moved the OMB number on all forms to the upper right-hand corner
3. For item 5 (2020 Prenote Leaflet and 2020 SOII Instructions Sheet – Mandatory Prenote):
  - a. Updated bulleted information of the front of the form to clarify instructions for respondents receiving the notification
  - b. Updated the chart on the back of the form with 2017 Survey data
4. For item 15 (2019 SOII Instruction Sheet for the DJTR, non-DJTR, and Volunteer forms):
  - a. Updated bulleted information on the front of the form to clarify instructions to respondents how to report their data
5. Item 16 (2019 Internet pamphlet):
  - a. Updated the chart on the form with 2017 Survey data
6. Item 24 (2020 Mandatory Pre-Notification-DJTR) was removed; this pilot collection will end following the 2019 survey year
7. More precisely identified and estimated burden for normally exempt establishments that are asked to record information for the SOII
8. Updated CIPSEA citations in the BLS Internet collection portal to reflect most recent language regarding cybersecurity
9. Requested approval to modify BLS Internet collection portal (IDCF) to implement a secure process to transfer data from OSHA ITA to IDCF as a means to decrease duplicative reporting burden

**A. Justification**

**1. Background.**

Section 24(a) of the Occupational Safety and Health Act of 1970 (the Act) requires the Secretary of Labor to develop and maintain an effective program of collection, compilation, and analysis of statistics on occupational injuries and illnesses. Section 24 also authorizes and encourages the Federal government to enlist the aid of states in developing and conducting statistical programs to meet the data needs of the states as well as its own. Sections 8(c)(1), (2), 8(g)(2), 24(a), and 24(e) of the Act specifically require the Secretary of Labor to design and implement a system requiring employers covered by the Act to maintain records of occupational injuries and illnesses and to submit periodic reports to the Secretary of Labor upon request.

In Secretary's Order No. 5-02, the Secretary of Labor delegated to the Commissioner of Labor Statistics the responsibility for "Furthering the purpose of the Occupational Safety

and Health Act by developing and maintaining an effective program of collection, compilation, analysis and publication of occupational safety and health statistics."

The Bureau of Labor Statistics (BLS) fulfills this responsibility by conducting the Survey of Occupational Injuries and Illnesses in conjunction with participating state statistical agencies. The survey reflects employers' incorporation of the Occupational Safety and Health Administration (OSHA) recordkeeping regulations that were implemented by the Department of Labor.

Included in this package are the following documents used in the data collection process for the Survey of Occupational Injuries and Illnesses (SOII):

1. The survey form – BLS 9300
2. The FAX form
3. Email notification messages
4. Notification letter and associated materials to be sent to all participants in the 2019 survey
5. Informed Consent letter
6. Voluntary letter for state and local government agencies
7. Nonresponse follow-up letters for mandatory and voluntary participants
8. Forms for pilot collection of case and demographic data for injury and illness cases

## **2. Uses of the Survey.**

The purpose of the Act, as stated in Section 2(b), is to assure, as far as possible, every working man and woman in the Nation safe and healthful working conditions. The BLS SOII provides the Nation's primary indicator of the progress towards achieving this goal. BLS is the principal Federal statistical agency responsible for measuring labor market activity, working conditions, and price changes in the economy. Its mission is to collect, analyze, and disseminate some of the nation's most sensitive and important economic data to support public and private decision-making. As an independent statistical agency, BLS serves the general public, the U.S. Congress, DOL and other federal agencies, state and local governments, and business and labor by providing data products that are accurate, objective, relevant, timely, and accessible, as well as providing technical assistance and consulting services. SOII's mission is to produce the estimates necessary for the safety and health community to save lives and reduce workplace injuries and illnesses. To that end, the survey measures the overall rate of occurrence of work injuries and illnesses by industry; and for the most serious cases by occupation, worker characteristics, and case circumstance.

Survey estimates are used by a wide range of stakeholders to assess the Nation's progress in improving the safety and health of America's work places; to prioritize scarce federal and state resources; to guide the development of injury and illness prevention strategies; and to support OSHA and state safety and health standards and research. These stakeholders include OSHA, the National Institute for Occupational Safety and Health (NIOSH), Congress, public policy analysts, state public health officials, safety and health advocates, researchers, and the media. Data are essential for evaluating the effectiveness of Federal and state programs for improving work place safety and health. For these reasons, it is necessary to provide estimates separately for participating states.

