

**Supporting Statement for Request for OMB Approval
For Occupational Employment Statistics Related to Green Practices Pre-testing**

A. JUSTIFICATION

1. Necessity of Collection

The 2010 Congressional Appropriation tasks the Bureau of Labor Statistics (BLS) with producing occupational employment and wage data on green jobs. This initiative will produce information on: (1) the number of and trend over time in green jobs, (2) the industrial, occupational, and geographic distribution of green jobs, and (3) the wages of the workers in these jobs.

BLS presented its approach to measuring green jobs and the proposed definition of green jobs in the March 16, 2010, Federal Register (75 FR 12571). The measurement approach includes two types of surveys: one on jobs related to producing green goods and services, and one on jobs related to using environmentally friendly production processes and practices. This request for OMB approval concerns research for the second type of survey, specifically jobs related to environmentally friendly production processes and practices.

This new research is separate and distinct from current research the BLS is conducting on the collection of share of revenue for establishments that produce green goods and services (OMB Control Number 1220-0181). The Green Goods and Services research is being conducted, in part, to determine if firms in green industries can report the share of revenue received from the sale of green goods and services, and whether the revenue share can then be used to adequately apportion the total employment of the establishment related to the production of green goods and services. The research described here in this information collection request focuses on defining environmentally friendly production technologies and practices and the ability of firms to provide occupation and wage information on jobs associated with those defined technologies and practices.

BLS requests clearance to initiate a research project to understand the collection environment, learn what information establishments have available that would help us collect data on occupational employment and wages in jobs associated with environmentally friendly production processes and practices, and design instruments to collect that information. Respondents involved in this research project will be drawn from one or more sample frames as described in Part B below. The research project includes:

- Data collection forms design - we plan to test multiple variations of a form during this research project.
- Panel testing - we plan to test the form variations on panels of respondents. The establishments in all panels will be mailed the forms and will be asked to return the forms by mail. Non-response prompting via postcard or telephone and edit reconciliation processes will also be tested and conducted on these panels.
- Response analysis interviews - we plan to contact establishments that responded and establishments that did not respond 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.
- Web collection testing – we plan to develop and test a web collection instrument during this research project to assess the impact of different collection modes on data quality and response rates.

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The primary focus of this research is to learn what collectable information establishments have available about their internal environmentally friendly production processes and the employees involved in these processes and to develop collection instruments that will lead to both high data quality and high response rates.

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

BLS will use the data collected during this research 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 to guide in the development of the final form for collection of production data.

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 (CATI) may be used in some cases, and as BLS moves from testing mail forms to testing a web collection instrument, the use of CATI for non-response follow-up, and web collection will be measured for 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. 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. including a study by U.S. Department of Commerce¹. Outside of the U.S., Statistics Canada has conducted surveys on the Canadian environmental sector² and Eurostat has offered detailed guidance to its member countries on measuring the environmental sector³. BLS has reviewed the existing research and studies conducted by individual States, the U.S. Department of Commerce, 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

¹ U.S. Department of Commerce. *Measuring The Green Economy*, April 2010.

<http://www.esa.doc.gov/GreenEconomyReport/GreenReport.pdf>

² Statistics Canada. *Environment and Industry Sector: 2002 revised and 2004*.

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

³ 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

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This is an original research project to define environmentally friendly production processes and practices and test the ability of firms to provide occupation and wage information on jobs associated with those defined processes and practices. This research will be conducted over an 8-month time period. Without the time allowed for the necessary research, BLS may not be able to meet its publication deadlines.

7. Special Circumstances

This ground breaking research project will be conducted over 8 months in FY2011. The research includes mailing surveys and conducting a response analysis survey for respondents and non-respondents all within a 6-week timeframe for each panel. To meet the schedule we have for this research we are requesting that the respondent return the completed for within 15 days. The schedule for conducting non-response prompting and the RAS interviews is very tight. While 30 days is reasonable for a production survey with a longer collection cycle, for this research we are requesting a 15 day turnaround.

