Supporting Statement for Request for OMB Approval Occupational Employment Statistics Green Technologies and Practices Data Collection Clearance

A. JUSTIFICATION

1. Necessity of Collection

The Bureau of Labor Statistics (BLS) is seeking clearance for the collection of data on occupational employment and wages related to green technologies and practices used by U.S. businesses. The new Green Technologies and Practices (GTP) survey will collect data on the use of green technologies and practices at establishments, and occupational employment and wages for employees who spend more than 50 percent of their time engaged in green practices.

As the chief source of government data on employment, BLS will produce data on employment related to green technologies and practices at establishments as tasked by the 2010 Congressional Appropriation. This new survey will be conducted as a special topic survey to assess the practicality and usability of this type of data collection.

From the GTP survey, BLS intends to publish occupational employment and wages associated with the use of green technologies and practices at U.S. business establishments to meet the requirement outlined in the 2010 Congressional Appropriation. BLS plans to publish occupational data by industry sector for the U.S. and geographic data at the Census region level.

This survey will use the business register, Quarterly Census of Employment and Wages (QCEW), maintained by BLS as its sampling frame. The register contains employment information on establishments in the U.S. subject to unemployment insurance taxes. This register covers 98 percent of U.S. jobs, available at the county, Metropolitan Statistical Area (MSA), State, and national levels by industry.

BLS currently is undertaking extensive research to develop data collection forms and methodology, and to understand the collection environment related to green technologies and practices. This research was outlined in a prior Federal Register Notice published on June 30, 2010 (75 FR 37839). The forms design research has been completed and the forms put forth for clearance in this package were field-tested and incorporate the research and lessons learned from the field testing.

In a separate Federal Register Notice published on September 21, 2010 (75 FR 57506), BLS outlined its final definition of green jobs. This definition is available at www.bls.gov/green.

2. Description of the Information Collected

The GTP survey will collect information on an establishment's reference month employment, use of green technologies and practices, and occupation and wage information for employees who spend more than 50 percent of their time in activities related to green technologies and practices. The reference month employment figure will be compared to employment data BLS has on file as part of the QCEW in order to verify data are being collected for the correct establishment.

BLS will conduct a Response Analysis Survey (RAS) on up to 1,000 GTP respondents and non-respondents to ensure accurate data collection and to assess non-response bias. The RAS will begin immediately following the general data collection for the GTP survey. BLS will examine general data quality issues in the RAS.

3. Use of Technology to Reduce Burden

The data collection will use available technology to reduce burden on the respondents. GTP will be a mixed-mode survey. Methods of data collection include a web-based collection instrument, mailed survey forms, fax, email, and telephone and mail follow-up. This special survey will be conducted in 2011, and completed in early 2012.

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 collection¹. 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.² Outside of the U.S., Statistics Canada has conducted surveys on the Canadian environmental sector³ and Eurostat has offered detailed guidance to its member countries on measuring the environmental sector⁴. BLS has reviewed the existing research and studies conducted by the individual States, Statistics Canada, and Eurostat extensively and used the findings to enhance its collection. However, there is no existing research or data that duplicate the data BLS intends to collect and publish.

5. Small Businesses

Small firms will be included in the data collection. 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 businesses.

6. Less Frequent Conduct of Study

This special survey will be conducted in 2011 and 2012. BLS intends to assess the practicality and usability of collecting occupational employment and wages related to green technologies and practices. The employment related to green practices in U.S. businesses is unknown at this time.

7. Special Circumstances

There are no special circumstances.

¹ Hardcastle, A. (2009). 2008 Green Economy Jobs in Washington State. WA.

 $[\]underline{http://www.workforceexplorer.com/admin/uploadedPublications/9463_Green_Jobs_Report_2008_WEXVersion.pdf}$

² The PEW Charitable Trusts. (2009). *The Clean Energy Economy: Repowering Jobs, Businesses and Investments Across America*. http://www.pewcenteronthestates.org/uploadedFiles/Clean Economy Report Web.pdf

³ Statistics Canada. Environment and Industry Sector: 2002 revised and 2004.

http://www.statcan.gc.ca/pub/16f0008x/16f0008x2007001-eng.pdf

⁴ 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

8. Consultation with Persons outside BLS

In response to the Federal Register Notice published on March 16, 2010 (75 FR 12571), BLS received 16 comments concerning the collection of data on employment related to green processes. Responses to these comments were included in the Federal Register Notice published on September 21, 2010 (75 FR 57506) which also included the final definition of green jobs.