The SOII program is vital to the safety of America's workers. Without these necessary estimates, the safety and health community would be less able to focus on enforcement efforts, research prevention practices, and put in place mitigating strategies which lead to fewer occupational fatalities, injuries, and illnesses.

The Bureau of Economic Analysis uses the BLS injury and illness survey data to prepare the economic accounts of the United States. The survey information is used to estimate employer contributions for workers' compensation by industry. The workers' compensation contributions are a component of the employer contributions for social insurance and other labor income in the national income and product account.

NIOSH and the Council of State and Territorial Epidemiologists (CSTE) identified twenty-two occupational health indicators intended to improve the surveillance of workplace injuries and illnesses by state health agencies. Each health indicator is comprised of one or more frequency measures. The BLS SOII contributes three frequency measures to these health indicators.

The industry classifications for which data are produced reflect the incorporation of the North American Industry Classification System (NAICS) codes beginning with reference year 2003.

Beginning with survey year 2008, the SOII published national estimates of workplace injuries and illnesses sustained by state and local government workers, including those in such relatively high hazard and high profile occupations as police, firefighters, paramedics, and other public health workers. The BLS collects data from state and local government agencies in all states to support both state and national estimates. The BLS regards the collection of these data as a significant expansion in its overall coverage of the American workplace and it also provides some measure of response to critics who allege an undercount of injuries and illnesses in the survey. The BLS undertook research to investigate and to better understand the issues surrounding a potential underreporting and undercount of workplace injuries and illnesses. This multiyear research effort provided results in 2012 which were used to guide the selection of further research topics in 2013 to improve the completeness and accuracy of estimates from the SOII. The BLS continues to evaluate the results of completed and ongoing data quality research, including testing the feasibility of collection of injury and illness data directly from workers.

For the more serious injuries and illnesses, those with days away from work, the SOII provides detailed information on the injured/ill worker (age, sex, race, industry, occupation, and length of service), the time in shift, and the circumstances of the injuries and illnesses classified by standardized codes (nature of the injury/illness, part of body affected, primary and secondary sources of the injury/illness, and the event or exposure that produced the injury/illness). Race data categories reflect the Office of Management and Budget (OMB) recommended categories for non-self-reported classification. Optional information on the general job category is used to improve coding for non-descriptive job titles, such as "Customer Service Representative." A check-off for before/during/after work shift is included to identify the events that occurred before or after the work shift.

In the two decades prior to the OSHA recordkeeping changes in 2002, incidence rates for cases with days away from work decreased significantly while incidence rates for

cases with only restricted work activity increased significantly. Since the BLS previously collected case and demographic data only for cases with days away from work, data were not obtained about a growing class of injury and illness cases.

Beginning with the survey year 2011, BLS began testing the collection of case and demographic data for injury and illness cases that require only days of job transfer or restriction. The purpose of this on-going pilot study is to evaluate collection of these cases and to learn more about occupational injuries and illnesses that resulted in days of job transfer or work restriction.

For survey year 2019, case circumstance and worker characteristic data for days of job transfer or work restriction cases will be collected for the following six NAICS\* industry subsectors:

- Crop production (NAICS 111)
- Transportation equipment manufacturing (NAICS 336)
- Food and beverage stores (NAICS 445)
- Truck transportation (NAICS 484)
- Amusement, gambling, and recreation industries (NAICS 713)
- Food services and drinking places (NAICS 722)

BLS is analyzing the results of this test to determine how best to implement the collection of these data, as well as days away from work cases, in future survey years. BLS regards the collection of these cases with only job transfer or restriction as significant in its coverage of the American workforce. Industry subsectors were selected based on their days-of-job transfer-or-restriction incidence rate (and to some degree the number of cases) in years before the pilot study. Some industries were selected if the days-of-job transfer-or-restriction incidence rate was greater than or equal to the days-away-from-work incidence rate in the respective industry.

To retain the level of case and demographic characteristics estimates published currently for cases with days away from work and to publish similar estimates for cases with job transfer or restriction, a greater number of cases will need to be collected from employers. BLS has maintained the subsampling process for employers to limit to 15 the number of cases each employer needs to submit. BLS continues to examine this issue to determine an optimal number of cases to collect for each type of case while limiting the burden on the employer and the burden on the participating state agencies.

