

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

Veterans' Employment Outcomes Study

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.

Congress passed the Jobs for Veterans Act (JVA) in 2002 to improve employment and training services for veterans and to encourage employers to hire them. JVA amended Title 38 of the U.S. Code, the legislation that governs the Disabled Veterans' Outreach Program (DVOP) and Local Veterans' Employment Representative (LVER) Program, and as a result, introduced reforms to the way employment, training, and placement services are provided to veterans. Among these changes, JVA called for establishing "a comprehensive performance accountability system to measure the performance of employment service delivery systems," including outcome measures consistent with the Workforce Investment Act (WIA). States established specific entered employment rate (EER) goals for DVOP specialists, LVER staff, and for the workforce system as a whole. However, the outcome measurement system has a number of "measurement gaps" that prevent states from reporting their true EERs. As a result, states do not fully reflect how successful veterans have been in finding employment.

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.

This survey, a new collection, is part of a two-pronged effort to learn more about veteran users of One-Stop Career Centers who received a staff assisted service from a DVOP specialist or LVER staff and do not appear to have had successful employment outcomes. The survey, which will be administered only to those veterans who have not been identified as finding employment, is an exploration of their characteristics, the job search problems they encountered, the services they received, and services they would have found helpful.

DOL VETS plans to purposively select states and then draw a random sample of veterans from within those states. States selected for the study must participate in both the Wage Record Interchange System (WRIS) and the Federal Employment Data Exchange System (FEDES). Five states -- South Dakota, Washington, Ohio, New Jersey and South Carolina -- meet the requirements and have agreed to participate. The results of this study will be used to inform policymakers on broad issues regarding the employment outcomes of veterans, not to provide statistical estimates that can be generalized beyond the selected state programs.

The other prong of the study is working with the participating states to understand gaps in the EER measurement process.

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.

This collection proposes to gather information directly through computer-assisted telephone interviews (CATI). Conducting a CATI survey provides for personal interaction reducing the possibility of a low response rate from a mailed survey and providing opportunity for immediate clarification of questions, if needed.

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 2 above.

No previous information collection reviewed by the project team gathered information that would identify key characteristics and reasons why some veterans have difficulty or fail to find jobs, identify what services were received and what veterans thought of them, and identify what services were not received and whether they were needed.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This collection does not impact small businesses or other 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.

If this collection is not conducted, DOL will not be able to fully assess how successful veterans are in finding jobs, characteristics and reasons why some veterans have difficulty or fail to find jobs, what services were received and what veterans thought of them, and what services were not received and whether they were needed.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- ! requiring respondents to report information to the agency more often than quarterly;**
- ! requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- ! requiring respondents to submit more than an original and two copies of any document;**
- ! requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- ! in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- ! requiring the use of 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.**

None of the items noted above apply to this information collection.

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.

The notice was on pages 11956 to 11957 of Federal Register Vol. 73, No. 44 on March 5, 2008. It is provided as a separate .pdf file.

- One commenter expressed concern that homeless veterans would be more difficult to locate than other veterans and may only have cellular phones that would make them less likely to participate in the survey due to the cost of using cellular phone minutes.

The contractor administering the survey will make every effort to follow up on initial unsuccessful attempts to contact the veteran. The survey contractor will also attempt to determine reasons for non-responses, which will be analyzed along with the survey results.

- Two comments expressed concern that respondents would have difficulty recognizing whether they were served by a veterans' representative at the Career Centers.

The sequencing and wording of the questions in the related section have been revised to reflect this concern, and the one question that specifically asks about visits with the veterans' representative has been removed. A question asking whether the veteran knows if they were served by a veterans' representative was added.

- One comment expressed concern that respondents would have difficulty recognizing the term Career Center and its brief description given at the beginning of the survey.

The Career Center description has been modified to address this suggestion. Also, as noted in the survey, the specific name of the Career Centers in each state will be researched and included in the survey description.

- One comment suggested adding a question related to receiving military retirement pay or veterans' disability payments.

A question about receiving veterans' disability payments has been added to the survey. The survey already has a question that provides information about military retirement pay.

- One comment suggested a revised way to refer to time periods in the answers to make the options clearer to the respondent.

As noted on the survey, the answer options for these questions will not be read to the participant, and the survey administrators will be trained on how to properly record answers. As a result, the study team did not act on this comment.

- One commenter questioned why several questions in the survey asked about specific industries or occupations and suggested the survey use Standard Occupational Classification (SOC) terminology.

SOC terminology has been incorporated into the survey for relevant questions. However, the industries and occupations asked about in the survey address specific study requirements. Some of the industries asked about were observed to hire veterans more frequently or are not covered in UI wage records.

- A few comments provided suggestions for rewording questions about services received at the Career Center.

Questions about Career Center services received including assessments, training, and supportive services have been reworded to address these comments.

- A few comments suggested questions should either be revised or deleted for reasons such as redundancy, inconsistency with definitions of program exit and unemployment, and unneeded requests for demographic information.

These suggestions were carefully reviewed and researched, but no changes to the survey were made. Existing question skip patterns mean there is no redundancy. Each question obtains information needed to learn about veterans who have had unsuccessful outcomes or to reveal EER measurement gaps.

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.

This is a one-time information collection.

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

We will not offer an incentive to participate.

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

An assurance of anonymity is made in the introduction just after the respondent confirms (Q1) that she or he meets the study's requirements to be a veteran who recalls using a One-Stop Career Center. SRA International, Inc. and Chamberlain Research Consultants, Inc. will supervise data management throughout the survey and analysis process and assure respondent anonymity. Only summary data will be reported.

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.

One section of the survey asks respondents to identify factors they felt made their job search more difficult. A number of complicating factors are listed, including:

- Post traumatic stress disorder
- Personal issues such as depression, other mental health problems, drugs or alcohol
- A criminal record.

VETS considers these questions necessary because veterans who experience these problems can be referred to services to help overcome them and achieve stable employment. This survey will identify the extent to which such problems occur among veterans who have difficulty finding employment. However, the survey responses are anonymous. There will be no follow-up that is specific to a respondent.

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

- !** Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- !** If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- !** Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be

included in Item 14.

The number of respondents for this one time information collection is 1,068 and an estimate of the hour burden is 267 hours based on an average completion time of 15 minutes per survey. The total annual cost to respondents is estimated to be approximately \$4,000 based on a wage of \$15/hour.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- !** The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- !** If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- !** Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The survey is a one-time data collection with costs as reported in Question 12.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

This data collection involves a one-time contractor cost of \$299,955, plus the cost to participating states of providing data on veteran users of their One-Stop Career Centers who were not identified as having found employment. The cost to the 5 participating states of providing the required data is estimated to be

approximately \$60,000 for all of the states combined.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

There are no program changes or adjustments in Items 13 or 14 of the OMB Form 83-I.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

A draft and final report will present and analyze aggregated data from the information collection. No complex analytical techniques will be used. The project associated with the information collection began August 30, 2007, and will end March 31, 2009. Key project dates include:

- Survey data collection currently scheduled to occur December 2008-January 2009.
- Draft report currently scheduled February 28, 2009.
- Final report currently scheduled March 31, 2009.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The survey will be administered via computer-assisted telephone interview (CATI), so that there will be no display. If needed, the interviewer can identify the expiration date, but that will use both the interviewer and the respondent's time. A preferred approach is to provide the expiration date for OMB approval upon request from the respondent.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

All of the statements identified in Item 19 of the OMB 83-I apply to this information collection.