**Supporting Statement for the**

**Paperwork Reduction Act of 1995**

**Part A. Justification**

**Evaluation of Getting to Work: A Training Curriculum for HIV/AIDS Service Providers and Housing Providers**

U.S. Department of Labor

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**SUPPORTING STATEMENT**

**FOR THE PAPERWORK REDUCTION ACT OF 1995**

**INFORMATION COLLECTION REQUEST FOR THE**

**EVALUATION OF “GETTING TO WORK: A TRAINING CURRICULUM FOR HIV/AIDS SERVICE PROVIDERS AND HOUSING PROVIDERS”**

# PART A. JUSTIFICATION

The U.S. Department of Labor (DOL) is requesting clearance for an information collection to conduct: 1) a survey of managers and counselors who work for housing providers funded by the U.S. Department of Housing and Urban Development (HUD), and 2) focus groups with staff at HUD-funded housing providers. This data collection will be used to evaluate *Getting to Work: a Training Curriculum for HIV/AIDS Service Providers and Housing Providers* (Getting to Work or GTW). Getting to Work is a 3-module online training produced by DOL’s Office of Disability Employment Policy (ODEP) and HUD. IMPAQ International, LLC (IMPAQ) is conducting the evaluation of the training on behalf of DOL.

## 1. Circumstances Necessitating the Information Collection

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Due to advances in treatment, more and more persons living with HIV/AIDS (PLWHA) are living healthier lives, and many have the desire, capability, and stamina to contribute to the workforce. Research suggests that for many PLWHA, working, like stable housing, is positively associated with improved physical and mental health, and can serve as a preventative measure to the spread of HIV/AIDS.

HIV/AIDS service providers are recognizing that employment is a key component of serving the whole person. Some are integrating employment assistance, in a variety of forms, into their service menus. To provide such services effectively, it is important that providers understand HIV/AIDS in the context of employment. There are different approaches to helping clients who are ready to work identify and achieve their related goals. The goal of GTW is to increase the capacity of service providers to enhance opportunities for employment and retention of PLWHA and/or those at risk of living with HIV/AIDS.

In the fall of 2013, ODEP contracted with the IMPAQ team to conduct this study to address the following questions:

1. What knowledge did the training participants (individuals) report about HIV/AIDS and employment?
2. What new attitudes, behavior, or actions related to employing PLWHA did training participants (individuals) report?
3. What longer-term individual and organizational changes occurred related to HIV/AIDS and employment following participation in the training?

ODEP requests clearance to conduct, through the IMPAQ team, two principal research activities:

* Administration of a web-based survey of all Getting to Work trainees
* Conduct focus groups at a sample (N=8) of housing providers

This information collection is being conducted by the Office of Disability Employment Policy (ODEP), which was authorized by Congress in the Department of Labor's FY 2001 appropriation.

## 2. Purpose and Use of Information

Information collected in this study will be used to examine whether the reported attitudes and behaviors of housing providers who participated in GTW are related to outcomes for PLWHA.

The results of this evaluation will be used to inform programmatic decisions, as well as the ongoing collaboration between ODEP and HUD.

## 3. Use of Information Technology

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Electronic technology (e.g., web-based materials) will be used whenever possible to reduce the time burden on respondents. The GTW survey will be administered via a web-based instrument developed using an automated survey administration and data collection system (e.g., SnapSurvey). The software which will be used provides 128-bit Secure Sockets Layer encryption capabilities for ensuring private responses and for exporting responses for future analyses. The software also allows for the identification of responders and non-responders without compromising the privacy of responses. Per Section 508  [of the Rehabilitation Act](http://www.section508.gov/Section-508-Of-The-Rehabilitation-Act) (29 U.S.C. § 794 d), surveys will be designed to be accessible and to reduce burden for respondents with disabilities.

Web-based surveys are a proven, cost-effective data collection methodology. In addition to enabling respondents to complete the survey at a time of their choosing, this method will allow the project team to monitor the survey response rate in real time and send customized reminder e-mails.