Employers covered under the Act are in one of two categories: (1) Employers who maintain OSHA records on a regular basis; and (2) employers who are normally exempt from OSHA recordkeeping. Each year a sample of exempt employers is required to keep records and participate in the SOII. In December, prior to the survey reference year, sampled employers who are normally exempt from recordkeeping will be notified by the BLS or participating state agencies to record their injuries and illnesses on the OSHA recordkeeping forms, which will be provided by the BLS. The BLS will also provide a courtesy copy of the required OSHA recordkeeping forms to all other survey participants for that reference year.

### **3. Use of technology to reduce employer burden.**

The survey's sample selection process employs stratified random sampling to reduce the burden on private sector establishments. The BLS Internet data collection facility (IDCF) was first introduced for the SOII in 2003, and is currently being used for the 2018

survey. The occupational safety and health statistical program also has used improved information technology, such as cognitive research, in efforts to reduce employer burden. Employers with large numbers of injuries and illnesses involving days away from work are asked to submit information on a probability sample of those cases. The IDCF permits incorporation of case subsampling for those respondents who have more than 15 cases. These respondents will be instructed to report a sample of cases occurring in a pre-specified time period. Starting with the test during the 2011 survey, with the additional collection of cases with only job transfer or restriction, this subsampling of cases continued to result in employers only having to submit 15 or fewer cases.

Beginning with the 2008 survey year, BLS sent the electronic data option collection form to all employers, except those in Puerto Rico who receive the Spanish language collection booklet. The initial tests encouraging the use of electronic data submission were conducted in the 2005 and 2006 survey years and were very successful, which led to further utilization of electronic collection options. The number of responses via the Internet rose from 29,551 establishments in the 2004 survey year to 124,088 in the 2008 survey year (all establishments had the option to respond electronically in 2008). Between these survey years, the number of days-away-from-work (DAFW) cases collected by the IDCF rose from 50,707 to 174,125 cases.

For the 2017 SOII, a total of 151,517 establishments with 196,014 cases involving days away from work, job transfer or restriction reported using IDCF, accounting for 76 percent of survey responses and 80 percent of reported cases. An additional 24,087 establishment responses were reported electronically via our keyed data file upload process, accounting for another 12.1 percent of responses for the 2017 SOII. As of May 22, 2019, a total of 141,896 establishments responded to the 2018 SOII via IDCF with 182,492 individual cases reported.

Employers will still have the option of requesting the hard copy version of the data collection form or the data collection FAX form.

Employers still may attach a copy of their OSHA 300A summary form to complete Part I of the survey when submitting the hard copy version of the data collection form. In addition, they will continue to be offered the option of attaching an alternative record that contains the requested worker and case circumstances information on the data collection case form. Alternative forms could be workers' compensation first report of injury forms, company accident reports, insurance forms, or the OSHA supplemental case form.

The survey allows respondents to opt in to receive by email the notification of the requirement to respond to the SOII. For the 2019 SOII, nearly 40,000 establishments were notified of their requirement to maintain injury and illness records required to respond to the SOII. And nearly 42,000 establishments were emailed during data collection processes for the on-going 2018 SOII. The respondent must make a positive selection to opt in for email notification; this selection will be retained. The BLS will email these respondents in subsequent years if the respondent is selected to participate in the survey. The email is pre-filled from the registration email but the respondent may change the email address at this time if desired. The survey will use email for notification of responsibility to participate in the survey as well as for data collection in accordance with BLS policy on the use of email for data collection.

#### **4. Efforts to identify duplication.**

As nearly all employers in the private sector are covered by the Occupational Safety and Health Act, the SOII is able to produce statistics for almost all industries by itself. However, to provide comprehensive, private sector estimates, it is necessary to secure data from other federal agencies having statutory authority affecting the safety and health of employees in coal, metal, and other nonmetal mining, and on railroads. Comparable data are provided by the Mine Safety and Health Administration, U.S. Department of Labor, for mining employers and by the Federal Railroad Administration, U.S. Department of Transportation, for railroad employers.

OSHA requires large establishments in manufacturing and from selected high-risk industries outside of manufacturing to record on paper logs and retain data similar to those collected by the SOII. OSHA requires establishment-specific data to target interventions such as inspections, consultations, and technical assistance.

The BLS collects information from OSHA logs from a sample of establishments representative of the entire U.S. economy, including establishments that maintain OSHA records on a regular basis (non-exempt) as well as establishments that are normally exempt from OSHA recordkeeping. The burden of recording information on the OSHA logs for those employers who normally must keep records is already reflected in OSHA's clearance. (Please see section 12 for additional detail on SOII burden for OSHA exempt and non-exempt establishments.)

