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PART A: SUPPORTING STATEMENT FOR PAPERWORK ACT SUBMISSION

The U.S. Department of Labor (DOL) contracted with Mathematica Policy Research to conduct an evaluation of the impact of a subsidy for health benefits under the Consolidated Omnibus Budget Reconciliation Act (COBRA) that was provided by the American Recovery and Reinvestment Act (ARRA) of 2009. The subsidy was available to workers who experienced involuntary termination of a job from September 2008 to May 2010, were eligible for COBRA at the time of job loss, and were not eligible for certain other health insurance options. The overall aim of the Mathematica evaluation is to determine whether and how people who had employer-sponsored health insurance maintained health care coverage after employment termination and whether the COBRA subsidy provided by ARRA led to increased health care coverage. DOL is requesting Office of Management and Budget (OMB) clearance for approval to conduct a one-time survey of randomly selected unemployment insurance (UI) recipients (COBRA Subsidy Study Survey) as part of this evaluation.

1. Circumstances Necessitating the Data Collection

COBRA offers workers and their dependents with employer-sponsored health benefits from firms with 20 or more employees the opportunity to extend their coverage for limited periods of time if they lose their benefits due to such circumstances as voluntary or involuntary job loss, reduction in the hours worked, death, divorce, and other life events. COBRA continuation coverage laws are administered by several agencies, including DOL, Health and Human Services, and the Treasury Department. DOL's interpretive and regulatory responsibility is limited to the disclosure and notification requirements of COBRA. DOL is involved in the enforcement of COBRA but does not collect program data regarding its utilization or the characteristics of those enrolling in it, nor does any other government agency.

ARRA, as amended most recently by the Continuing Extension Act of 2010, provided for temporary premium reductions. Eligible individuals paid only 35 percent of their COBRA premiums, with the other 65 percent reimbursed to the coverage provider through a tax credit. To qualify, individuals must have experienced a particular COBRA qualifying event—involuntary termination of a covered employee's employment—and not otherwise have been eligible for group health insurance or Medicare. The involuntary termination must have occurred between September 1, 2008, and May 31, 2010. The premium reduction applied to periods of health coverage that began on or after February 17, 2009, and could be claimed for up to 15 months. In particular, eligible individuals who lost a job from September 1, 2008, to February 17, 2009, could claim the subsidy for premium reductions only for periods of insurance that began on or after February 17, 2009.

Official statistics on the number of individuals that have participated in the subsidy program are not available. Because the Internal Revenue Service (IRS) processes payroll tax data for premium reduction withholdings, it can provide the number of policyholders that took the subsidy. However, data on the number of dependents enrolled, the share of the population that is eligible for and utilized the subsidy, the number of months enrollees received the subsidy, and the length of time they were enrolled in COBRA all remain lacking. The IRS data can be used to calculate the direct cost of the subsidy, but detailed data on individuals are required to study its impact, including who benefits from the subsidy and how people make insurance decisions after job loss. No data currently exist that can be used to study these individual characteristics.

To fulfill this data limitation, DOL is sponsoring a study focusing on whether people who lost their jobs maintained health care coverage and whether they used COBRA. The analysis will describe the factors associated with being eligible for the subsidy, providing insights into the types of people who had the potential to benefit from it. The study will document COBRA and other health insurance enrollment decisions among individuals experiencing job loss and how these decisions relate to characteristics of the individuals and their families. This will provide a picture of how people make these health care decisions and the impediments they might face in maintaining health care coverage for themselves and their dependents when employer-sponsored coverage is no longer available.

The study will also provide an estimate of the impact of the availability of the subsidy on COBRA enrollment, health, and employment outcomes. Measuring the impact of the subsidy and developing a better understanding of health insurance decisions after job loss will enable DOL to evaluate the efficacy of the subsidy and inform future policies aimed at increasing health insurance coverage.

The study requires collecting information on people who lost a job and were eligible for COBRA at the time, including both people who did and people who did not qualify for the subsidy. Key domains in which data will be collected include employment, health insurance coverage, health and health care utilization, financial well-being, and knowledge of and participation in COBRA.

This information will be collected in a one-time survey, the COBRA Subsidy Study Survey, administered to people who lost a job and were eligible for COBRA. As described in detail in the next section, the survey will focus on three groups of COBRA-eligible individuals, defined by subsidy-eligibility status. The study's sample frame, described in detail in section 1 of Part B, requires that people be screened to determine whether they were COBRA-eligible at the time of job loss and will therefore be included in the survey. It will take about 6 months to obtain the 5,800 completed surveys needed to address the study's research questions, with fielding initiated upon receipt of OMB approval.

2. How, by Whom, and for What Purpose the Information Is to Be Used

a. Overview of the Evaluation

DOL sponsored this study to learn about the effects of the ARRA subsidy on COBRA coverage and duration, and to paint a broad picture of potential COBRA recipients and their health coverage status. The study will answer several questions:

1. What is the impact of the subsidy on COBRA take-up and other outcomes such as health, duration of health insurance coverage, and unemployment duration?

The impact analysis is a key measure of the efficacy of the subsidy. This information could be used, for example, to calculate the number of people who enrolled in COBRA but would not have done so without the subsidy. Phrased somewhat differently, the impact analysis will be able to capture the incremental change in take-up rate in COBRA resulting from the offer of the subsidy. The analysis will estimate the direct effect of the subsidy's availability on COBRA enrollment, as well as its indirect effect on employment, health, and other outcomes that may be affected through enrollment in COBRA. The study will also examine how the impact varies by worker characteristics, such as income and health status.

2. What are the characteristics of COBRA-eligible and subsidy eligible individuals?

Documenting the number and characteristics of people eligible for COBRA and people eligible for the subsidy will provide evidence on which workers are most likely to benefit from each program. Since the subsidy can be claimed only by COBRA-eligible individuals, this analysis will provide a context for understanding the potential of the subsidy to reach particular groups.

