

SUPPORTING STATEMENT B E-Verify Program Data Collections

B. Collections of Information Employing Statistical Methods

We are proposing to use statistical methods for sampling E-Verify employers, as described below. Based on previous studies, we do not expect the response rates to be adequate for making generalizations to the full population despite using aggressive follow-up techniques. We, therefore, expect to treat the data results as a case study.

1. Description of Respondent Universe and Sample Selection Procedures

Respondent Universe. The sample frame for the national onsite study survey will be based on data files from the Transaction Database provided by the contractor responsible for operating E-Verify. The eligible population will be *all* employers that had at least three workers who received tentative nonconfirmations (TNCs) within the three months prior to sample selection, approximately November 2012 through January 2013.

Sampling Methodology. A total of 698 employers met the criteria for sample selection (i.e., having at least three workers who received TNCs within the three months prior to sample selection, excluding E-Verify Employer Agents and their clients, and all employers that were sampled in the National User Survey conducted by Westat in April – June 2013). Although these 698 employers are not representative of all employers, they include all employers that recently handled three or more TNC cases – a population of special interest because of the complexity of these cases compared to cases that are immediately determined to be work authorized. Westat plans to target all 698 eligible employers for interviews with the goal of reaching 250 employers that agree to participate in the study.

We used a multistage sample design for selecting employers for site visits with counties and metropolitan areas being the primary sampling

units (PSUs). In the first stage, we selected 39 PSUs with probabilities proportional to the number of workers receiving TNCs in the PSU. By clustering employers in this way, we will reduce costs for site visit travel while maintaining geographical diversity among selected employers.

The second stage of sampling is the selection of workers who received TNCs in the 3 months prior to sample selection. Workers will be selected from those cases submitted by employers agreeing to participate in the study. If there are more than 25 such workers at any of our selected employers, we will take a random sample of 25 workers at that site. Otherwise, all such workers will be selected. The 698 eligible employers average about 5.3 workers per employer. Based on past experience, 250 completed employer interviews is expected to yield about 400 workers we can locate and who agree to participate in the study.

2. Information Collection Procedures

The employer and worker interviews will be conducted via a computer-assisted personal interviewing (CAPI) application administered by highly experienced and trained field interviewers. We do not expect to be able to generalize the results to the populations being studied due to low response rates among the high risk population of workers, many of whom are undocumented, and therefore difficult to locate.

3. Methods to Maximize Response Rates and Deal with Nonresponse

To minimize nonresponse, the USCIS contractor will devote considerable resources to developing and implementing approaches likely to achieve respondent cooperation with the study. The techniques that will be used are:

- Pretesting

New and revised items on the employer protocol will be pretested with up to nine employers through individual in-person interviews. In addition, lessons learned in the earlier data collections related to electronic employment verification will be incorporated into the E-Verify data collections to improve respondent cooperation.

- Motivational material
 - Information about the E-Verify data collection will be placed on the E-Verify web site to be accessed by employers that wish to obtain additional information about the evaluation. The web site will also include links to previous evaluations. Continued care will be taken in the final production of study materials to:
 1. Create a professional image for the study;
 2. Emphasize the importance of participation towards shaping future directions in Federal immigration policy;
 3. Emphasize the steps that will be taken to ensure respondent confidentiality; and
 4. Use language appropriate for the target population.
- Aggressive recruiting of employers

One of the major factors that increases study response rates is the use of aggressive recruiting procedures to gain cooperation with the study. The onsite study, therefore, includes multiple contacts with selected respondents. More specifically, the E-Verify-data collection procedures for employers consist of the following steps:

- A personalized pre-notice email letter will be sent by the contractor to all contact people identified in the E-Verify data files (Attachment D). A letter from DHS (Attachment H) will be attached to it and will state that this is part of the evaluation effort employers authorized when they signed the MOU. The letter will stress both the importance of participation to future employment

verification efforts and the fact that DHS will only use the information for research purposes.