Beginning with calendar year (CY) 2016, OSHA amended its recordkeeping regulations to require employers with 250 or more employees in all industries, and employers in certain industries with 20 to 249 employees, to submit 300A Summary form injury and illness information electronically to OSHA. OSHA developed the Injury Tracking Application (ITA) to electronically collect records. The OSHA rule did not add to or change any employer's obligation to complete and retain injury and illness records under OSHA's regulations for recording and reporting occupational injuries and illnesses, but it modified employers' obligations to transmit electronically information from these records to OSHA. Some establishments in private industry are required to report to both the SOII and OSHA under the ITA rule.

At the time that OSHA amended their recordkeeping rules, OMB requested that BLS evaluate using the OSHA-collected electronic injury and illness data as an input to SOII estimates. The OSHA rule, and therefore the data collected electronically by that rule, covers a subset of the US economy, necessitating the development of new methodologies to use the OSHA electronic data along with the SOII reported data to produce nationally representative estimates, while protecting the confidentiality of the SOII sampled establishments as required by the Confidential Information Protection and Statistical Efficiency Act (CIPSEA). Also, measuring nonresponse is critical to creating accurate and reliable estimates. The timing of the collection of the OSHA ITA records may pose challenges to incorporation of these records in SOII estimates.

OMB also requested that the BLS and OSHA work together as the ITA electronic data collection application was developed to minimize any increased burden on employers. From 2016 through February 2017, BLS and OSHA formed a working group to examine ways to reduce duplicative burden where possible. BLS and OSHA were largely able to align OSHA electronic collection with the SOII and BLS shared electronic data collection expertise. BLS continues to work closely with OSHA to inform on-going research efforts.

It is important to BLS that the identities of establishments are verified and that the record for each submitted establishment include the Employer Identification Number (EIN). The EIN is a critical element to assist matching the records collected by OSHA to the BLS establishment frame to appropriately incorporate these records into BLS estimates without creating bias. Without the EIN, the match becomes more complex, which can result in bias and loss of efficiency in estimates. In 2019, OSHA further amended their recordkeeping rules to require covered employers to submit their EIN electronically along with their injury and illness data submission for this purpose. OSHA will begin collecting EIN as early as 2020.

For survey year 2018, BLS began collecting the OSHA-assigned establishment identification number on a voluntary basis from SOII internet respondents required to submit data to OSHA and to BLS. This identification number will be used to improve matching OSHA data and BLS data. BLS and OSHA also continue to work together to explore technological solutions to reduce duplicative burden, including changes to the collection systems for both agencies and the possibility of data sharing from OSHA to BLS on a flow basis.

Following survey year 2018 SOII data collection, BLS analyzed SOII responses from establishments required to report both for the SOII and to OSHA ITA. Approximately 20 percent of SOII respondents, also required to report to OSHA ITA, voluntarily provided their OSHA-assigned establishment identification number upon request during 2018 SOII collection. Further analysis of data from these overlapping establishments demonstrated that BLS could often match establishment information between these two sources when these respondents accurately report their OSHA-assigned establishment identification number when reporting for the SOII. In such cases, BLS believes that a technological solution could be implemented that would aid in reducing reporting burden among some respondents who are required to report both for the SOII and to OSHA ITA.

BLS intends to pursue implementation of a technological solution with potential to reduce duplicative reporting burden resulting from OSHA ITA collection. To accomplish this, BLS requests permission to modify its IDCF application to implement a secure process to transfer data from OSHA ITA into IDCF as early as survey year 2019 collection. BLS will submit a non-substantive change request updating respondent burden and IDCF screens prior to implementation. For SOII establishments that BLS can definitively match to establishments that have previously reported summary records from the OSHA 300A to OSHA ITA, BLS will use those data to prepopulate related data fields in IDCF to reduce the duplicative reporting of data for the SOII. SOII respondents that have reported cases involving days away from work would then be required to report only detailed case information that OSHA does not collect. BLS has discussed this technological solution with OSHA, who supports the BLS efforts on these changes. BLS will continue to coordinate with OSHA on changes necessary for the successful implementation of a technological solution to reduce reporting burden.

