

EARN 2007 Survey SUPPORTING STATEMENT

A. Justification

A.1 Need for Information

The U.S. Department of Labor, Office of Disability Employment Policy (ODEP), under the Omnibus Appropriations Resolution, 2003, Public Law 1087; Consolidated Appropriations Act, 2001, Public Law 106-554, 29 U.S.C. 557b, proposes to conduct a survey of employers' perceptions on the employment of people with disabilities. The proposed survey of employers will build on the findings of previous employer surveys, with an emphasis on current attitudes and practices of employers in 12 industry sectors, including some high growth industries as projected by the Bureau of Labor Statistics (BLS). ODEP is also interested in understanding employers' perspectives about disability employment by company size and individuals at different levels organizationally within a given employer (e.g., Executive, Human Resources and Equal Employment Opportunity, front line supervisor or manager). The survey will be conducted by telephone by a survey firm utilizing computer assisted telephone interviewing (CATI) capability.

Previous surveys have documented employer response to the Americans with Disabilities Act and have identified barriers that employers experience or believe they will encounter in recruiting, hiring, retaining, and promoting workers with disabilities. For example, a recent telephone survey of 502 randomly selected private sector employers asked about employer views on people with disabilities in the workplace, accommodations, and economic issues. (*Restricted Access: A Survey of Employers about People with Disabilities and Lowering Barriers to Work*, March 2003, Rutgers, NJ: The John J. Heldrich Center for Workforce Development). There are several findings from the *Restricted Access* survey that need clarification and explanation. For example, when employers were asked what the greatest barrier to hiring persons with disabilities was, 32% of employers said the nature of work is such that people with disabilities cannot effectively perform it, while 22% answered they didn't know. In another study, *Disability Employment Policies and Practices in Private and Federal Sector Organizations*, (2000) Cornell University found that 22% of employers identified attitudes and stereotypes as a significant barrier to employment for people with disabilities. In order to increase employment opportunities for persons with disabilities, it is important to know whether these beliefs are more prevalent in certain industries, vary by company size, or for certain job functions. The proposed survey will build on previous efforts and will focus on industry segments and company size to ask more detailed questions. The strength of this survey is its emphasis on a comprehensive sampling of industry sectors, including some high growth industries, company size, and individuals at different levels organizationally within a given employer (e.g., Executive, Human Resources and Equal Employment Opportunity, front line supervisor or manager). The survey will fill in current gaps in the research literature regarding employer perspectives on the employment of people with disabilities that are critical to meeting ODEP's mission to develop and influence disability employment policy and promote effective practices.

A recent literature review by ODEP revealed the following weaknesses in the methods utilized in the research:

- Definition of employer. The definition varies in the literature, with most articles defining the term to cover the pool of respondents utilized in the specific study.

- Policy and action disconnect. Many surveys do not connect the responses provided with the actions undertaken by employers. For example, some surveys ask about company policies but neglect to ask if and how the policies are implemented.
- Industry sectors. Little data exist to substantiate a comparison of practices between industries.
- High growth industries. Little research has been conducted on companies in rapidly growing industries. There is a high likelihood that an interest in recruiting employees with disabilities may exist in these industries.
- Company size. Little research has compared employer perspectives on the employment of people with disabilities based on company size.

ODEP concluded that the research on employer perspectives on employing people with disabilities needs a strategic and scientifically based approach that rigorously collects and aggregates data from multiple types of employers. The proposed survey is designed to meet those needs.

