

**Supporting Statement for Request for OMB Approval
Quarterly Census of Employment and Wages Green Goods and Services Industry Pre-testing**

A. JUSTIFICATION

1. Necessity of Collection

As the chief source of government data on employment, the 2010 Congressional Appropriation tasks the Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages (QCEW) program with producing data on green goods and services business employment. This initiative will produce regular tabulations of aggregate employment and wages for businesses whose primary activities fall into green goods and services as defined by BLS. These series will be key to analyzing workforce trends in this area.

The QCEW program publishes a quarterly count of employment and wages reported by employers covering 98 percent of U.S. jobs, available at the county, Metropolitan Statistical Area (MSA), State, and national levels by industry. The QCEW program also maintains a business register database of all establishments in the U.S. subject to unemployment insurance taxes.

The purpose of this request for clearance is for the QCEW program to initiate a research project to understand the collection environment and learn what information establishments have available that would help BLS collect data on green goods and services industry employment. Respondents involved in this research project will be drawn from a sample frame that is the most current quarter of the QCEW business register. The research project plan which will be conducted by BLS and a contractor, includes:

- Feasibility and cognitive interviews – we plan to conduct feasibility interviews to better understand the collection environment. A small number of in-person cognitive interviews will also be done to test a respondent’s understanding of potential survey form questions.
- Data collection forms design - we plan to test multiple variations on a form during this research project.
- Panel testing - we plan to test the form variations on panels of respondents. The panels will be mailed the forms and will be asked to return the forms by mail. Non-response prompting and edit reconciliation processes will also be tested and conducted on these panels.
- Follow-up interviews - we plan to contact establishments that responded and establishments that did not respond to the form during panel testing to ask about the form, difficulty in completion, respondents’ understanding of the questions to assess response error, and reasons for non-response. All interviews will be conducted by an experienced interviewer.

The primary purpose of this research is neither to finalize a definition of the green goods and services sector nor to determine what defines the green goods and services sector. Rather, the focus is on learning what collectable information firms have available about their products, services, and other items that might be used to collect data on this sector. The BLS definition of the green goods and services sector will be addressed in a separate notice.

The data collected during the design and testing phase are purely informational and educational and will be used for internal purposes only.

2. Description of the Information Collected

The data collected during this research will be used to understand the collection environment, ensure the questions result in valid data, and develop processes to minimize non-response and respondent burden. The information collected will be used for internal research purposes only.

3. Use of Technology to Reduce Burden

The research project will use available technology to reduce burden on the respondents during each phase of the research. In this initial testing Computer Assisted Telephone Interviews may be used in some cases and as BLS moves from testing to full-scale production (beyond the work covered in this package), the use of CATI or other technologies will be explored as ways to reduce respondent burden.

4. Identification of Duplication and Availability of Similar Information

Several individual States have conducted surveys on green employment in their State. However, these studies only covered the individual State and many were focused on occupational data collection. In addition to these State studies, there are several academic and research organizations that have published data using existing data sources on the green economy in the U.S. Outside of the U.S., Statistics Canada has conducted surveys on the Canadian environmental sector¹ and Eurostat has offered detailed guidance to its member countries on measuring the environmental sector². BLS has reviewed the existing research and studies conducted by the individual States, Statistics Canada, and Eurostat extensively and plans to use the findings to enhance its research. However, there is no existing research or data that duplicates the research BLS intends to conduct.

5. Small Businesses

Small firms will be included in the research project. The information requested is readily available in both small and large firms so the impact to small businesses will be similar to that of larger businesses. Special attention will be paid to selecting reference periods for data elements that are easily understandable and identifiable to all sized businesses.

6. Less Frequent Conduct of Study

This is a research project to identify and develop a data collection form that will be used to collect data on green goods and services sector employment in the United States. This research is expected to be conducted over a 6-month time span. Without the time allowed for the necessary research, BLS may not be able to meet its publication deadlines.

7. Special Circumstances

This research project will be conducted over 6 months in FY2010.

8. Consultation with Persons outside BLS

No comments were received as a result of the Federal Register Notice published in 75 FR 3926 on January 25, 2010.

¹ Statistics Canada. *Environment and Industry Sector: 2002 revised and 2004*.
<http://www.statcan.gc.ca/pub/16f0008x/16f0008x2007001-eng.pdf>

² Eurostat. (2009). *The Environmental Goods and Services Sector: A data collection handbook*.
http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-RA-09-012/EN/KS-RA-09-012-EN.PDF

BLS has met and/or spoken with numerous other Federal agencies, Statistics Canada, Eurostat, and industry groups to gather information about collection issues regarding environmental data and related products. This information will be used during this project.

9. Gifts or Payments to Respondents

There will be no gifts or payments to respondents.

10. Confidential Responses

The Confidential Information Protection and Statistical Efficiency Act of 2002 (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.

The Bureau of Labor Statistics Commissioner's Order 1-06 "Confidential Nature of BLS Statistical Data," explains the Bureau's policy on confidentiality:

In conformance with existing law and Departmental regulations, it is the policy of the BLS that:

Respondent identifiable information collected or maintained by, or under the auspices of, the BLS for exclusively statistical purposes and under pledge of confidentiality shall be treated in a manner that will ensure that the data will be used only for statistical purposes and will be accessible only to authorized persons.

This policy remains in effect.

11. Sensitive Questions

No sensitive questions will be asked.

12. Burden of Collection

Explanation of how the total burden hours were derived for fiscal year 2010 is illustrated below.

Fiscal Year 2010		
	Respondents	Avg. Response Time
Feasibility interviews	200	30 minutes
Cognitive interviews	20	60 minutes
Forms panel testing	1,400	30 minutes
Follow-up interviews	200	30 minutes
Total	1,820	55,200 minutes or 920 hours

There are a total of 1,620 respondents and 1,820 responses. The difference between the total number of respondents and the total number of responses reflects the fact that the respondents contacted for the follow-up interviews are a subset of the respondents contacted during the forms panel testing. About 200 of the respondents will be contacted twice, once during the panel testing and a second time for the follow-up interview.

Estimated total Burden Hours are 920.

The total estimated Burden Cost to the respondents is \$15,815.

Burden cost was calculated by obtaining the median hourly wage rate for Human Resource Assistants, except Payroll and Timekeeping, as determined by Occupational Employment Statistics (OES) National Occupational Employment and Wage Estimates. The wage rate for 2008, the most current year available, was \$17.19. The hourly rate was then multiplied by the number of hours required for responding (burden hours).

13. Capital/Start-up costs

There are no capital/start-up costs.

There are no costs for operation and maintenance or the purchase of services.

14. Cost to the Federal Government

The allocated budget for this data collection effort for FY2010 is 350,000 dollars.

15. Changes in Burden

This research project represents a new collection.

16. Publication Plans/Schedule

The information collected during this research project will not be released for publication. The information gathered will be used to develop a data collection form that will be put forth for clearance in a separate package.

17. OMB Approval Expiration Date

Permission for suppressing the expiration date is not being requested.

18. Exception to Certification Statement

There are no exceptions to the certification.