

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Necessity of the Information Collected

The purpose of this request for review is for the Bureau of Labor Statistics (BLS) to obtain clearance for the Disability Supplement to the Current Population Survey (CPS). This supplement is scheduled to be conducted in May 2012. The supplement questions concerning disability are shown in Attachment A. As part of the CPS, the supplement will survey individuals ages 15 and over from a nationally representative sample of approximately 60,000 U.S. households. The supplement will be sponsored by the Department of Labor's Office of Disability Employment Policy (ODEP).

The CPS has been the principal source of the official Government statistics on employment and unemployment for over 70 years. Collection of labor force data through the CPS helps BLS meet its mandate as set forth in Title 29, United States Code, Sections 1 through 9 (Attachment B).

2. Needs and Uses

The Americans with Disabilities Act (ADA) of 1990 established civil rights protections for individuals with disabilities similar to those provided to individuals on the basis of race, color, sex, national origin, age, and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, State and local government services, and telecommunications. Recently, Executive Order 13548 and the U.S. Department of Labor's Add Us In initiative have reiterated a commitment to helping people with disabilities succeed in the workforce. Current data from the CPS show that a very large portion of those with disabilities are not in the labor force, but additional data are needed to better understand the challenges facing this group. (See "Persons with a Disability: Labor Force Characteristics—2010," available on the Internet at: <http://www.bls.gov/news.release/pdf/disabl.pdf>.) In order to better understand the labor market challenges facing those with disabilities, ODEP asked BLS to design supplementary questions to be asked in May 2012. Such data are necessary to improve policies and programs designed to help those with a disability.

The overarching goal of the CPS Disability Supplement is to collect data that will increase our understanding of the labor market challenges facing persons with a disability. Such data are necessary to improve policies and programs designed to help those with a disability. Because the CPS is a labor force survey, the topics covered in the supplement mainly focus on work-related issues.

With this overall goal in mind, the Disability Supplement was designed to gather data in several specific areas related to the employment of persons with disabilities. What follows is a list of the subject areas for the proposed supplement and an explanation as to why the proposed data collection is important for policy development purposes.

A. Learn more about the low labor force participation rates for people with disabilities

Results will be used to target future policy development to important demographic audiences based on information relative to low labor force participation rates. For example, policy might need to be targeted to certain age, education, geographic, or other demographic characteristics.

B. Better understand the use and effectiveness of current programs designed to prepare people with disabilities for employment

The U.S. Department of Labor is interested in discerning the use and effectiveness of workforce development programs that prepare people with disabilities for employment. Results will be used to determine options for improving workforce development programs, such as enhancing the physical, programmatic, and communications accessibility of the workforce development system.

C. Learn more about the work history of people with disabilities

Current CPS data gives information on the work history of people with disabilities in the previous month. However, the CPS does not provide comprehensive data on an individual's work history. Results will be used for improving workforce development programs that address issues of work history for people with disabilities.

D. Identify the different types of barriers to employment people with disabilities experience

It is widely recognized that people with disabilities experience barriers to employment. However, the CPS does not provide details about specific employment barriers experienced by people with disabilities. Results will be used to inform future policy development and pilot demonstration programs to address barriers to employment faced by people with disabilities.

E. Determine the types of workplace accommodations that assist people with disabilities; such accommodations include assistive technologies, transportation assistance, flexible work schedules, and alternative work arrangements

With appropriate accommodations, many people with disabilities are able to enter or reenter the workforce. Results will be used for improving workforce

development programs by promoting a wide range of workplace accommodations and to inform future policy development and pilot demonstration programs to address barriers to employment faced by people with disabilities.

F. Measure the use of financial assistance programs among those with disabilities and whether these programs affect the likelihood of working

There are many financial assistance programs, such as SSI/SSDI, Medicare/Medicaid, TANF, and benefits counseling, that assist people with disabilities who are trying to enter or reenter the workforce. There is limited information about the effectiveness of these programs. Results will be used for improving workforce development programs by ensuring that these financial assistance programs are available to people with disabilities who access these centers.

3. Use of Information Technology

The Census Bureau conducts the CPS, which includes designing the sample, conducting the interviews, training and monitoring the interviewers, and maintaining a continuing quality control program. The Census Bureau uses methods designed to keep respondent burden as low as possible. These interviewing methods, which include the use of computer-assisted interviewing, were improved as part of a complete redesign of the CPS implemented in January 1994. The redesign was preceded by years of wide-ranging discussions, research, and large-scale field tests aimed at long-range improvements in the survey.

The CPS and all of its supplements, including the Disability Supplement, are collected 100 percent electronically by using Computer Assisted Telephone Interviews (CATI) and Computer Assisted Personal Interviews (CAPI). The data collection instrument is programmed in Blaise, a Windows-based survey processing system developed by Statistics Netherlands and licensed by Westat in the United States. The questions in the Disability Supplement were designed to obtain the required information with minimal respondent burden.

4. Efforts to Identify Duplication

The American Community Survey (ACS) is a very large survey conducted by the Census Bureau that includes a set of 6 questions that were designed to identify whether a respondent has a disability. The 6 ACS disability questions are very similar to those contained in the monthly CPS that are used to identify respondents who have a disability. Because the survey is very large, the ACS provides meaningful data by state and many local areas. However, the ACS provides minimal information about the labor force attachment of those who are neither employed nor unemployed, and the ACS does not collect information about accommodations or participation in assistance programs. Moreover, the ACS provides only limited information on the work activities of those with

disabilities; unlike the CPS, the ACS does not collect timely, detailed information on the employment status of the population.