3. What are the characteristics of COBRA enrollees who experienced job loss?

Comparing the characteristics of COBRA enrollees to those of eligible nonenrollees provides direct information about who benefits from COBRA. Describing enrollees and identifying predictors of enrollment will help provide a context for understanding individual and family health insurance decisions. Survey respondents' stated reasons for enrolling or not enrolling in COBRA and their choices of alternative health plans provide additional insight into the enrollment decision from the perspective of the worker.

b.   Data Needs

A unique set of data is needed to detect the impacts of the offer of the subsidy on COBRA coverage, and to describe the behaviors and decision making of COBRA-eligible individuals. Data are needed on (1) people's socioeconomic, demographic, and household characteristics; (2) people's knowledge and awareness of COBRA and the subsidy and how they obtained this information; (3) key outcomes that potentially could be affected by the subsidy, including COBRA take-up and enrollment duration, as well as other health and employment outcomes; and (4) predictors of these outcomes, including cost of enrolling in COBRA, ability to pay (e.g., income, debt), preferences (e.g., health at time of job loss, demographics), quality of the COBRA coverage (i.e., plan characteristics), availability of alternative coverage options, and environmental factors such as characteristics of the firm from which the worker separated and the local area in which the worker lives.

Because information on the groups of interest is not readily available in any existing survey or administrative data, the COBRA Subsidy Study Survey will be the primary source of data for the study. A random sample of UI recipients will serve as the basis for identifying, in the target population of workers, individuals who lost a job and became COBRA-eligible. The sample will be further divided into three groups targeted for data collection: (1) a *subsidy-eligible sample* comprising people who were eligible for the ARRA COBRA subsidy; (2) a *subsidy-comparison sample* consisting of people who would have been eligible for the subsidy except for the timing of the job loss; and (3) *a subsidy-ineligible sample* made up of job losers who were eligible for COBRA but did not meet the subsidy criteria for reasons other than timing of job loss. Data collection will focus on individuals who lost their job (1) during the period in which the subsidy was in place (February 17, 2009, to May 31, 2010), to collect information from the subsidy-eligible population; and (2) on the period after the subsidy ended (June 1, 2010, to March 31, 2011), to collect information from COBRA-eligible individuals who would have been eligible for the subsidy except for the timing. Data collection for the subsidy-ineligible sample will focus on individuals from both time periods.

Data collection for the study will take place over a six-month period beginning as soon as OMB clearance is received. Since not all UI recipients belong to the target population, the study will use a two-stage data collection process. Stage 1 will screen sample members for eligibility for the survey and determine to which of the study groups an individual belongs, and Stage 2 will collect the data required for the evaluation. In Stage 1, the random sample of UI recipients will be asked whether they had employer-sponsored health insurance at the time they lost their job; this is to determine

whether the person is eligible for COBRA, a requirement for participation in the full survey. Before being screened out, people who did not have coverage will be asked if their employer offered coverage and, if so, whether they were eligible for it. This information will provide insights into why job losers are not eligible for COBRA. People who did have coverage (i.e., those eligible for COBRA) will be asked questions about Medicare and availability of other coverage to determine which of the three study groups they belong to.

Sample members who pass the screener will be administered the full survey until the target sample sizes of each study group are reached. The full COBRA Subsidy Study Survey includes a set of modules that encompass demographic characteristics; employment and job search; income, program participation, and financial well-being; and, most important, health care use and type, knowledge of COBRA health insurance and of the ARRA COBRA subsidy, health status of the worker and his or her family, and unmet health needs. Below are the types of data elements that will be collected in the survey.

- **Demographic, household, and area characteristics** include items such as age, gender, race/ethnicity, education, marital status, household composition and size, and characteristics of the local area.[1] This information will be used to describe the samples, and as factors that could influence the decision to enroll in COBRA coverage.

- The **employment and work search** modules will be used to collect information on the characteristics of the job prior to separation and subsequent jobs, including such information as hours worked and earnings, industry and occupation, benefits offered on the job, reasons for job separation, whether the person looked for work and reasons for not looking, time spent looking for employment, and reasons for rejecting offers received. Information on employment prior to job loss will be used to describe the samples and as predictors of outcomes, while information on employment after job loss will be used as outcomes. Information will also be collected about expectations of finding employment at the time of job loss.

- **Income and its sources** includes items such as spousal earnings; income from interest, dividends, and rent; income received from participation in various programs, including UI, food stamps (or Supplemental Nutrition Assistance Program), welfare or general assistance, Social Security at the time of job loss; and monthly income at the time of job loss. In addition to its influence on COBRA enrollment, this information will be used to determine subgroup impacts by income and poverty status at the time of job separation. Furthermore, information on participation in programs after job loss will be collected and used as an outcome measure.

- **Financial well-being** includes items such as the types of loans, trouble making bill or loan payments, food insufficiency, and amount of savings. When these items are measured at the time of job loss they represent factors that could influence COBRA take-up. When they are captured twelve months after job loss, they reflect outcomes that could be affected by loss of health insurance (and hence might be influenced indirectly by the offer of the subsidy).

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[1] Characteristics about the local area will be obtained by linking the zip code information in the UI administrative data to secondary data sources.

- **Health and health care utilization** include items such as self-reported health status, use of medical care before and after job loss, and the individual's own and family members' health insurance coverage before and after job loss. Some measures, such as health status and use of medical care *prior* to job loss, might influence COBRA take-up. Others, such as health status and use of medical care *after* the time of job loss, reflect key outcomes that could be influenced by the availability of the subsidy.