The accuracy, integrity, and confidentiality of respondent data remains a critical priority for BLS. In order to ensure the accuracy and integrity of data necessary to produce statistically reliable estimates, BLS will use multiple criteria—for example, the OSHA-assigned establishment identification number, the Employer Identification Number (EIN, which OSHA will begin collecting as early as survey year 2019), and others—to ensure

a definitive match before OSHA ITA data are matched to SOII respondents. BLS will also ensure that the design of this technological solution safeguards the confidentiality of SOII respondents. Design features of this technological solution will include unidirectional transfer of data from OSHA ITA to BLS. BLS believes that the pledge of confidentiality to ensure the use of respondent data only for statistical purposes is essential to fostering a willingness among respondents to share their data. BLS will adhere to all existing confidentiality protections described in the section on Confidentiality below for the implementation of this technological solution. Data collected from SOII respondents will neither be accessible to or shared with OSHA.

BLS continues to examine the use of administrative data in combination with survey collected data to produce estimates. As part of this effort, BLS is reviewing all available OSHA collected electronic data, including data collected from the ITA as well as data from OSHA's severe injury tracking system. Initial research linking the SOII sample frame to OSHA severe injury data suggests that linkage would benefit from additional information such as EIN. Additionally, key data elements such as industry may appear differently in the SOII and OSHA records, suggesting some challenges in combining the two data sources. Additional work linking SOII data to currently available OSHA collected records is ongoing. Also, BLS has funded research to develop proposals to combine OSHA records with SOII data. A final report on proposed methodology is being prepared and reviewed by BLS researchers.

Summary records from the OSHA 300A form for CY2016 became available in December 2017. The deadlines for submission of the OSHA 300A form were advanced to July 2018 for CY2017 data. And beginning with CY2018 forward, the deadline for submission of OSHA 300A data is March 2 of the following year. The final OSHA rule eliminated the requirement that covered establishments submit case-specific information electronically from their OSHA Forms 300 and 301. Detailed case data collected by the SOII are critical to continuing to produce the data series that are available only from the BLS SOII.

Given the uncertainty surrounding what OSHA collected data will look like in the next few years and the challenges BLS faces in defining methodologies to utilize OSHA data, BLS requests that SOII be granted a 3-year clearance. BLS will continue its research to evaluate using OSHA-collected ITA data as an input to SOII estimates.

The BLS injury and illness survey data are collected under a pledge of confidentiality and are used only for statistical purposes.

The work injury and illness data to be collected in the survey are not available from any other source. The only existing large body of work on work injury and illness information is located in workers' compensation programs; however, many states do not include all of the specific kinds of work-related cases which the Act requires employers to record and to report.

Additionally, coverage and reporting differences among states and lack of uniformly complete records prevent the workers' compensation programs from providing statistically accurate data for national estimates. Workers' compensation data also do not provide a measure of the severity of the injury or illness, such as the number of days away from work, and many are missing the OSHA required data elements such as time of event. Therefore, data from state workers' compensation programs cannot serve as a replacement for the annual survey.

Since employers may have recorded demographic and injury/illness circumstances information on a workers' compensation first report of injury/illness form, company accident report, or other document, the survey form allows employers to attach copies of these documents in lieu of entering responses to covered questions on the survey instrument.

#### **5. Minimizing small employer burden.**

The BLS minimizes the burden upon small employers by using a highly efficient stratified random sampling plan. Under this sampling plan, the smaller employment units within an industry have a lower probability of selection. In addition, using the electronic data collection option enables small employers with no days-away-from-work cases to simply enter information from the summary form for the survey on the Internet which completes their response.

#### **6. Consequence of less frequent collection.**

Operational and budgetary issues, along with the data uses described above, make collecting survey data annually essential. The annual survey is a cooperative program with state agencies, which are partially funded by the federal government to collect and process the survey data. States share the data with the BLS for generating national estimates. State grant agencies must finance half the costs by appropriation requests to their own state legislatures, many of which convene and appropriate funds over a cycle that may be different from the federal budget cycle. Therefore, it is likely that many states would be unable to participate in a program of less frequent scheduling. If states do drop out, the federal government needs to assume the collection of the data at an increased cost. In addition, the complex data collection and coding activities require a fully trained staff. With less frequent collection, and the associated unbalanced workloads, states would be unable to maintain the skilled staff needed to implement the survey.

At a joint meeting of the Occupational Safety and Health Statistics Committee of the Labor Research Advisory Council (LRAC) and the Business Research Advisory Council (BRAC) on August 4, 1977, a resolution was adopted opposing a change in the frequency of the survey. The resolution asserted that a less frequent survey would be "less responsive to the needs and considerations of the profession, Congress, and the public if carried out at less frequent periods."

