# Justification for Non-Substantive Change Request for OMB 1205-0498: Evaluation of the Reintegration of Ex-Offenders (RExO) Program

The U.S. Department of Labor's Employment and Training Administration (ETA) would like to combine the first and second participant follow-up surveys for some respondents in the Evaluation of the Reintegration of Ex-Offenders (RExO) Program. In addition, ETA is requesting that the incentive payment for those who complete the combined survey be \$60, rather than a possible \$80 [\$40 which the Office of Management and Budget (OMB) approved for each of the two rounds of surveys.]

## **Background:**

In June 2012, OMB approved the first and second follow-up survey data collection (OMB 1205-0498) for the RExO Evaluation. Social Policy Research (SPR) and its subcontractor began the first survey of study participants in June 2012, for participants enrolled into the study over a one-year period. Although field locating efforts and efforts to reach those who are re-incarcerated continue, response rates are well below 70 percent overall for the first survey.

The response rate has increased in recent months, much of which is due to gaining access to state prisons, to which a sizable percentage of participants have returned. To date, however, incarcerated participants have only been interviewed in seven of the 18 states in the study. As a result, a large number of participants who have been unavailable to contact could still be reached once approval is given by their states to interview those who are incarcerated. Further, a number of current non-respondents may be locatable, but be disinterested in completing two separate surveys in a short period of time. Given that current response rates for the first survey are still below the target of 80 percent, it is critical to engage every study participant reached in order to achieve as high a response rate as possible on the survey.

Therefore, SPR has proposed combining the first and second surveys for those participants who have not yet responded to the first survey. There will be some reduction in questions that now only need to be asked once, such as those confirming the identity of the respondent. Further, because the overall burden to respondents would be less than required to complete two separate surveys (45 minutes vs. 60), SPR has requested a modified incentive to those sample members, allowing them to receive \$60 to complete the combined survey, rather than \$80 for completing two separate surveys. The originally approved \$40 incentive would remain for those sample members who have already completed the first survey and are asked to complete the second survey.

## How The Combined Survey and Modified Incentive Offer Would Work:

The combined survey and modified incentive would be offered to sample members who have not responded to, or have not been available for, the first survey. Approximately 25 percent of the total sample would be eligible for the combined survey, given the current response rate and the number of remaining sample members who are either outright refusals or deceased.

Study sample members will be divided into two groups – those who have provided a completed response to the first survey (group 1) and those who have not (group 2). Those deceased or who have firmly refused will be removed from both groups. Those in group 1 (who already have completed the first survey) will be contacted at the appropriate time and offered the already-approved incentive (\$40) to complete the second survey. This is consistent with currently approved methods, and no change is sought for this group. Those in group 2, however, will, when contacted, be offered a \$60 incentive to complete a combined survey. Given the reduced burden to respondents overall, SPR feels a \$60 incentive is appropriate, which also will reduce the overall cost of incentives for the study.

## **Revised Estimate of Burden**

The estimated burden will be reduced under this approach because rather than completing two separate surveys, those who have not yet responded to the first survey would complete a single, combined survey. This is reflected in the tables below, which show the initial estimate of burden approved by OMB, and the revised estimate based on the proposed approach.

Information Collection	Total	Frequency	Average Time	Burden		
Activity	Respondents	r v	per Response	Hours		
Impact component						
First survey	3,728	Once	30 minutes	1,864		
Second survey	3,262	Once	30 minutes	1,631		
Administrative Records Collection						
	54	Once	120 minutes	108		
Total Responses	7,044			3,603		

INITIAL ESTIMATE OF BURDEN HOURS AND COSTS
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### REVISED ESTIMATE OF BURDEN HOURS AND COSTS

Information Collection	Total	Frequency	Average Time	Burden			
Activity	Respondents		per Response	Hours			
Impact component							
First survey	2,968	Once	30 minutes	1,484			
Second survey	2,374	Once	30 minutes	1,187			
Combined survey	760	Once	45 minutes	570			
Administrative Records Collection							
	54	Once	120 minutes	108			
Total (unduplicated)	6,156			3,349			