- **COBRA and ARRA subsidy awareness and eligibility** include items such as knowledge of the program, whether the worker was aware of various details of each program and whether they were eligible, how he or she was informed, whether the information was easy to follow, and reasons for participating or not participating. This information will provide a context for understanding how people learn about the programs, and other factors that might be related to why they did or did not use COBRA coverage or use the subsidy.

c   Purpose of the Data

Table A.1 links the data elements to their source—survey, screener, or UI data—and primary use in the study. The table provides a justification for why survey questions capturing items in each data element were developed for the survey and how they will be used in the study's analysis. Data will be collected for one of five uses: (1) descriptive/contextual; (2) covariate/background; (3) outcomes; (4) key impact outcome; and (5) stratification. Information collected for descriptive/contextual purposes will provide a context for interpreting the impact of the subsidy and the factors correlated with COBRA take-up, while information collected for covariate/background purposes will be used as correlates of the health insurance decisions. Information collected as outcomes will be used to highlight the myriad of ways in which the subsidy's availability might affect the lives of individuals who lost their job. Information collected as key impact outcomes will be formally modeled in the impact analysis as influenced directly or indirectly by the ARRA subsidy. Some of the covariate/background information will also be used as categories of subgroup analysis.

Depending on the nature of the data elements, variables will be measured at one or more of three points in time—at the time just prior to job loss, at six or twelve months after job loss, and the time between job loss and time of survey. The data elements measured just prior to job loss are intended to capture the factors that are likely to have influenced the recipient's health insurance decisions, and that provide background information on the sample and that can be used as covariates in our analyses. Data elements measured at six or twelve months after job loss will capture the more proximal changes in individuals' circumstances that result from job loss and potential loss of employer health insurance – including health care utilization and financial well-being. Data elements that capture experiences from the time of job loss to time of survey include key outcomes such as employment and health insurance coverage that are likely to be influenced by the offer of the subsidy and will also help inform the cost-benefit of the offer and take-up of subsidies. As shown in Table A.1, data elements measured after job loss will generally be used as outcomes while those measured at job loss will generally be used as covariates in multivariate analysis to predict outcomes or as descriptive, background measures to provide characteristics of individuals who were eligible for the subsidy (for example).

Table A.1 Data Elements and Use

	Information Source	Descriptive/ Contextual	Covariate/ Background	Outcomes	Key Impact Outcomes	Stratification Variable
Demographic, household, and area characteristics						
Demographic characteristics: Age, gender, race and ethnicity, education, marital status	Survey		X			
Household characteristics: Household composition and size, children outside the house, employment status of adult household members	Survey		X			X
Area characteristics: Zip code most recent address(used to link to secondary data)	UI data		X			
Employment and work search						
Employment before job loss						
Earnings, hours worked, occupation, industry, benefits offered, separation reason, firm size < 20, seasonal/temporary job, represented by union, company move or close	Survey		X			
Date of job separation	UI data	X				
Employment after job loss						
Duration of initial unemployment spell	Survey			X	X	
Other job characteristics (after UI claim): Earnings, hours worked, occupation, industry, benefits offered, start and stop date, separation reason, firm size < 20, seasonal/temporary job, union member, represented by union	Survey			X		
Current employment: Earnings, hours worked, benefits offered, seasonal/temporary job, Occupation, industry, firm size < 20, union member, represented by union?	Survey			X		
Work search activity: Looked for work, reasons not working and rejecting job offers	Survey			X	X	
Income and its sources						
Income at job loss						
Monthly income prior to job loss	Survey		X			X
Spousal earnings, interest, dividends, rent, program participation, welfare, Social Security, etc. (including sources)	Survey		X			
Income after job loss						
Number of months and average income from each source	Survey			X		
Current monthly income	Survey			X		
Financial well being						
Time of job loss						
Living arrangement (own home, rent, etc.)	Survey		X			
Type and amount of debt	Survey		X			
Savings: for 3 months living expenses, 6 months, total	Survey		X			
12 months following job loss						
Trouble making bill/loan payments (which ones)	Survey			X		
Moved, sold valuables, withdraw from retirement savings to pay bills	Survey			X		
Bankruptcy, home foreclosure	Survey			X		
Food insufficiency	Survey			X		
Health and health care utilization						
Health at time of job loss						
Self reported for self and family	Survey		X			X
Conditions that limited work	Survey		X			
Chronic health conditions (self and family)	Survey		X			
Pregnancy	Survey		X			

	Information Source	Descriptive/ Contextual	Covariate/ Background	Outcomes	Key Impact Outcomes	Stratification Variable
Health at the time of the survey						
Self rating of health				X	X	
Condition that limits the amount of work				X		
Health care use 6 months after job loss						
Physician visits increase, decrease, same (as 6 months prior to job loss)				X		
Prescription medicine use increase, decrease, same (as 6 months prior to job loss)				X		
Health care coverage at job loss						
Covered by employer's plan (reason why not)	Screener	X				
Adequacy of plan, whether covers doctors want to see	Survey		X			
Monthly premium	Survey		X			
Covered by another plan (besides employer's plan)	Survey		X			
Health care coverage since job loss						
Enroll in any health insurance coverage immediately after job loss				X	X	
Current coverage, start date, monthly premium, eligible for Medicare	Survey			X		
Other coverage since job loss: source, reason end, gaps (self and family), months, medical needs and financing	Survey			X		
Change in health status (6 months before/after job loss): self or family, doctor visits, use prescriptions, emergency room visits	Survey			X		
COBRA and subsidy awareness						
COBRA						
Enrollment in COBRA after job loss	Survey			X	X	
Family members enrolled in COBRA	Survey			X		
Reasons participating (or not)	Survey	X				
Duration of COBRA enrollment	Survey			X	X	
Reasons not eligible for COBRA (ineligible for employer-sponsored insurance, eligible but not enrolled)	Screener	X				
Reason ended	Survey	X				
Coverage without COBRA	Survey	X				
Monthly premium	Survey		X			
Would enroll in COBRA if: 90%, 80%, 65%, 35% subsidy	Survey	X				
COBRA awareness: knowledge of, familiarity with, how informed, ease of information	Survey	X				
ARRA subsidy: use assistance, start and stop date, reason not take up subsidy	Survey	X				
ARRA subsidy awareness: knowledge of, familiarity with, how informed, ease of information	Survey	X				