#### **7. Special Circumstances affecting Collection.**

Survey data are collected once annually. Respondents have thirty days to complete survey forms and no additional copies are required. The BLS does not require survey record retention for respondents.

The survey provides valid and reliable estimates that reflect the worker injury and illness experience for the universe of private sector employers. Incident information for days away from work injuries and illnesses is classified by the BLS and participating state agencies using the BLS Occupational Injury and Illness Classification Structure which was submitted to OMB with the initial program redesign clearance in 1991.

## **8. Federal Register Notice and Outside Consultation.**

### **Federal Register Notice.**

No comments were received on the Federal Register notice published in 84 FR 27806 on June 14, 2019.

### **Consultations.**

Semiannually, the BLS meets with both the Data Users Advisory Committee and the BLS Technical Advisory Committee to review programs and to solicit advice and recommendations for program enhancement. The BLS also meets periodically with the Federal Economic Statistics Advisory Committee.

The BLS holds periodic conferences with the state agencies which receive grants to conduct the survey.

The BLS meets periodically with representatives of the OSHA and NIOSH.

## **9. Payments or Gifts.**

No payments or gifts are provided to respondents.

## **10. Confidentiality.**

The Confidential Information Protection and Statistical Efficiency Act (CIPSEA) safeguards the confidentiality of individually identifiable information acquired under a pledge of confidentiality for exclusively statistical purposes by controlling access to, and uses made of, such information. CIPSEA includes fines and penalties for any knowing and willful disclosure of individually identifiable information by an officer, employee, or agent of the BLS.

Based on this law, the BLS provides respondents with the following confidentiality pledge/informed consent statement:

*The Bureau of Labor Statistics, its employees, agents, and partner statistical agencies, will use the information you provide for statistical purposes only and will hold the information in confidence to the full extent permitted by law. In accordance with the Confidential Information Protection and Statistical Efficiency Act (44 U.S.C 3572) and other applicable Federal laws, your responses will not be disclosed in identifiable form without your informed consent. Per the Cybersecurity Enhancement Act of 2015, Federal Information systems are protected from malicious activities through cybersecurity screening of transmitted data.*

BLS policy on the confidential nature of respondent identifiable information (RII) states that "RII acquired or maintained by the BLS for exclusively statistical purposes and under a pledge of confidentiality shall be treated in a manner that ensures the information will be used only for statistical purposes and will be accessible only to authorized individuals with a need-to-know."

The 2019 reporting form, BLS No. 9300, and the related Internet data collection site, will carry the confidentiality statement referenced above.

State and territory statutes vary—for example, in New Jersey, Maine, Wisconsin, Illinois and Guam—and allow the disclosure of state and local government records. Therefore the BLS does not pledge confidentiality to the state and local government units included in their samples.

**11. Sensitive questions.**

The name of the worker is obtained and used to facilitate recontacts with employers when data clarifications are required. The name of the worker will be deleted from the files as soon as the government wide restrictions from the Justice Department are removed.

The race of the injured/ill worker is requested at the option of the respondent. This information can be used to analyze workplace injury and illness rates by race and to compare to health information by race from other sources.

**12. Estimation of respondent burden.**

Multiple factors contribute to the estimate of employer burden for the survey. First, the BLS individual case recording burden estimates are consistent with the burden estimates used by OSHA. Second, the 'Total Hours Worked' and the 'Employment Average' data elements requested in our Survey form 9300 are required on the OSHA Summary form 300A and is a simple transfer of data to the BLS form. Therefore, the burden of calculating hours and employment for those employers who normally must keep the OSHA 300A is already reflected in OSHA's burden hours.

**Reporting Burden for the SOII Survey Data Collection (Form 9300).**

As noted above, with the implementation of the OSHA Summary Form 300A, the completion of the SOII requires transferring totals or photocopying the summary form for Part 1 of survey form 9300. The BLS estimates each of the 232,400 sample units will spend an average of 10 minutes to complete Part 1 of the form. Therefore, the total burden for Part 1 of the form is 38,733 hours [(232,400 sample units x 10 minutes)/60 = 38,733 hours].