1. **Definition of employer.** We define the employer as the individuals at different levels organizationally within a given employer we are surveying: Executive, HR, EEO, front line supervisors, and managers.
2. **Organizational leadership level by industry sector.** We can also compare leadership levels across high growth companies and industries.
3. **Policy and action disconnect.** Questions are designed to ask about company policy and how the policies are implemented.
4. **Company size.** We can also compare perspectives according by company size.
5. **Industry sectors.** Sampling by industry sector will allow a comparison of practices among industries, including some high grow industries identified by the BLS and the President's High Growth Job Training Initiative:

- Construction
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information
- Financial activities
- Professional and business services
- Education and health services
- Leisure and hospitality
- Other services
- State and local government
- Manufacturing

A.2 Use of the Information

Results from the proposed survey will provide ODEP with new knowledge on employer perspectives on employing people with disabilities, and the effective policies and practices that influence the employment of people with disabilities. With this information, ODEP can better formulate targeted strategies and policies for increasing the employment of persons with disabilities. While ODEP has conducted focus groups with high level executives, this survey will provide detailed and comprehensive data on employer attitudes and practices regarding hiring, recruitment, and retention for the industries involved. To ODEP's knowledge, such data is not currently available from any other source.

A.3 Use of Information Technology to Reduce Burden

There is no available technology per se that will limit respondent burden for the business surveys. Through use of electronic media to conduct the surveys is possible, it would not be appropriate with senior level industry executives. The proposed telephone survey will be brief. The survey will be conducted over the telephone, using Computer Assisted Telephone Interviewing (CATI), and many of the questions are closed-ended to further reduce respondent burden. Respondents' names and telephone numbers will be downloaded into the CATI sample management software module. Survey data are entered directly into the CATI system as the telephone interview is taking place. The use of CATI enables precise sample management and fast turnaround of data.

A.4 Efforts to Identify and Avoid Duplication and Ease Respondent Burden

Every effort has been made to avoid duplication and reduce respondent burden. This effort does not duplicate information already collected by ODEP, nor does it duplicate information currently being collected. There is no information available elsewhere that can be used to examine and compare employer attitudes and practices in high growth industries regarding opportunities for persons with disabilities. Efforts to identify duplicate sources of information included a review of recent literature and surveys.

The survey will be conducted using Computer Assisted Telephone Interviewing (CATI). CATI takes the interviewer to the next correct question, thus reducing the time needed to administer the questionnaire. The proposed questionnaire and contact procedures have been designed in a way that minimizes respondent burden. For instance, responses to many of the questions are closed-ended. The questionnaire will be pre-tested, and further adjustments will be made to the questionnaire, based on the pre-test results.

A.5 Minimizing Burden on Small Entities

The data sources affected by the study covered by this request for review will be private employers. We have designed the sample to minimize the burden on the employers. The survey is administered as a telephone interview that will take approximately 20 minutes.

A.6 Consequences of Less Frequent Data Collection

This data collection will inform ODEP in developing and promoting policies and effective practices to encourage and support employers in recruiting, hiring, retaining and advancing persons with disabilities. Without the information provided by this survey, ODEP will be limited in their ability to develop appropriate supports for potential employers of persons with disabilities. If this information is not collected, ODEP will lack information on the needs and concerns of potential employers of people with disabilities in high growth industries. With this information, ODEP can better formulate targeted strategies and policies for increasing the employment of persons with disabilities, which is critical to ODEP's mission. The survey scope and burden have been reduced as much as possible without sacrificing the statistical value of the information to be collected.

A.7 Special Circumstances

The data collection effort will be conducted according to the guidelines specified in 5 CFR 1320.5. No special circumstances are known that would cause inconsistency with these guidelines.

A.8 Federal Register Notice and Consultation Outside the Agency

As required by 5 C.F.R. § 1320.8(d), ODEP will publish a notice seeking public comment on the proposed collections of information. Consistent with the requirements of the Paperwork Reduction Act, the survey instrument used to study employers attitudes toward employing, advancing and retaining persons with disabilities will be made available to interested parties upon request to ODEP staff.

The initial notice requesting comments appeared on pages 9779-9780 of the March 5, 2007 edition, Volume 72, Number 42 of the Federal Register.