Notes   Data elements marked in the "Descriptive/Contextual" column will be used to provide a context for interpreting the impact of the subsidy and the factors correlated with COBRA take-up. These data include stated reasons for health insurance decisions, reasons for COBRA or subsidy ineligibility, and knowledge of the programs. The "Covariate/Background" column indicates factors determined at or before the time of job loss that may be correlated with health insurance decisions. These will be used both in descriptive analyses comparing groups based on COBRA or subsidy eligibility status, and as covariates in the impact analysis. Data elements marked in the "Outcomes" column are variables measured after the time of job loss. The distributions of these variables will be compared among the study groups. A subset of these, marked as "Key Impact Outcomes" will be used as outcomes in the formal impact analysis since they are likely to be impacted directly or indirectly by the availability of the subsidy. The impact analysis will be performed on subgroups defined based on data elements marked in the "Stratification Variable" column.

d.   Who Will Use the Information

DOL will use the information from the data collection to assess the effect of the ARRA subsidy on COBRA enrollment. The information will answer DOL's questions about impacts of the benefit of the subsidy on the health and employment of those that involuntarily lose their job. DOL will also use the new information about the broader COBRA-eligible population to gain a better understanding of the decision to enroll in COBRA coverage and of the outcomes associated with not enrolling.

Data collected will be released as a public use file without personally identifiable information, so that public policy and social science researchers will have access to the rich source of data collected. Additional research based on this data set may expand on this study's initial goals, and further analyses tailored to a particular situation may inform specific policy decisions related to health insurance coverage. As a result, research used to develop policy initiatives to promote health care coverage and positive health outcomes will be grounded in a stronger knowledge base. The public use data file will be formatted to the specifications of data.gov for uploading.

Ultimately, these data will benefit researchers, policy analysts, and policymakers in a wide range of program areas. The data collection will enable the study to create a better understanding of the health insurance decisions of people who lose a job. Measuring the effect of the ARRA subsidy on COBRA enrollment may inform the efficacy of other public programs aimed at increasing health care coverage. Additional analyses will provide valuable information on potential barriers to health care enrollment and on the types of individuals and families at greatest risk of becoming uninsured.

3.   Use of Improved Technology to Reduce Burden

A dual-mode approach will be used to facilitate the anticipated high volume of screening required to identify the survey sample. Sample members will be screened either (1) by calling in to a state-of-the-art interactive voice response (IVR) system;[2] or (2) by speaking with a Mathematica interviewer. The IVR was selected because it will help screen out large numbers of people who would not have been eligible for COBRA coverage in the relevant time periods and thus decrease the costs of contacting sample members. The IVR system is also expected to increase response rates by appealing to a subset of sample members who prefer this option and might not respond to interviewer-initiated contact attempts. It is also helpful in connecting with sample members for whom the telephone contact information obtained from the UI administrative records is invalid, since some of these sample members will call in on their own.

The IVR pre-screening interview is designed to place minimal burden on the respondent because it is easy to understand and can be completed in about two minutes. After answering a few questions to confirm their identity, sample members will answer one pre-screening question to determine their eligibility for the study. Sample members who do not pass the screen will be asked two additional questions to gather some information about their ineligibility for COBRA. These questions all require a yes or no response, and the IVR will be programmed to use appropriate skip logic. Ineligible sample members will be thanked for calling in and told that they have not been selected for the study. Sample members who are "screened in" to participate will be transferred to

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[2] IVR technology involves the use of a touch-tone telephone to interact with a database to enter into or acquire information from the database.

an interviewer at Mathematica's Survey Operations Center (SOC) to complete the screening process and full interview, if appropriate. A dedicated line at the SOC will accept these IVR transfer calls so that interviewers are alerted to the source of the call and will enter a code that ensures that the proper question fills and paths are followed.

The IVR will be administered by Interviewing Services of America (ISA), a company experienced in developing and administering IVR systems. All respondents who indicate that they were covered by employer-sponsored health insurance at the time of their job loss will be transferred to the SOC to complete the screening, verification, and interviewing process. Sample members who report no such coverage will be screened out after reporting whether their employers offered health insurance and their eligibility for it. Sample members who opt to call in to speak with a live interviewer (or who are called by an interviewer) will complete the same pre-screening questions as those who call into the IVR. These questions, and the full interview, will be conducted with computer-assisted telephone interviewing (CATI). CATI will work efficiently in conjunction with the IVR, as sample members who are identified as potentially eligible by the IVR will be able to continue the interview in CATI immediately upon transfer to Mathematica's SOC. The IVR was not considered for the full survey for several reasons, including the length of the interview, inclusion of open-ended questions, and the need for probing.

CATI was selected as the data collection mode for the full survey because telephone interviews are more cost-effective and less burdensome on respondents than in-person interviews, given the flexibility they allow for scheduling. CATI also increases efficiency and decreases burden on respondents compared to paper-and-pencil interviewing because it accepts only valid responses and can be programmed to check for logical consistency across answers. Interviewers are thus able to correct errors during the interview, eliminating the need to call back respondents to clarify or obtain missing data. To aid respondents' recall of events, the CATI program will be preloaded with useful information from the UI administrative data file, such as the job separation date, UI claim date, and the name of the employer associated with job separation shortly before the initial UI claim. CATI is also beneficial because it virtually eliminates dialing errors by making calls through an auto-dialer linked to the system. The automated call scheduler will simplify scheduling and rescheduling of calls to respondents at their convenience and can assign cases to specific interviewers, such as those fluent in Spanish.

4. Efforts to Identify Duplication

An estimate of the impact of the ARRA subsidy on enrolling in COBRA and on health and other outcomes can be computed using data collected. Information needed to estimate such impacts goes far beyond what is available. No other data collection effort has been conducted or planned that would provide the information needed to estimate this impact. Further, to avoid duplication in with other ongoing studies of the UI population this study has coordinated efforts with Mathematica's DOL-funded evaluation of the Unemployment Compensation Provisions of ARRA.

5. Methods to Minimize Burden on Small Businesses or Entities

Small businesses and other small entities are not required for this data collection effort.

6. Consequences of Not Collecting the Data

Data will be collected only once. The COBRA Subsidy Study Survey will provide the only source of data for UI recipients on eligibility for and familiarity with COBRA and familiarity with

the ARRA subsidy in addition to data on health and health insurance before and after job loss. If the COBRA Subsidy Study Survey were not conducted, the impact of the ARRA subsidy for COBRA enrollment would remain unknown as would a description of who used the subsidy.