**Table 1.** Reporting Burden for Form 9300 – Part I

Sector	Sample units	Hours
Private	211,800	35,300
Public (mandatory)	14,400	2,400
Public (voluntary)	6,200	1,033
Total	232,400	38,733

In Part 2 of the form, a burden allowance is provided to permit respondents to report up to 300,000 days-away-from-work cases and days-of-job-transfer-or-restriction pilot cases. The respondent copies the occupation and number of days away from work for each sampled injury/illness from the corresponding line of their Log of Work-Related Injuries and Illnesses. The other required information about the injured/ill worker and the incident is generally available from a workers' compensation report, a company accident report, an insurance form, or the OSHA supplemental case form. The employer is given

the option of attaching such a document in lieu of copying the data to the data collection form. The questions on race and type of job are optional. With an average burden of 10 minutes per case, the total burden for Part 2 is 50,000 hours [(300,000 cases x 10 minutes)/60 = 50,000 hours].

**Table 2.** Reporting Burden for Form 9300 – Part II

Sector	Days away from work cases and days of job transfer or restriction pilot cases	Hours
Private	255,000	42,500
Public (mandatory)	37,500	6,250
Public (voluntary)	7,500	1,250
Total	300,000	50,000

The BLS further estimates that the approximately 92,000 private sample units and 13,000 public sector units that have responsibility to report to OSHA and to the BLS will spend approximately 2 minutes on average reporting the OSHA ITA establishment identification number. With an average burden of 2 minutes to report the OSHA ITA establishment identification number, the total burden for this element is 3,501 hours [(105,000 sample units x 2 minutes)/60 = 3,501 hours].

**Table 3.** Burden to Report EIN

Sector	Sample Units	Hours
Private	92,000	3,067
Public (mandatory)	13,000	434
Total	105,000	3,501

Total burden for the survey data collection Form 9300 is, therefore, 92,234 hours (38,733 + 50,000 + 3,501). The average reporting burden is then 24 minutes or 0.4 hours per respondent (92,234 hours/232,400 sample units = 0.4 hours per sample unit).

**Table 4.** Total Reporting Burden for the SOII

Sector	Hours
Private	80,867 (35,300 + 42,500 + 3,067)
Public (mandatory)	9,084 (2,400 + 6,250 + 434)
Public (voluntary)	2,283 (1,033 + 1,250)
Total	92,234

**Recording Burden for SOII Pre-notification Recording.**

Recording burden for normally exempt employers who are pre-notified to keep records for a survey year is 102,826 hours. The BLS is using the OSHA estimate stated on the Log (OSHA form 300) that each new entry on the Log requires, on average, 14 minutes. OSHA estimates that completion of the OSHA Injury and Illness Incident Report (OSHA form 301) will require, on average, 22 minutes. OSHA further estimates that completion of each summary form (OSHA form 300A) will require, on average, 58 minutes.

**Table 5.** Recording Burden for Form 9300 – Part I

Sector	Sample units	Hours
Private	80,000	77,333

Public (voluntary)	6,200	5,993
Total	86,200	83,326

The BLS sample will include approximately 80,000 normally exempt private sector employers. It is expected that they will record approximately 25,000 cases on the Log form for a total burden of 5,833 hours [(25,000 cases x 14 minutes)/60 = 5,833] and on the OSHA Injury and Illness Incident Report for 9,167 burden hours [(25,000 cases x 22 minutes)/60 = 9,167]. All 80,000 normally exempt prenotified employers will need to complete the 58 minute summary form for a burden of 77,333 hours [(80,000 sample units x 58 minutes)/60 = 77,333]. The total recordkeeping burden for this normally exempt group of employers will be 92,333 hours (5,833 + 9,167 + 77,333).

**Table 6.** Recording Burden for Form 9300 – Part II

Sector	Days away from work cases and days of job transfer or restriction pilot cases	Log hours	Incident report hours
Private	25,000	5,833	9,167
Public (voluntary)	7,500	1,750	2,750
Total	32,500	7,583	11,917

**Table 7.** Total Recording Burden for the SOII Pre-Notification

Sector	Hours
Private	92,333 (5,833 + 9,167 + 77,333)
Public (voluntary)	10,493 (5,993 + 1,750 + 2,750)
Total	102,826

The BLS sample will include approximately 6,200 normally exempt public sector employers. The estimate for state and local government agencies will increase recording burden by 10,493 hours; (6,200 sample units x 58 minutes)/60 = 5,993 hours; (7,500 cases x 14 minutes)/60 = 1,750 hours; and (7,500 cases x 22 minutes)/60 = 2,750 hours. 5,993 + 1,750 + 2,750 = 10,493 hours. The burden estimates are stated on the OSHA forms that will be provided to employers.