From May through October 2004, ODEP through the Employer Assistance and Recruiting Network (EARN) conducted focus group research in 13 major metropolitan areas. The 26 total groups represented a range of industry sectors and sizes, including for- and not-for-profit organizations, as well as executive-level managers and human resources professionals. The results of the focus groups were used in the development and design of the proposed survey. The focus group research report is located at http://www.dol.gov/odep/categories/research/EARN_report.doc.

ODEP has contracted with CESSI to obtain their views on the availability of data, the frequency of data collection, the content of questionnaires, data elements, and other issues. The survey instrument for this proposed information collection is based on the input of focus group participants.

A.9 Renumeration

Not applicable. No payments or gifts will be provided to respondents.

A.10 Assurances of Confidentiality

Confidentiality is an important part of the study design. In response to this concern, CESSI's subcontractor, Westat, the firm that will be conducting the telephone surveys, will ensure the confidentiality of all individuals who provide data. A pledge of confidentiality is a major positive incentive for potential respondents to participate in the study. Its absence would be a significant deterrent and could create complications in implementing the study. Westat will take the following precautions to ensure the confidentiality of all data collected:

- All Westat staff, including analysts, coders, editors, and keypunchers, will be instructed in the confidentiality requirements of the study and will sign statements affirming their obligation to maintain confidentiality;
- Information will be reviewed and data will be cleaned only by Westat staff;
- Data files that are delivered will contain no personal identifiers for program participants; and
- Analysis and publication of study findings for the participant survey will be in terms of aggregated statistics only.

The confidentiality agreement is mandatory for all Westat staff. This agreement requires the signer to keep confidential any and all information about individual respondents to which they may gain access. Any Westat employee who violates this agreement is subject to dismissal and to possible civil and criminal penalties.

A.11 Sensitive Information

The telephone survey of businesses does not entail responses to sensitive issues. The study will ask the opinions of the respondents about recruiting and hiring employees with disabilities. The survey interviewers will assure respondents that their answers will not be connected with their names or with the businesses for which they work, and that all results will only be reported in statistical totals.

A.12 Hour Burden of Information Collection to Respondents

The cost to respondents who participate in the pilot study will be in terms of their time only. The pilot of the survey instrument will include follow up questions and probing. Therefore, it will take about .1/2 hour. Based on the valuation of a participant's time at \$60 per hour for a senior executive, the respondent burden for each participant will be \$30.00 for the pilot study.

The cost to respondents who participate in the study will be in terms of their time only. The survey instrument takes about 1/4 hour. Based on the valuation of a participant's time at \$60 per hour for a senior executive, the respondent burden for each participant will be \$15.00 for survey. Exhibit A-1 presents the estimated hour and annual cost response burden for respondents.

Exhibit A-1. Estimated Hour and Annual Cost Response Burden

Data collection activity	Number of respondents	Responses per respondent	Hours per response	Annual burden hours	Annual burden (cost)
Pilot study	9	1	.5	4.5	\$270
Survey of senior executives	3600	1	.25	900	\$54,000
Total	3609	1	.75	904.5	\$54,270

A.13 Provide an Estimate of the Total Annual Cost Burden to Respondents or Record keepers Resulting From the Collection of Information

Total annual cost burden excluding respondent time is zero (see Exhibit A-1).

A.14 Annual Cost to the Federal Government

The overall cost of this research to the Federal Government is presented in Exhibit A-2.

Exhibit A-2. Overall Cost to the Federal Government

Category	Costs
Personnel (plus consultants)	\$223,762
Local travel	\$231
Telephone (long-distance telephone survey)	\$46,177
Other direct	\$35,746
Total direct charges (per contract)	\$269,338
Total	\$575,254

A.15 Program Changes

This is a new collection of information.

A.16 Plans for Publishing

The research team will describe the concerns employers have about the employment of persons with disabilities, and how ODEP’s policies can help employers address those concerns. The study will also provide information on steps employers have taken to recruit and hire persons with disabilities, as well as retain and promote those employees. The survey will inform disability employment policy and practice by comparing perspectives of senior executives in firms of varying size and industry sectors, including some of the fastest growing industries in the United States (see section A.1 for a list of the target industries for the study). The results will inform the development of ODEP’s programs and policies.