7. Special Data Collection Circumstances

All federal guidelines will be strictly adhered to in the collection of all data required for the COBRA Subsidy Study. There are no special circumstances that would require straying from such strict adherence.

8. Federal Register Notice

a. Federal Register Notice and Comments

As required by 5 CFR 1320.8 (d), a Federal Register Notice, published on December 12, 2011 (FR, Vol. 76, No. 238, pp. 77263-77264), announced the study of the Impact of the ARRA Subsidy on COBRA Take-Up and provided the public an opportunity to review and comment on the planned data collection and evaluation. Comments from this notice were due within 60 days of the publication, in accordance with the Paperwork Reduction Act of 1995. A copy of this 60-day notice is attached as Appendix A. A second Federal Register Notice will be published for a 30-day period, coinciding with submission of this OMB clearance request, and will provide the public a second opportunity to respond. No comments were received from the public during the initial 60-day posting.

b. Consultations Outside the Agency

To ensure that the best decisions were made regarding the research, sample, and questionnaire designs for the study as well as for the data collection plans, experts from outside the agency were consulted, and their input has helped to shape the evaluation. These experts included project staff from Mathematica and members of the project's Technical Working Group. The experts consulted are listed below, along with telephone contact information.

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Ms. Yingying Xu, Program Analyst	(609) 750-4043
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Dr. Brigitte Madrian, Professor of Public Policy,
   Harvard University   (617) 495-8917

9. Respondent Payments

We will employ several proven methods to ensure a high response to the COBRA Subsidy Study Survey. One such method is the offer of an incentive to survey completers, which can help increase cooperation among sample members and thus help increase response rates. High response rates, in turn, help achieve sample representativeness, which is critical to achieving high data quality—that is, data that are complete, valid, reliable, and unbiased. Offering incentives can help achieve these goals. The offer of incentives will be coupled with other methods known to increase response, such as good techniques for locating mobile sample members; refusal avoidance; persistent and professional contact protocols, including the use of agency letterhead for mail contact; and high refusal-conversion rates. Declining response rates in telephone surveys (Curtin et al. 2005) and the concomitant rise in effort and costs associated with achieving high response rates have made the use of incentives a more common practice for survey studies. Evidence on the benefits of offering incentives has become available in the last several years. Incentives can help achieve high response rates by increasing the sample members' propensity to respond (Singer et al. 2000). Studies offering incentives show decreased refusal rates and increased contact and cooperation rates. Among sample members who do initially refuse to participate, incentives increase refusal-conversion rates. By increasing sample members' propensity to respond, incentive payments have been found to significantly reduce both the number of calls required to resolve a case and the number of interim refusals. Thus, incentive payments help contain costs, and pass some of the costs of conducting the survey as a gain to the participant rather than into additional survey operations.

Last, while incentives help gain cooperation to increase the overall response rate, they also increase the likelihood of participation from subgroups with a lower propensity to cooperate with the survey request. This is an important consideration for ensuring the representativeness of the survey respondents and the quality of the data being collected. For example, Jäckle and Lynn (2007) found that incentives increased the participation of sample members more likely to be unemployed, a key characteristic of the sample for the COBRA Subsidy Study. There is also evidence that incentives bolster participation among those with lower interest in the survey topic (Schwartz et al. 2006; Jäckle and Lynn 2007; Kay 2001) resulting in data that is more nearly complete. In the case of the COBRA Subsidy Study, sample members who are working and now insured, may be less interested in participating in this study than those who are unemployed or uninsured; an incentive offer will likely bolster participation among this important group. Further, paying incentives does not impair the quality of the data obtained (such as item nonresponse or the distribution of responses) from groups that would otherwise be underrepresented in the survey (Singer et al. 2000).

An incentive payment will be offered to all respondents who are determined eligible and who complete the full survey. No incentive will be offered or paid to respondents who complete only the screening interview. A payment of $50 will be offered to respondents who use the IVR for initial screening and complete the survey within four weeks of receiving the invitation, and $40 will be offered to non-IVR completers or to IVR completers who complete the survey after the four-week window. Because of the high volume of screening required (an estimated 22,000 to 26,000 interviews), and the fact that many sample members will not pass the eligibility screens, the higher incentive offer is intended to encourage early use of the IVR. Increased use of the IVR will help to reduce interviewing costs by eliminating time and labor spent attempting to reach households and conducting the screening questions. In addition, it will reduce locating costs by encouraging call-ins, as some sample members will have outdated contact information. The potentially significant cost savings of screening sample members through the IVR makes it worthwhile to encourage as many sample members as possible to use this system and justifies offering them a slightly higher incentive.

The importance of achieving a high response rate and preventing differential attrition across research groups makes offering incentives a critical addition to our intensive efforts to successfully establish contact with prospective respondents and gain their cooperation with the planned data collection. To leverage fully the benefits of offering incentives in the COBRA Subsidy Study, the incentive offer will be mentioned in our advance letter to sample members, making it clear that it will be provided to "eligible survey completers." To help gain cooperation, interviewers will also mention the proposed incentive when they determine that a sample member is eligible for the study.

Mathematica has conducted several studies of the general UI claimant population as well as studies for which the UI claimant population served as the sample frame. The planned incentive amount for the COBRA Subsidy Study is on par with those studies which used similar methodology and used the UI claimant population as a sample frame, as in the Impact Evaluation of the Trade Adjustment Assistance Program (TAA study) for the DOL. For example, Mathematica recently conducted an incentive experiment as part of the TAA study, in which non-respondent sample members were offered one of three incentive amounts—$25 (the status quo), $50, and $75—in a split-ballot experiment to evaluate the impacts of the incentive protocol. Responses were also tracked by whether the sample member was in the TAA group that had received services or not, and their comparison group counterparts. Finally, a number of procedural changes were also implemented and their effectiveness assessed. Response rates increased from 41 percent to 55 percent overall after the higher incentives were offered, and increases ranged from 8.7 percentage points to 15.8 percentage points for each of the four groups examined.[3] In particular, response rates increased from 53.7 percent with an incentive offer of $25 to 62.4 percent after an increased incentive offer of $50 to $75 for group A. Similar differences were observed for the other three groups, with response rates increasing from 37.0 percent to 52.8 percent for Group B, from 42.7 percent to 57.2 percent for Group C, and from 34.4 percent to 50 percent for Group D. (See Appendix B for a detailed memo describing the TAA experiment.)