**Total SOII Burden.**

Combined burden for recording (102,826) plus reporting (92,234) on the BLS Form 9300 is 195,060 hours.

**Table 8.** Total SOII Recording and Reporting Burden

Sector	Sample units	Hours
Private	211,800	173,200 (35,300+42,500+3,067+92,333)
Public (mandatory)	14,400	9,084 (2,400+6,250+434)
Public (voluntary)	6,200	12,776 (1,033+1,250+10,493)
Total	232,400	195,060

**SOII Burden Hours for SY2019 through SY2021.**

**Table 9.** SOII Burden Hours, SY2019-2021

Year	Sector	Reporting	Recording	Total Burden	Total cost
2019	Private	80,867	92,333	173,200	\$ 4,589,800
	Public (m)	9,084	--	9,084	\$ 240,726
	Public (v)	2,283	10,493	12,776	\$ 338,564
	Total	92,234	102,826	195,060	\$ 5,169,090
2020	Private	80,867	92,333	173,200	\$ 4,589,800
	Public (m)	9,084	--	9,084	\$ 240,726
	Public (v)	2,283	10,493	12,776	\$ 338,564
	Total	92,234	102,826	195,060	\$ 5,169,090
2021	Private	80,867	92,333	173,200	\$ 4,589,800
	Public (m)	9,084	--	9,084	\$ 240,726
	Public (v)	2,283	10,493	12,776	\$ 338,564
	Total	92,234	102,826	195,060	\$ 5,169,090

Respondent cost for the SOII (Private sector) is estimated at \$4.590 million based on an employer cost of \$26.50 an hour (173,200 \* \$26.50 = approximately \$4.950 million). With the addition of state and local government units, this respondent cost is estimated at \$5.169 million based on an employer cost of \$26.50 an hour (195,060 \* \$26.50 = approximately \$5.169 million). The employer cost is based on employer costs for wages, salaries, and employee benefits for sales and office workers reported by the BLS in: Employer Costs for Employee Compensation—December 2018, USDL-19-0449.

**13. Annual cost burden to respondents.**

Respondents are provided all materials needed to complete the survey. No capital costs or startup costs are incurred in the recordkeeping or reporting functions of this survey. The costs of generating, maintaining, and disclosing the information requested are direct burden hours as specified in item 12. The recordkeeping practices require only manual recording of information, thereby, no systems work would be required. Employers who have chosen to keep records electronically need only access them for survey purposes.

**14. Cost to the Federal government.**

Collection costs for the survey are funded on a 50/50 federal-state matching basis. The federal share of survey collection costs in Fiscal Year (FY) 2019 is around \$5.5 million, an amount that is being matched by participating states. In addition, approximately \$16.6 million in FY 2019 non-collection expenses is being incurred by the BLS, for the purpose of providing and maintaining the computers, telecommunications capacity, and software needed to capture the data, as well as retaining the staff who refine the design of the survey, select new survey samples each year, maintain data quality standards, produce and distribute estimates to the states, and publish the national data, as well as other related activities.

**15. Change in burden hours.**

There was a net decrease in burden of 123,941 hours (195,060 - 319,001). OSHA's transition from SIC to NAICS allowed the BLS to more precisely identify normally exempt establishments that are asked to record information for the SOII.

**16. Tabulation/publication timetable.**

Results from the survey are published in a news release. Data also are published in the President's Report on Occupational Safety and Health, an annual report to the U.S. Congress. Survey data also are available on the Internet. The SOII news release presenting industry rates and counts, as well as characteristics of injured/ill workers, is released in November.

Listed below is a summary timetable that identifies the major collection phases and tentative dates for publishing the data.

**Table 9.** Summary Timetable for Major SOII Collection Phases

December/January	Pre-notification mailing
January	Initial mailing of BLS No. 9300 forms to sample units
March	Second request mailing to nonrespondents
April	Third request mailing to nonrespondents
May	Telephone, mail, or email follow-up of key nonrespondents
July	Active collection of data closed
November	SOII news release highlighting industry rates and counts, as well as characteristics and circumstances of work place injuries and illnesses

**17. Display of expiration date.**

The BLS requests an exemption from the display of the expiration date on the BLS 9300 survey form. This allows for a savings in printing costs by providing the printer with final forms at an earlier date.

**18. Exceptions to certification.**

No exceptions to the certification statement are requested.