The timetable for the survey is shown in Exhibit A-3.

Exhibit A-3. Data Collection Timetable

Data collection activity	End dates
Pilot study	1 months after OMB clearance
Telephone survey of participants	6 months after OMB clearance
Data editing, coding and key entry	8 months after OMB clearance
Final report	15 months after OMB clearance

A.17 Display of Expiration Date of OMB Approval

The Office of Disability Employment Policy (ODEP) is not seeking an exemption from displaying the expiration date of OMB approval.

A.18 Exception for Item 19, “Certification for Paperwork Reduction Act Submissions.” of OMB Form 83-I

ODEP is not requesting any exceptions from OMB Form 83-I.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

B.1 Respondent Universe and Sampling Methods

The target population of this survey includes all employers with at least five employees in 12 industries in the U.S. The firms with fewer than five employees are excluded from the target population.

The sample will be obtained by drawing an equal probability systematic sample of companies within each of the 36 size by industry sector strata. The sample selection will be independent across the strata. Within each stratum, the frame units will preferably be placed in a sort order by Census region and within region by the number of employees in the company. This implicit stratification ensures the geographical dispersion among the sample companies and increases the probability that a range of company sizes within a stratum, are selected.

B.2 Procedures for the Collection of Information

B.2.1 Introduction

The Office of Disability Employment Policy (ODEP) needs data on the employers' perspectives on the employment of people with disabilities collected with scientifically based methods from various types of employers. ODEP plans to use the data to formulate targeted strategies and policies for increasing the employment of persons with disabilities. Various industry sectors provide opportunities to increase the employment of persons with disabilities. ODEP would like to be able to make comparisons among the industry sectors, including high growth industries. The objective of this survey is to meet these data needs of ODEP to inform the development and promotion of policy and practice.

B.2.2 Data Collection Procedures

This activity entails conducting a 15-minute telephone survey of a representative sample of senior executives representing 12 industries by company size [small (5-14 employees), medium (15-249 employees), and large companies (250 or more employees)]. Westat will conduct interviews with 3,600 respondents. The industries are:

1. Construction
2. Wholesale trade
3. Retail trade
4. Transportation and warehousing
5. Information
6. Financial activities
7. Professional and business services
8. Education and health services
9. Leisure and hospitality

10. Other services [Establishments in this sector are primarily engaged in activities, such as equipment and machinery repairing, promoting or administering religious activities, grantmaking, advocacy, and providing dry cleaning and laundry services, personal care services, death care services, pet care services, photofinishing services, temporary parking services, and dating services.]
11. State and local government
12. Manufacturing

B.2.3 Sampling Plan

B.2.3.1 Sample Design

The survey will utilize a stratified random sample design. Larger companies will be oversampled, but all companies will be selected with equal probability within each stratum. This section describes the sample design. It includes a description of the sampling frame, precision requirements and sample size, stratification, and sampling selection.

B.2.3.2 Sampling Frame

The sampling frame for the survey will be the Duns Market Identifiers (DMI) register maintained by Dun & Bradstreet (D&B). DMI is a file produced by D&B, Inc., contains basic company data, executive names and titles, mailing and location addresses, corporate linkages, D-U-N-S numbers, employment and sales data on over 10 million U.S. business establishment locations, including public, private, and government organizations. DMI is the single comprehensive publicly available database to provide coverage of business establishments. An alternative comprehensive database is BusinessUSA, however it does not provide corporate linkages and only a small number of records can be accessed at a time and thus it is not convenient for drawing random samples. Other alternative databases are generally restricted to certain sectors.

DMI's coverage of the target population is relatively complete. A Westat study found that its coverage of establishments is high, near 98 to 99 percent, and its coverage of the new establishments is also good. About one-half of new establishments are included on the list within the first year (Marker et. al., 1997).