Based on the results of the experiment, the incentive offer for the TAA study was increased to $50 for both existing, non-responding sample members and for newly released sample members. The differences in response between the $50 and $75 incentive groups were not significant. The

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[3] The four groups, referred to as A, B, C, and D, represent TAA participants, TAA-eligible nonparticipants, and their respective comparison groups.

proposed $40 and $50 incentive amounts for the COBRA Subsidy Study are, therefore within the range of amounts that have been provided in other federal surveys of similar populations. In the TAA study, much of the improved response came through an increase in the number of call-ins by sample members.

10. Privacy

Participants will receive assurances of privacy in an advance letter and a study information sheet describing the survey (see Appendix C) and again at the outset of the interview as part of the introductory script. Sample members who call the IVR will also be told, in the prerecorded message, that all answers will be kept private. In addition, if an IVR caller is connected to the SOC to complete screening and interviewing, they will be transferred to a project-specific phone line where their information will be verified and privacy assurances repeated.

Interviewers will be trained in privacy procedures and will be prepared to describe them in full detail, if needed, and to answer any related questions raised by participants. A set of frequently asked questions (FAQs) and responses has been developed to assist interviewers with inquiries. These FAQs are incorporated into the CATI program and can be accessed by interviewers at any point in the interview. They include responses to generic questions typically encountered in surveys as well as questions and answers specific to the COBRA Subsidy Study. For example, if asked about how their answers will be used, the interviewer will explain that individual answers will be combined with those of other respondents and presented in summary form only and used for research purposes only—for example, "Blank percent of respondents reported that they are now employed." Further, respondents will be reassured that their names will never be used in any reports or other documents provided to DOL or any other agencies.

All data items that identify respondents will be kept only by the evaluator contractor (Mathematica) and by ISA, for use in assembling records data and in administering the screening and full interviews. Any data DOL receives will contain no personal identifiers, thus precluding individual identification.

It is the policy of Mathematica to efficiently protect private information and data in whatever medium it exists, in accordance with applicable federal and state laws and contractual requirements. In conjunction with this policy, all Mathematica staff shall:

1. Comply with the company's Confidentiality Pledge, which is signed by all full-time, part-time, and hourly Mathematica staff, and with Mathematica's Security Manual procedures to prevent the improper disclosure, use, or alteration of private information. Staff may be subjected to disciplinary and/or civil or criminal actions for knowingly and willfully allowing the improper disclosure or unauthorized use of private information.

2. Access private and proprietary information only in performance of assigned duties.

3. Notify their supervisor, the project director, and the Mathematica Security Officer if private information has been disclosed to an unauthorized individual, or used or altered in an improper manner. All attempts to contact Mathematica staff about any study or evaluation by individuals who are not authorized access to private information will be reported immediately to both the cognizant Mathematica Project Director and the company's Security Officer.

In addition, many Mathematica staff, including some COBRA project staff, have received security clearance from the Social Security Administration and are experienced with the stringent security requirements of collecting sensitive and personally identifying information.

To allow external verification and replication of the study findings, as well as additional research, a public use data file containing key analysis variables created for the COBRA Subsidy Study will be produced at the end of the study. The public use file that is produced will follow the current OMB checklist on privacy to ensure that it can be distributed to the general public for analysis without restrictions. Steps will be taken to ensure that individual study participants cannot be identified in indirect ways. For example, categories of a variable will be combined to remove the possibility of identification due to a respondent being one of a small group of people with a specific attribute. Variables will also be combined in order to provide summary measures to mask what otherwise would be identifiable information. Variables we will carefully scrutinize include age, race/ethnicity, household composition, location, household income and assets, and rare health conditions. We will scrutinize these and other such variables for small cell sizes and outliers, as well as combinations of variables that could potentially lead to any identification. Depending on the nature of the responses we find, we will either top-code or categorize outliers, and/or combine data in neighboring cells as needed. Statistical methods will be used to add random variation within variables that would be otherwise impossible to mask, if necessary. Finally, variables that could be linked to identifiers by secondary users will be removed. Additional research based on the public use data set may expand on this study's initial goals, and further analyses tailored to a particular situation may inform specific policy decisions related to health insurance coverage.

a. General System Security Description

Mathematica's computer facilities include state-of-the-art hardware and software. The hardware and software configurations have been designed to facilitate the secure processing and management of both small- and large-scale data sets.

1. Facility

The doors to Mathematica's office space and SOC are always locked, and all SOC staff are required to display current photo identification while on the premises. Visitors are required to sign in and out and must wear temporary ID badges while on the premises. Any network server containing private data must be in a controlled, limited-access area. All authorized external access is through a server under strict password control.

2. Network

Data stored on network drives is protected with the security mechanisms available through the network operating system used on our primary network servers: Novell Netware 5 – 6.5. These versions of Novell Netware are compliant with the C2/E2 Red Book security specifications. Netware is certified at the National Computer Security Center's Trusted Network Interpretation Class C2 level of security at the network level. The network is protected from unauthorized external access through the PIX Firewall from CISCO. This firewall resides between our network and the communications line over which our Internet traffic flows.

Access to all network features, such as software, files, printers, Internet, email, and peripherals, is controlled by userid and password. Network passwords must contain a minimum of eight characters and must be a combination of numbers and letters. All userids, passwords, and network

access privileges are revoked within one working day for departing staff and immediately for terminated staff. All staff are required to log off the network before leaving for the day.