8. Consultation with Persons outside BLS

In response to the June 30, 2010, Federal Register Notice (75 FR 37839), BLS received comments from seven entities: four State workforce agencies; one business or industry association; one academic or research association; and one State economic development agency. BLS reviewed and considered all comments and made changes in the Forms Design and Pilot Testing for the BLS Green Practices and Processes research proposal as described below. In the June 30, 2010, Federal Register Notice, BLS requested comments and recommendations from the public on the proposed new collection of information on green processes and practices. BLS was especially interested in comments on:

1. Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility.
2. The accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used.
3. The quality, utility, and clarity of the information to be collected.
4. Minimizing the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses.

The following summary addresses the comments received on each of these questions, followed by other comments related to production survey sampling, data collection protocols, and the BLS Green Jobs Initiative in general.

Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility. Universally, all seven parties commented that the new information collection is appropriate for the proper performance of the agency and believe that the information has immediate and practical utility.

The accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used.

Four comments addressed this topic. One comment indicated that the potential for multiple respondents at an establishment could increase the respondent burden, and one comment indicated that the size of an establishment could increase the burden time for completing the survey. One comment agreed with the BLS estimate of 20 minutes, and one comment endorsed BLS' method for evaluating respondent burden. BLS responds with the collection of burden information from respondents in the response analysis survey (RAS). This information will allow BLS to more accurately estimate the burden associated with collecting this information.

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The quality, utility, and clarity of the information to be collected.

Fifteen comments addressed this topic. Comments universally agreed on the utility of the information collection request. Several comments addressed potential improvements in the examples and wording of the questions and the location of input boxes on the survey form. BLS notes that several of these suggestions were consistent with the results of the BLS cognitive testing. The research initiative will assist BLS in developing a well-designed form and will include research on the specific suggestions listed below.

One comment suggested using the term “green” and not using the term “environmentally friendly,” and one comment suggested that BLS not use the term “green-collar.” BLS notes that the cognitive research on terminology has been inconclusive. BLS responds by including terminology in the proposed research study to better understand the general public’s definition of these terms and their meaning.

Three comments suggested specific form design changes. BLS responds by noting that the research project is intended to yield a well-designed and thoroughly tested form that uses state of the art design concepts. BLS has considered the suggested form changes.

Two comments suggested alternative wording and additional illustrative examples of environmentally friendly categories of activities specifically in the areas of pollution reduction, abatement and remediation, and material remanufacturing and reuse. BLS responds by noting that the project includes research in terminology as well as forms design. BLS has considered the suggested terminology.

Two comments addressed the difficulty respondents have differentiating between green products and green processes. BLS notes that cognitive research also found that green product producers had a difficult time separating the products they produce from the processes they use to produce them. BLS will continue to research the list of environmentally friendly processes included in the survey as well as the instructions provided for reporting a specific green process and the employees associated with that process to decrease ambiguity and increase quality.

One comment suggested that BLS collect job duties for occupations reported. BLS has responded by adding a request for a brief description of job duties to the survey form for each occupation reported by respondents.

One comment suggested that BLS ask about new activities or practices an establishment may have recently instituted as green processes are considered fairly new and innovative, and to ask how many fulltime equivalent (FTE) employees are associated with those activities. BLS responds that some changes to the RAS scripts are expected and that the RAS will include asking about activities that may have been omitted from the form and employment in those activities. However, BLS also notes that FTE is not the employment measure to use as part-time employees are included in the OES measure of employment and the green practices and processes survey will be consistent with the OES. Related to this specific topic, one comment suggested BLS add specific instructions to the form for reporting part-time employees at their hourly wage rate. BLS has responded by adding additional instructions for reporting the wages of part time employees.

One comment suggested that BLS needs to be clearer on whether the number of contract employees, or the number of contractors, is being requested. BLS responds that cognitive research also indicates that the instructions on the form need to be clear that what is being requested is a count of consultants and/or contract employees engaged in green activities at the establishment.

One comment questioned the fifty percent metric for including employment related to green practices, as some green practices are new and emerging and may not meet the measurement threshold. One comment

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suggested using the term “essential function” of a job to eliminate the reporting of all office staff simply because they recycle paper. BLS responds that the measurement threshold and the terminology will be included in the research.