The sampling frame records will contain the following fields from DMI: a D-U-N-S number; North American Industry Classification System (NAICS) code or Standard Industrial Classification (SIC code); FIPS State code; SMSA code; number of employees at the location; total number of employees for the entire organization; status indicator, i.e., single location, headquarters, or branch; a subsidiary indicator; D-U-N-S numbers of the domestic topmost firm, headquarters, and parent (if a subsidiary); a hierarchy code to identify its location within the corporate structure; and DIAS code.

Employer policies and practices on the employment of people with disabilities may vary among large firms. Some may be highly centralized; others may have separate policies in branches. DMI provides the option of choosing alternative organizational levels. The DMI list includes both headquarters and branch level records. DMI defines a headquarters as a business establishment that has branches or divisions reporting to it, and is financially responsible for those branches or divisions. We will include only the headquarters record for those companies with multiple branches. Therefore, the sampling units will be the single location (a business establishment with no branches or subsidiaries reporting to it) companies and the headquarters of the companies that have multiple branches. The headquarters record will provide the

total number of employees for the company, including the employees in the branches. Another corporate family linkage relationship provided by DMI is the subsidiary to parent linkage. A subsidiary is a corporation with more than 50 percent of its capital stock is owned by another corporation and will have a different legal business name from its parent company. The subsidiaries and parent companies will be included as separate sampling units.

B.2.3.3 Precision Requirements and Sample Size

The domains of the population of interest for the survey are based on company size classes within the major industry sectors. The twelve industry sectors and their definitions in terms of 2002 NAICS codes are shown in Table B.1.

The size classes are small, medium, and large. The size classes will be based on the number of employees of the company. A uniform set of size class boundaries can be used for all industry sectors, e.g., small (5-14 employees), medium (15-249 employees), and large companies (250 or more employees). However, size distribution of the companies may vary considerably across the major industry sectors. Consequently, optimal size strata boundaries can differ across the industries substantially. There are a total of 36 (three size classes within 12 sectors) domains of interest.

Table B.1. Definition of Major Industry Sectors by 2002 NAICS Codes

Industry Sector	2002 NAICS
Construction	23: Construction
Manufacturing	31-33: Manufacturing
Wholesale Trade	42: Wholesale Trade
Retail Trade	44-45: Retail Trade
Transportation and Warehousing	48: Transportation 492: Couriers & Messengers 493: Warehousing & Storage
Information	51: Information
Financial Activities	52: Finance and Insurance 53: Real Estate and Rental and Leasing
Professional & Business Services	54: Professional, Scientific, and Technical Services 55: Management of Companies and Enterprises 56: Administrative and Support and Waste Management and Remediation Services
Education & Health Services	61: Education Services 62: Health Care and Social Assistance
Leisure & Hospitality	71: Arts, Entertainment, and Recreation 72: Accommodation and Food Services
Other Services	81: Other Services
Public Administration	92: Public Administration

Table B.2 shows the number of company records in the D&B file by major industry sector and company employee size classes. Single location companies and headquarters of companies with multiple branches were used in the tabulation. That is, a company with a headquarters and multiple branches in different locations was included as a single unit in the tabulations. The number of employees for the headquarters refers to the total number of employees in the company, including the employees in the branches. The number of employees includes full-time and part-time employees as well as the owners/proprietors. The D&B data were available by 4-digit SIC code. We converted the data to NAICS code using a conversion Table available from Census Bureau.