3.   Printers

Printer access is granted to all staff with a valid userid and password. The physical hard disks on which the printer queues reside are subject to the same security/crash procedures that apply to the file servers. Printer stations are appropriately monitored according to the sensitivity of the printed output produced. No private or proprietary data or information can be directed to a printer outside Mathematica's offices.

4.   Electronic Communication

Ethernet is used for internal email communications over the network. As Ethernet communications use Novell Netware with built-in userid and password protections and Windows NT Challenge Handshake Authentication Protocols, sensitive information in both email text and attachments can be safely transmitted. Email transfer is also encrypted when sent to or from the Mathematica gateway facility, which allows staff to check and send emails from home. A dedicated private line supports cross-office communications between Mathematica's offices.

b.   Treatment of Data with Personal Identifying Information

All data containing personal identifying information (PII)—including SSN, name, home address, date of birth, and telephone number—are considered to be sensitive, or private, data. The COBRA Subsidy Study is in compliance with the aforementioned company security policies. Listed below are specific details regarding the handling and processing of private information in this evaluation.

1.   Access

Private electronic files are stored in restricted-access network directories. Access to restricted directories is limited on a need-to-know basis to staff who have been assigned to and are currently working on the project. When temporarily away from their work area, project staff are instructed to close files and applications. Access to their workstations locks within a set number of minutes, and they must use a password to regain access through the protected screen saver.

2.   Electronic Communication

Staff are forbidden to transmit sensitive study information as a regular file attachment to an internal email; they are instructed instead to use the "insert shortcut" feature in Outlook to include a shortcut to the file. This allows the receiver to go to the file directly but will not allow access to unauthorized individuals. In addition, staff are instructed to avoid including sample member names or other PII in internal emails, so that there is no potential for these to be viewed by others.

Emails sent outside Mathematica are not automatically encrypted, and therefore neither the text nor attachments are secure. Before sending an email containing sensitive information, the sender is obligated to ensure that the recipient is approved to receive such data. When files must be sent as attachments internally and outside Mathematica, staff are instructed to use WinZip 9.0 (256-bit AES encryption) to password-protect the file. When sample member name and contact information are

sent outside Mathematica, the information is included in a secure attachment rather than in the text of the email.

3.   COBRA Subsidy Study Databases

Project databases containing private information are password protected and accessible only to staff currently working on the project. To access the project's database, users must first log onto their workstations and then upon starting the database, log in again using a separate prompt. Project databases will be removed and securely archived at the end of the data-processing period.

4.   Telephone Interviewing

Telephone interviewers for the COBRA Subsidy Study Survey will be seated in a common supervised area. As part of the verification process, interviewers will have access to respondents' names and birthdates, as well as the last four digits of their SSN. Birthdate and last four SSN digits will be displayed on the computer screen only during the sample member verification. Interviewing staff for this project receive training that includes general SOC security and privacy procedures, as well as project-specific training that includes explanation of the highly private nature of this information, instructions to not share it or any PII with anyone not on the project team, and caution about the consequences of any violations.

5.   Locating

Staff who work on updating sample member contact information when the original contact information is not successful must have access to key identifying information for short periods. Locating staff receive training that includes general SOC security and privacy procedures, as well as project-specific privacy training with clear instructions on what data and databases can be accessed and what data are required and can be recorded.

Locators may talk to sample member's family, relatives, or other references to obtain updated contact information. To protect the sample member, locators are given scripts on what they can and cannot say when using these sources to obtain information. For example, interviewers will be instructed not to tell anyone that the sample member has been selected to participate in a study of COBRA. Rather, they will indicate that Mathematica is trying to reach the sample member for an important study sponsored by DOL.

6.   Locating and Calling Contact Sheets

Project team members keep only the minimum amount of printed private information needed to perform assigned duties. Hard-copy materials (such as locating or calling contact sheets) containing data with any individual-level identifiers (e.g., name, street address) are stored in a locked cabinet/desk when not being used. When in use, such materials are carefully monitored by a project supervisor and are never left unattended. At the conclusion of the project, a complete disposition of all remaining sample will be conducted, and the contact sheets and other associated materials will be either archived or destroyed per agreement with DOL's Project Officer.

7.   Hard-Copy Printouts

Sensitive temporary work files, used to create hard-copy printouts and stored in temporary work files on local hard drives, are deleted on a periodic basis. Private hard-copy output that is no

longer needed is shredded or stored securely. Test printouts of data records carrying personal identifiers that are generated during file construction are shredded.

8.   Data Files

When possible, electronic files without personal identifiers are created for everyday use. Data and sample files that must contain sensitive data are stored in a restricted-access location on the network. Access to data and sample files is granted only at the request of the project director (Anu Rangarajan) or the survey director (Julita Milliner-Waddell). This folder is restricted to staff who are currently working on the project and is available only to the staff who must have access to all the sample information to select and process the sample or to process the data files. Sensitive data that are no longer needed in the performance of the project will be magnetically erased or overwritten using Hard Disk Scrubber or equivalent software, or otherwise destroyed.

To carry out data collection using the IVR, our IVR vender, ISA, will need data about sample members. All data transmission between ISA and Mathematica will take place via a secure site, and all files will be encrypted and password protected. ISA will sign a project-specific services agreement with Mathematica and will comply with all privacy protocols set forth in this clearance request. ISA agrees to maintain the privacy of all information it receives as part of this study.

11. Questions of a Sensitive Nature

Sections C and D of the survey of UI recipients being conducted for the COBRA Subsidy Study contain some questions—about employment and health insurance—that may be considered sensitive by sample members who have been unemployed or without health insurance for a long time. Some questions about health status, chronic health conditions, and medical visits and expenses (Section F), income and participation in transfer programs (Section G), and financial well-being (Section H) may also be considered sensitive by some sample members. Obtaining information about these potentially delicate topics is integral to addressing the research questions posed by the study, both in order to describe the characteristics of COBRA- and subsidy-eligible individuals, to describe the characteristics of COBRA enrollees, to describe the outcomes that these groups experience, and to assess the impact of the subsidy on COBRA enrollment. The health of the worker and dependents at the time of job loss and the income and financial ability to purchase COBRA are critical influences on COBRA enrollment. Information on employment and health insurance will also be critical for conducting a cost-benefit assessment to the government of offering the subsidy.