In response to the Federal Register Notice published on February 3, 2011 (76 FR 6161), BLS received two comments concerning the collection of data on employment related to green technologies and practices. One comment suggested that more than one respondent may be necessary at an establishment to complete the full survey and that BLS may have underestimated the amount of time necessary to complete the entire survey for both businesses and data collectors. This comment also included the difficulty BLS might face collecting revenue data by activity which is not part of this survey. BLS research, conducted under OMB Clearance number 1220-0182, indicates that 20 minutes on average is an accurate estimate for the amount of time required to compile and report the information requested on the GTP survey form. One comment concluded that it might be difficult to drive respondents to a web-based collection mechanism and that in a prior survey of green jobs "less than 10% of their survey responses were return by mail or entered on-line." BLS research conducted under OMB Clearance number 1220-0182, has yielded an adjusted usable response rate of about 50% collected by mail. Further GTP research conducted under OMB Clearance number 1220-0182, scheduled to conclude in July 2011, will test the viability of a web-based collection instrument. The GTP will be a mixedmode survey employing, mail, fax, e-mail, web, and telephone collection.

BLS has met and/or spoken with numerous other Federal agencies, Statistics Canada, Eurostat, State labor market information offices, and industry groups to gather information about collection issues regarding environmental data and related products. This information was used during the development and testing of the form.

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 for the GTP collection were derived for fiscal years 2011 and 2012.

	GTP: FY2011 – FY2012			
			Avg.	
	Sample		Response	Total Response
	Units	Responses	Time	Time
Private sector establishments	29,470	22,103	20 minutes	7,368 hours
Local government establishments	3,650	2,738	20 minutes	913 hours
State government establishments	1,160	870	20 minutes	290 hours
Federal government establishments	720	540	20 minutes	180 hours
Response Analysis Survey	1,000	750	20 minutes	250 hours
Total	36,000	27,001		9,001 hours

Estimated total Burden Hours for FY2011 – FY2012 are 9,001.

The total estimated Burden Cost to the respondents for FY 2011 – FY2012 is \$400,965.

GTP burden cost was calculated by obtaining the median hourly wage rate for General and Operations Managers, as determined by Occupational Employment Statistics (OES) National Occupational Employment and Wage Estimates. The median hourly wage rate for 2009, the most current year available, was \$44.55. The hourly rate was then multiplied by the estimated number of responding units assuming a 75 percent response rate, and the number of hours required for responding (burden hours) for the FY 2011 – FY2012 calculation.

GTP research conducted under OMB clearance number 1220-0182, measured the average respondent burden associated with completing the GTP survey form at 17 minutes. Smaller firms (with 10 or fewer employees) reported needing less time to complete the survey, on average 10.6 minutes, while larger firms (with 100 or more employees) reported more needing an average of 21.8 minutes to complete the form.

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, beyond those described under A.14.

14. Cost to the Federal Government

The allocated budget for this data collection effort for FY2011 is \$2.4 million for the GTP survey. The budget for the GTP survey includes: web-based data collection development; computer systems development; survey form printing and mailing; processing and coding of collected information; non-response prompting; telephone data collection and edit reconciliation; data analysis; and publication of estimates.

15. Changes in Burden

This represents a new collection.

16. Publication Plans/Schedule

The estimates derived from the information collected will be released for publication in Summer 2012. The publication will provide an estimate of the number of establishments that use green technologies and practices and the occupational employment and wages of green jobs, as defined by BLS. These data will be made available to the public via the BLS public website.

Data collection for the GTP Survey is scheduled to begin in August 2011, and conclude in January 2012. Following the conclusion of data collection, a Response Analysis Survey (RAS) will be conducted in January and February 2012. BLS anticipates submitting the RAS questions as a non-substantive change to this clearance in November 2011.

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.

Attachments for Section A

- 1. Cover Letter version 1
- 2. Cover Letter version 2
- 3. GTP Survey form
- 4. GTP Web Reporting Instructions
- 5. GTP Adobe Fillable Form
- 6. GTP IDCF Screen Shots
- 7. GTP Non-response prompt postcard
- 8. GTP Fax form
- 9. Automated E-mail providing Adobe fillable form