Table B.2. Number of Companies by Major Industry Sector and Company Employee Size Classes

Industry Sector	Number of Employees			Total
	5-14	15-249	250 or more	
Construction	205,164	92,595	1,517	299,276
Manufacturing	147,277	109,136	6,041	262,454
Wholesale Trade	101,424	46,145	759	148,328
Retail Trade	273,233	82,451	1,133	356,817
Transportation & Warehousing	39,882	28,225	797	68,904
Information	44,327	24,057	1,115	69,499
Financial Activities	146,690	56,414	2,145	205,249
Professional & Business Services	277,813	113,488	3,138	394,439
Education & Health Services	259,635	128,361	6,869	394,865
Leisure & Hospitality	169,619	127,364	1,476	298,459
Other Services	210,454	50,677	435	261,566
Public Administration	26,446	32,138	1,857	60,441
Total	1,901,964	891,051	27,282	2,820,297

Note: The companies with a missing employee count were distributed proportionately across the size classes of less than 250 employees. About 1.6 percent of the total number of companies had a missing employee count.

The sample size in each size class within the major industry sector should be large enough to provide sufficient number of completed interviews to obtain estimates with a reasonable precision. We will select a sample to yield 100 completed interviews in each of the 36 size class by industry sector strata. Therefore, in total, we target to obtain 3,600 completed interviews. The maximum percent error for estimates of percentages obtained from a simple random sample yielding 100 completed interviews will not exceed 10 percent, 95 percent of the time. The percent error is the largest for a 50 percent proportion and decreases as proportion moves further away from the 50 percent / 50 percent split. For example, for an 80 percent / 20 percent split, the error is 8 percent. Thus, 100 completed interviews in each of the size by industry strata should provide an adequate precision level for estimates of percentages. In some larger size strata where the company population is small, precision can be higher due to the effect of finite population correction.

The overall target response rate for the survey is 40 percent. Therefore, to obtain 3,600 completed interviews, we need to contact 9,000 eligible companies. We expect to find about 15 percent of the companies selected from the DMI frame as ineligible. That is, we expect to find about 8 percent of sampled DMI records as no longer active and additional 7 percent to report less than 5 employees in the interview. We expect the sample loss due to the latter reason, to occur mostly in the smallest employee size class. Thus, we will select a higher number of records from the smallest size class compared to the larger size classes. Since we will be able to sample the headquarters records representing the entire company as a single unit, we expect that the sample size loss due to ineligible duplicates in the sample representing different locations of the same company, to be very small. Overall, we plan to select 10,600 companies from the sampling frame in order to achieve 3,600 completed interviews.

B.2.3.4 Stratification

The sampling strata will be formed by three (small, medium, and large) size classes within each major industry sector. A uniform set of size class boundaries can be used across all the industry sectors. However, if employee size distribution varies largely across the sectors, optimal boundaries will also differ. A good approach is to form size classes so that the sum of the square root of the total number of employees is approximately equal across the size strata within each sector. Under this approach, large companies will have a higher chance of selection but not as much as if the strata have been formed by equalizing the employee totals across the strata. Consequently, there will be less variation in sampling rates across the size classes.

The company records can be stratified further in sample selection by an implicit stratification. This can be achieved through sorting the records by Census region, industry subsector (two and three-digit NAICS codes listed within the major industry sectors in Table 1) and the number of employees in the company within each explicit size by industry stratum and then drawing the sample systematically.

References:

Marker, David A. and Sherm Edwards (1997). "Quality of the DMI File as a Business Sample Frame." Proceedings of the Section on Survey Research Methods, American Statistical Association, 1997, pp. 21-30.

B.2.3.5 Sample Selection Method

The sample will be obtained by drawing an equal probability systematic sample of companies within each of the 36 size by industry sector strata. The sample selection will be independent across the strata. Within each stratum, the frame units will preferably be placed in a sort order by Census region and within region by industry subsector and within subsector by the number of employees in the company. This implicit stratification ensures the geographical dispersion among the sample companies and increases the probability that a range of company sizes within a stratum, are selected.