The survey questions have been worded to show the highest level of objectivity and sensitivity. Interviewers will also be trained to show sensitivity to respondents while remaining impartial. In addition, many questions in the current survey have been included without modification from other surveys of similar populations, such as the TAA Evaluation, the Accelerated Benefits Demonstration, and the National Survey of American Families, and have been used extensively with no evidence of harm. All questions in the current survey, including those deemed potentially sensitive, have been thoroughly pretested.

Further, as described in section 10, all participants will be assured of privacy at the outset of the interview. All survey responses will remain private and will be reported in aggregate in any reports or publically available documents, summary format, eliminating the possibility of individual identification.

12. Hour Burden of the Collection of Information

The screening survey for the COBRA Subsidy Study can be completed with either an IVR or an interviewer. The questions are designed to determine whether the sample member was eligible for COBRA benefits at the time of job loss, as those who do not meet this broad criterion will be ineligible for the study. After their identity is verified and a callback number collected, COBRA-eligible sample members will answer and confirm one screening question before being transferred to an interviewer at Mathematica. Sample members who do not meet the eligibility criterion for the study (participation in an employer-sponsored health plan at job loss) will answer a maximum of three screening questions. The screening interview is estimated at two minutes for both groups of respondents. A copy of the IVR screening questionnaire is included as Appendix D. Completion of the full survey for eligible sample members is estimated at 45 minutes. A copy of the full COBRA Subsidy Study Survey instrument is in Appendix E.

The time burden for administering the study eligibility screening interview is estimated at between 733 and 867 hours for the anticipated 22,000 to 26,000 screener respondents. For the full interview, the total estimated time burden is 4,350 hours for the projected 5,800 respondents. These estimates, presented in Table A.2, are based on timing tests conducted with Mathematica staff and on pretests conducted with individuals who met the study criteria. Pretest respondents were referred by Mathematica staff. Hard copy instruments were used to administer the pretest interviews which ranged from 35 to 59 minutes, for an average of 51 minutes. However, we expect to realize a reduction in administration time of between five and eight minutes, because of the efficiencies that will be gained by using CATI.

Table A.2 Burden Estimates for COBRA Subsidy Study Respondents

	COBRA Subsidy Study Survey	
	Screeners[4]	Full Interviews
Number of Respondents	22,000 – 26,000	5,800
Responses per Respondent	1	1
Minutes per Response	2	45
Total Respondent Burden (Hours)	733 – 867	4,350
Total Burden Cost	$10,555 - $12,485	$62,640

The total burden cost of conducting this survey is estimated to range between $73,195 and $75,125. This cost represents the time to complete both screening and full interviews multiplied by the number of projected respondents at an estimated average hourly wage of $14.40 per hour.[5]

13. Estimated Total Cost Burden to Respondents and Record Keepers

There will be no financial costs borne by respondents.

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[4] Since the best estimate for the number of screeners ranges from 22,000 to 26,000 respondents, the total burden for screeners is presented as a range, not to exceed 867 hours or $12,485.

[5] This hourly wage estimate is the midpoint of wages reported by participants in another DOL study: the initial Individual Training Account Evaluation. In that study, hourly wages for the ITA study participants ranged between $13.60 and $15.20 (McConnell et al. 2006).

14. Estimated Annualized Cost to the Federal Government

The total cost of the study to the federal government is $3,499,443. Over the two-year study period, this translates to an annualized cost to the federal government of $1,749,721. These costs include the following major expense categories required to conduct this study of the Impact of the ARRA Subsidy on COBRA Take-Up:

Table A.3 Cost to the Federal Government

Activity	Cost
Kickoff Meeting	13,508
Develop Workplan, Evaluation, Design & Analysis Plans	89,968
Sample Frame & Survey Design	360,000
Questionnaire Development	51,953
OMB Clearance	42,852
Obtain UI Administrative Data	130,000
Survey Management	225,000
Survey Operations – Interviewing[6]	1,606,373
Survey Operations – Locating	155,000
Survey Operations – QC	55,000
Survey IS Programming	140,000
Technical Work Group Meetings	102,070
Data Analysis	180,879
Report Writing	186,635
Client Briefings	33,217
Public Data File	71,734
Project Management	55,254
Total Cost to the Government	**$3,499,443**

15. Changes in Burden

This is a new data collection effort. Therefore, there are no changes in burden.

16. Publication Plans and Project Schedule

a. **Tabulations**

The COBRA Subsidy Study Survey will be used to examine:

1. *Impact on COBRA enrollment of a 65 percent subsidy,* including duration of enrollment and other outcomes (e.g., health, health care coverage, employment).

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[6] Represents the costs of screening, administering the 45-minute survey, including costs for all mailings and contact attempts, and incentives.

2. ***Characteristics of job losers who are eligible for COBRA (and the ARRA subsidy),*** including the reasons for people are ineligibles for the program.

3. ***Characteristics of job losers who enroll in COBRA,*** including their reasons for enrolling and a comparison to the characteristics of job losers who do not enroll in COBRA and their reasons for not enrolling.

Additional details on the estimation of overall impacts, impacts by subgroup, and descriptive analysis are provided in section 2 of Part B.

b.   Project Schedule and Publication Plans

The project schedule for data completion and publication is in Table A.3.

Table A.4 Timeline for Data Collection and Publication

Tasks	Schedule
Administer COBRA Subsidy Study Survey	May 2012 to November 2012 (pending OMB approval)
Mathematica briefs DOL staff on study findings	September 2013
Create public use data file	August 2013 to September 2013

17. Reasons for Not Displaying Expiration Date of OMB Approval

The expiration date issued by OMB for this data collection will be included with all materials sent to sample members.

18. Exception to the Certification Statement

Exception to the certification statement in item 19 of Form 83-I is not requested for this data collection.

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