- The letter will be followed by a telephone call from one of the contractor's recruiters. If after several calls, the recruiter cannot reach the person, he/she will leave a voice mail message with pertinent information and a toll-free call-back number.
- If there is no response to the telephone calls, the recruiter will try to make contact via email.
- If the e-mail bounces back, the recruiter will look up company information on the Internet to verify that the contact person still works at the company and to look for possible alternative contacts, such as the human resources (HR) director or other HR contact.
- If information about HR staff is not available on a company website, the recruiter will call the company's main number and asked to be transferred to the person who is knowledgeable about E-Verify or to ask for the HR department.

- Aggressive recruiting of workers

An incentive of \$35 will be offered to workers to complete the interviews. Based on Westat's previous data collection experiences with similar workers, we expect a large percentage of them to be undocumented immigrants, who may fear their identity and status will be disclosed. This could result in a reluctance to participate in the study, especially since co-workers may inform the sampled workers that Westat was asking about their work status and experiences in obtaining employment. Since the population is difficult to locate, once they are found, it is especially important to be able to offer them tangible encouragement to participate in the study. (In the 2010 Arizona study, the incentive was \$25 and the worker response rate was 18 percent.)

One of the most challenging aspects of achieving good response rates is to locate workers who are no longer employed at the sampled companies, especially given the elusive nature of this population of workers. Therefore, as part of the record review process, Westat will use the employer's records to locate the most recent contact information. Additionally, we learned from the conduct of the previous onsite studies that the contractor's experienced field interviewers and supervisors were resourceful in searching the Internet for contact information and making discreet inquiries of neighbors and friends about how to reach the workers.

- Training

All individuals who will be contacting potential respondents by phone, email, or in person will be trained in ways to optimize response. In addition to general study procedures, they also will be trained to respond to specific questions that are likely to be raised in this study.

Cooperation with the evaluation among employers participating in the E-Verify program is likely to be enhanced by their having signed an MOU with the DHS stating that they will respond to DHS and SSA

designees' inquiries about the program. Specifically, the MOU states the employer's responsibilities as follows:

"The Employer agrees to cooperate with DHS and SSA in their compliance monitoring and evaluation of E-Verify, including by permitting DHS and SSA, upon reasonable notice, to review Forms I-9 and other employment records and to interview it and its employees regarding the Employer's use of E-Verify, and to respond in a timely and accurate manner to DHS requests for information relating to their participation in E-Verify."

4. Test of Procedures or Methods to be Undertaken

The procedures for this data collection were pre-tested in the prior national onsite study in FY2008 and refined in an onsite study focused on Arizona in FY2010. Many of the protocol questions submitted in this request for clearance are the same as those used in the prior evaluations. Some changes have been made to accommodate the differences in programs and scope compared to the previous data collection activities. The employer and worker protocols were carefully reviewed by the contractor's Instrument Design, Evaluation, and Analysis (IDEA) group. New and revised employer questions were pretested with up to nine employers through in-person interviews in the Washington, D.C. area. The attached protocols (Attachments A and B) incorporate IDEA's input and the pretesting results.

5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

The following Westat statisticians were consulted on the statistical aspects of the design and analysis of the current study:

Carolyn Shettle

Westat
1600 Research Blvd.
Rockville, MD 20850
(301) 251- 4324
carolynshettle@westat.com

Huseyin Goksel
Westat
1600 Research Blvd.
Rockville, MD 20850
(301) 251- 4395
huseyingoksel@westat.com

The following individuals will collect or oversee the collection of and/or analyze data for the current study:

Joan Michie
Westat
1600 Research Blvd.
Rockville, MD 20850
(301) 294- 2014
joanmichie@westat.com

Denise Glover
Westat
1600 Research Blvd.
Rockville, MD 20850
(301) 251- 2269
deniseglover@westat.com

Ashley Simpkins
Westat
1600 Research Blvd.,
Rockville, MD 20850
(240) 453-2687
ashleysimpkins@westat.com

Maura Spiegelman
Westat
1600 Research Blvd.,
Rockville, MD 20850
(301) 315-5950
mauraspiegelman@westat.com