B.2.3.6 Sample Survey Operations

Westat will contact the selected companies to conduct a fifteen minute telephone interview with the senior executive who is most knowledgeable about company policies and practices on recruiting, hiring, retaining and advancing employees with disabilities. This activity will begin after OMB clearance, and once the pilot study is completed. Westat will employ appropriate telephone interviewing methods to insure cooperation of senior executives for this short survey. To obtain 3,600 completed interviews should take approximately six months from OMB clearance, including the pilot study, instrument revision and programming into CATI, and screening, recruiting and interviewing 3,600 senior executives.

B.2.4 Survey Instruments

The study consists of telephone interviews with senior executives. The interview is structured and contains specific questions that:

- Verify company demographics (industry type, size, location) obtained from Dun and Bradstreet (see Section B.2.3);
- Assess respondent demographics (title, number of years with company, number of years in position, number of employees supervised);
- Assess company practices in recruiting persons with disabilities (number of employees with a disability, recruiting practices, information that would enable recruiting of persons with disabilities);
- Address issues related to hiring and retaining employees with disabilities (perceived challenges and concerns in hiring, advancing and retaining employees with disabilities, as well as strategies to overcome these challenges);
- Assess recordkeeping on accommodations companies implement for employees with disabilities; and
- Determine familiarity with disability employment resources, such as the Job Accommodation network (JAN), the Employer Recruiting and Assistance Network (EARN), and Disability Program Navigators within the One Stop Career Center system.

B.3 Eliciting Cooperation/Maximizing Response Rates

The research team's extensive experience with business surveys has shown that response rates are maximized when procedures for achieving them are designed into and executed at every stage of a study's implementation. These procedures begin with the plan for development of the sample frame and continue through the development of the questionnaire and data collection. Factors that specifically influence reluctant individuals to participate include the following:

Advance Letter—The research team will develop an introductory letter to send to sampled businesses. The final version of the letter will be on ODEP letterhead and signed by an official at ODEP. The goal of this letter is to introduce the study, emphasize confidentiality, explain respondent's rights, and alert the respondents that an interviewer will be calling. A toll-free number will be included so that respondents could call to verify the legitimacy of the study, to ask questions or to set up an appointment for an interview.

Contacting the most appropriate respondent—We will send all small and medium-sized businesses the advance letter prior to the interviewer's call. Large businesses would be called to obtain the name of the most senior knowledgeable respondent. That respondent would then be sent the advance letter. Once the letter has been sent, an interviewer will call to complete the interview. If we cannot speak with that respondent after four attempts, we will then determine the name of a less senior, but equally knowledgeable respondent. We will ask for respondents by title, using the titles currently cited in the questionnaire, and others that may be discovered during the pretest. In a large company, many of the questions on the survey would probably be referred to Human Resources for responses (e.g. how does the company recruit employees with disabilities; are accommodations tracked, etc). Large companies often have human resources employees who are responsible for recruiting employees with disabilities and tracking accommodations made for employees. Information about respondents who are likely to respond or should respond will be collected during the pretest.

Contacting the corporate headquarters—We will contact the business' corporate headquarters, if applicable, and interview a respondent at the corporate office. If this is not possible, we will then conduct the interview with a senior knowledgeable respondent at one of the company's locations.

Experienced Executive Interviewers—Westat has a dedicated staff of experienced, executive interviewers whose job it is to conduct interviews with senior level business executives.

Interviewers' ability to obtain cooperation—Westat uses all experienced interviewers whenever possible. If needed, new interviewers will be hired and trained on telephone interviewing techniques, prior to the project-specific training. In any event, all interviewers are monitored, evaluated, and provided with instant feedback on their performance to eliminate interaction patterns or telephone demeanor that might be detrimental to achieving cooperation. (Newer interviewers are monitored at a higher rate than experienced interviewers.)

Flexibility in scheduling interviews—Being available to speak with people when it is most convenient for them is sometimes overlooked as a factor that can tip the balance in favor of cooperation for an individual who has doubts about participating. Interviewing activities for the survey will be scheduled to coincide with the hours people are most likely to be at work. In the event the respondents need to schedule interviews for a particular time, the CATI system can accommodate their needs.