The Survey of Income and Program Participation (SIPP) contains questions about the ability to perform a number of activities. If a person reports having a difficulty performing a specific activity, usually a follow-up question determines whether or not the difficulty is severe. Responses to these and related questions are used to arrive at a measure of disability status. The SIPP data are able to provide information about employment and recent work history; however, the SIPP provides little information about those who are not in the labor force, and does not ask about accommodations.

The National Health Interview Survey (NHIS) included the CPS and ACS disability questions in 2009, along with basic questions to establish whether respondents were employed or unemployed; however, this survey does not collect other more detailed data about labor force activities, and therefore cannot address the lack of data concerning the large contingent of those with a disability who are not in the labor force.

5. Minimizing Burden

The data are collected from households; their collection does not involve any small businesses or other small entities.

6. Consequences of Less Frequent Collection

The CPS Disability Supplement will collect new data concerning the labor market challenges facing persons with disabilities. It will also provide data that can be used by the Department of Labor's Office of Disability Employment Policy to help evaluate the effectiveness of their assistance efforts. This supplement will be the first collection effort designed to address these data needs.

7. Special Circumstances

There are no special circumstances. The CPS data are collected in a manner that is consistent with the guidelines in 5 CFR 1320.5.

8. Consultation Outside the Agency/Federal Register Notice

- a. No comments were received as a result of the Federal Register notice published in 76 FR 64975 on October 19, 2011.
- b. The following people have been in continuous consultation with BLS concerning the development of the survey:

Department of Labor

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Department of Labor
(202) 693-4923

Bureau of the Census

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Bureau of the Census
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In addition to the above, a statement soliciting comments for improving CPS data is prominently placed in all Census Bureau publications that cite CPS data. A similar statement is included in the technical documentation that accompanies the microdata files. Also the CPS advance letter (Attachment C) provides respondents with an address at the Census Bureau to which they can submit general comments on the survey, specifically those regarding respondent burden.

The process of developing the question set included an extensive outreach effort that involved multiple federal agencies, academic experts, and disability advocacy groups. Also, a white paper describing the supplement goals, the development process, and the draft questions was circulated to several federal agencies interested in disability data collection. Comments related to the white paper were addressed before the questions were placed into cognitive testing.

9. Paying Respondents

The Census Bureau does not make any payments or provide any gifts to individuals participating in the CPS.

10. Assurance of Confidentiality

The Census Bureau will collect the supplemental data in compliance with the Privacy Act of 1974 and OMB Circular A-130. Each sample household will receive an advance letter (Attachment C) approximately one week before the start of the initial CPS interview. The letter includes the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Field representatives must ask each respondent if he/she received the advance letter and, if not, must provide a copy of the letter to each respondent and allow sufficient time for him/her to

read the contents. Also, interviewers provide households with the pamphlet "How the Census Bureau Keeps Your Information Confidential," which further states the confidentiality assurances associated with this data collection effort (Attachment D). All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9 (Attachment E). Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or substantial fine if he/she discloses any information given to him/her.

11. Justification for Sensitive Questions

No sensitive questions are asked in this supplement.

12. Estimate of Respondent Burden

The estimated respondent burden for the May 2012 Disability Supplement is 8,833 hours. This is based on an average respondent burden of approximately 5 minutes for each of the approximately 106,000 individuals about whom data is collected in the supplement. About 63,000 respondents will supply the data for themselves and others in their households. These estimates are based on the number of respondents and responses in recent supplements. The actual respondent burden is dependent upon the size of the approximately 55,000 households that complete CPS interviews and the characteristics of their occupants.

The overall annualized dollar cost to the respondents for collection of the supplement data is \$110,417. This estimate assumes a wage rate for all respondents of \$12.50 an hour, the median hourly earnings for workers paid by the hour in 2010.

13. Estimate of Cost Burden

- a. Capital start-up costs: \$0
- b. Total operation and maintenance and purchase of services: \$0

There are no costs to survey respondents other than the time it takes to respond to the questionnaire. Respondents answer questions based on personal experience, which requires no record-keeping or other expenses.

14. Cost to the Federal Government

The total estimated cost of the May 2012 supplement is \$563,000. This cost is to be borne by the U.S. Department of Labor's Office of Disability Employment Policy and represents the charge by the Census Bureau (\$525,000) and the Bureau of Labor Statistics (\$38,000) for conducting the Disability Supplement. It includes programming the questionnaire, developing interviewer training materials, collecting data, processing survey microdata, developing public use files, and writing a news release.

15. Changes in Respondent Burden

The increase in burden hours results from the introduction of this new information collection.

16. Time Schedule for Information Collection and Publication

The May 2012 CPS, of which this supplement is a part, will be conducted during the week of May 6 – May 12, 2012. Processing of this supplement will begin in June 2012. The results of the survey will appear first as a press release in late 2012 or early 2013.

17. Request to Not Display Expiration Date

The Census Bureau does not wish to display the assigned expiration date of the information collection because the instrument is automated and the respondent, therefore, would never see the date. The advance letter sent to households by the Census Bureau contains Census's OMB clearance number for the CPS and Census's version of the failure to comply notice. (See Attachment C) Copies of this advance letter are stockpiled by the Census Bureau for use as needed; changes to the letter would make the current inventory of letters unusable.

18. Exceptions to the Certification

There are no exceptions to the certification.