One comment suggested respondents may have difficulty determining the exact months to be used as the “last twelve months” and suggested rewording to “the twelve months prior to receiving this questionnaire.” The comment also suggested including questions on the reported time frame in the RAS. BLS responds that questions concerning the time frame for reporting will be included in the RAS.

Minimizing the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses.

Five comments addressed this topic. Three comments suggested the BLS offer a web collection alternative. BLS responds that the research initiative includes developing a web collection instrument.

One comment suggested using existing OES wage data rather than collecting it as a part of this survey as the wage differential in an occupation is expected to be small. BLS responds that without collecting occupation and wage data for these green jobs BLS does not know if any wage differential exists between green and non-green in the same occupation.

One comment suggested providing the O*Net list of green occupations to the respondent to reduce burden. BLS responds that it is possible that the O*NET list of green occupations could be enhanced by the occupational data collected for the green processes and practices survey and it would be useful to determine the extent that these two data sets can complement one another.

Other comments received concerning sample design, overlap with other surveys, combining both approaches into a single survey, and recommendations for improving response rates.

One comment suggested notifying employers in advance that they have been selected to participate in the survey. BLS responds that data collection procedures will be consistent with survey best practices including prenotification of participation, an explanation of sample selection, and coordinated collection with other BLS surveys.

One comment did not support the revenue approach to collecting employment related to green products and services published in a prior federal register notice. BLS responds that this comment is not within the scope of this Federal Register notice, but is addressed in the BLS response to the March 16, 2010, notice concerning the BLS green jobs definition and measurement plans.

Three comments concerned the sample design for the full-scale process survey. One comment suggested BLS exclude private households from the sample; BLS responds that private households are excluded from the survey. One comment questioned specifically how the full-scale survey’s sample will be stratified. BLS responds that the full-scale survey’s sample design has not been finalized. The final sample design will meet or exceed established BLS quality standards. Also, BLS is currently researching the feasibility of using a dual frame for sampling. One comment questioned the adequacy of the projected 35,000 unit sample size for the full-scale survey, and BLS responds that while the sample size has not yet been finalized, it is driven at least in part by budgetary constraints.

One comment suggested combining the green goods and services survey with the green practices and processes survey. BLS responds that the separate data collection initiatives are being conducted based on their feasibility as well as their utility.

One comment addressed concerns related to sample overlap between the green goods and services survey and the green practices and processes survey. BLS agrees this overlap is of interest; the data BLS will collect will provide an indication, but not a direct measure, of the overlap.

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One comment suggested that BLS be able to distinguish between whether an establishment is producing green good or services or using green practices. BLS responds that the two proposed collection initiatives, employment related to the production of green goods and services, and employment related to green practices and processes will make that distinction.

One comment suggested BLS work with industry associations to improve response rates and survey coverage for specific sectors. BLS responds that collaborative efforts with green associations have been fruitful to date that these efforts have lead to sample design modifications and research on a dual-frame sample design. BLS agrees that industry association cooperation will be useful in improving response rates.

BLS also published a Federal Register Notice in 75 FR 12571 on March 16, 2010 seeking input on the definitions to be used in measuring green jobs and associated wages via the process approach. In response to that notice, BLS received over 150 comments; however only 16 comments were specific to the process survey approach. Those comments have been reviewed and are being used to further refine the process survey. BLS response to the comments received and the final BLS green jobs definition will be published in a forthcoming Federal Register Notice.

BLS has met and/or spoken with numerous other State and Federal agencies including Department of Commerce, 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 current 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."

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 2011 is illustrated below.

	Fiscal Year 2011			
	Total	Expected	Respondents/	Avg. Response Time

	Sample	Response Rate	Responses	
Forms panel testing	2,429	70%	1,700	20 minutes
Web panel testing	714	70%	500	20 minutes
Follow-up interviews	250	//////////	250	30 minutes
Total	3,393	//////////	2,200/2,450	51,500 minutes or 858 hours

There are a total of 2,200 respondents and 2,450 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 250 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 858.

The total estimated Burden Cost to the respondents is \$38,224.

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 wage rate for 2009, the most current year available, was \$44.55. 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 or costs for operation and maintenance or the purchase of services.

14. Cost to the Federal Government

The allocated budget for this data collection effort is \$203,000.

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.