Well-worded introductory statement--Our telephone interviewing experience has shown that one of the main reasons for nonresponse is that respondents hang up before the interviewer has a chance to explain the study. Immediately reassuring the person answering the telephone that the interviewer is not a salesperson and that the study is sponsored by ODEP will be crucial to the respondent's decision to listen to the rest of the introduction.

Refusal avoidance and refusal conversion—Perhaps the most significant technique for persuading reluctant individuals to participate is the interviewer training segment that encourages customer participation. Nearly as important is a well-planned and concerted effort to convert each refusal to final cooperation. For each case in which the respondent refuses to participate, the interviewer will complete a Non-Interview Response Form (NIRF). The form captures information about key characteristics of the refusing respondent and the stated reason(s) for refusing to participate. Special interviewer training sessions will be led by highly experienced supervisors for a select group of interviewers. The sessions include participating in the analysis of survey-specific and generic reasons for refusal, preparing answers and statements that are responsive to the objections; effective use of voice and manner on the telephone, and role-playing of different situations. This team of customer cooperation interviewers re-contacts the reluctant respondents. Westat's conversion program has consistently yielded conversion rates of 25 to 30 percent for individual interviews.

Informed Consent--When the respondent is called to be interviewed, the introductory statement the interviewer reads to the respondent will state the voluntary nature of the interview and assure the respondent that all of their responses will be kept confidential.

Quality Control--This survey will be conducted using Computer Assisted Telephone Interviewing (CATI) software. CATI is programmed to follow skip patterns. Interviewers are trained to probe to get complete answers to all survey questions. If a respondent does not know how to answer a question, or refuses to answer a particular question, those options are allowed on the questionnaire as well. However, no question can be skipped.

For the survey, Westat will implement procedures to review and edit questionnaire responses. Westat maintains a large in-house data preparation staff experienced in performing tasks for all study types conducted at Westat. During a CATI study, data preparation staff checks the CATI responses for consistency and continuously monitor the data. Interviewer comments and problem sheets are reviewed daily and updates are made as necessary. Frequencies of responses to all data items are reviewed to ensure that appropriate skip patterns are followed by the CATI system. Each item is checked to make sure that the correct number of responses is represented. When a discrepancy is discovered, the problem cases are identified and reviewed.

Frequencies of responses to open-ended and other/specify responses are also run. These responses are reviewed and are either upcoded into existing response categories (for other/specify responses) or categories are developed (for both open-ended and other/specify responses) for analysis.

B.4 Tests of Data Collection Instruments and Procedures

The research team will conduct a pretest of the contact procedures and the questionnaire, by calling 9 or fewer businesses. The contact procedures will be pre-tested to insure that they allow us to reach the correct respondent quickly. During the administration of the questionnaire, if the respondent hesitates when responding, we will ask the respondent to explain the difficulty he or she is having answering the

question. We will time the length of administration of the questionnaire and advise OMB if the time varies significantly from the estimated administration time of 20 minutes. We will also ask respondents follow-up questions, such as if they had difficulty understanding certain terms, if any of the questions did not apply to them and why; if there was something we did not ask but should have in order to better understand the employer perspective. Once the pilot interviews are completed, we will revise the questionnaire to reflect: (1) recommended changes to contact procedures to quickly contact the appropriate respondent and (2) recommended changes to the wording on the questionnaire. Changes to the contact procedures and questionnaire should be minor. The contact procedures have been successfully implemented on previous surveys of business executives, and the questionnaire was developed based on input from focus group participants.

B.5 Use of Statistical Survey Methodology

The use of statistical sampling methods is critical to this study. Westat has developed the sampling plan for this survey as described in Section B.2.3, using standard statistical methods. Westat is responsible for selecting the sample, and carrying out the analyses. Westat has consulted with Huseyin Goksel, a Westat statistician, on developing the sampling plan for the selection of the companies, as well as the survey methodology for the survey.