## 4. Identification of Duplication of Information Collection Efforts

This research is an evaluation of a new training curriculum. No research on this training has been possible until now. However, to identify any possible overlapping efforts, researchers conducted a review to determine whether there were recent or current evaluations of other training programs geared toward housing providers, and/or of housing/employment provision for PLWHA. This review consisted of three steps: 1) consultation between ODEP and IMPAQ, 2) a search of key literature for recent research on a similar topic, and 3) a review of current research activity at organizations that fund housing and/or employment initiatives for PLWHA. The review literature and organizations that were reviewed are listed in Appendix A. IMPAQ found that no other researchers are conducting studies similar to this evaluation. While one research article described housing and additional supports for PLWHA,[[1]](#footnote-1) employment was not among the additional supports, and the intervention bears no resemblance to GTW. Another article evaluated the outcome of a training program for housing managers, but the topic of the training was trial-based functional analysis, and the training was delivered in-person using a turnkey model with 9 individuals.[[2]](#footnote-2) Thus, the subject of this research bore little resemblance to GTW. The agency is confident that the proposed information collection is in no way duplicative of current or prior efforts.

## 5. Impacts on Small Businesses or Other Small Entities

The instruments and procedures for conducting the surveys and focus groups have been designed to minimize the burden on all respondents and will not have a significant impact on small businesses or other small entities.

## 6. Consequences of Not Collecting the Data

Without the proposed survey and focus groups, there will not be any data on the effect of the Getting to Work training on the target individuals and organizations. Consequently, policymakers would not know whether and how to allocate additional resources to continuing this particular approach to fostering housing and employment connections among service providers who work with PLWHA.

## 7. Special Data Collection Circumstances

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This request is consistent with the general information collection guidelines of 5 CFR 1320.5(d) (2). In addition, the survey will include a pledge of privacy supported by authority established in statute or regulation and by disclosure and data security policies consistent with the pledge. No special data collection circumstances apply.

## 8. Federal Register Notice

Notification of this survey was published in the *Federal Register* on September on September 2, 2014 (79 FR 52043), a copy of which is provided in Appendix D. Readers were given 60 days from the date of publication to submit comments. No comments were received.

## 9. Payments/Gifts to Respondents

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Focus group respondents will be provided with a $30.00 gift card as an incentive for participation. Incentives are necessary (Kreuger, 1994; 2009), due to the unique contribution required of the participant.[[3]](#footnote-3) Unlike interviews or surveys in which participants typically respond to questions in their own locale (home or work) and according to their own schedule, focus groups usually ask that participants come to a separate location on a set schedule. Additionally, it has been the experience of the IMPAQ team that providing an incentive dramatically increases participation rates. While there is no formal research documenting this in focus groups (arguably because it is difficult to even assemble a focus group without incentives), a systematic review of studies that focused on the effect of incentives on survey research found that, on average, incentives *doubled* response rates[[4]](#footnote-4). Additionally, the experience of the IMPAQ team is that while incentives have increased data completion in past IMPAQ studies, incentives have not negatively affected data quality. For example, incentives do not seem to increase socially desirable responses. Davern, Rockwood, Sherrod & Campbell (2003)[[5]](#footnote-5) have established this ‘non effect’ empirically.

Participants in this study’s focus groups are unlikely to have an internal motivation to participate. For all of the reasons above, IMPAQ believes that a gift is critical to ensuring adequate participation. Therefore, IMPAQ is confident that the $30.00 gift will not influence the participants’ responses to focus group questions in any way. The total cost of the incentive will be $2,160.00. 72 Respondents x $30 = $2,160.

## 10. Assurance of Privacy

The surveyed provider management and staff will be assured that their responses will be kept private to the extent permitted by law. Survey data will be stored on the evaluation contractor’s server that is protected by a firewall that monitors and evaluates all attempted connections from the Internet.  Personal information (name, telephone number, and e-mail address) on each survey response will be maintained in a separate data file apart from the survey data so that individuals outside of the project team cannot link particular responses to individual respondents.  Once the contract is completed, any personally identifiable data on each survey respondent will be destroyed.  The entire survey database will be encrypted so that any data stored will be further protected.  Finally, access to any data with identifying information will be limited only to contractor staff directly working on the survey. Survey findings will be presented at a level of aggregation such that it will not be possible to link specific responses to individual respondents.

Focus group participants will be assured that their responses will be kept private to the extent permitted by law.  All findings in any published reports or briefings will be presented at the aggregate level, so that it is not possible to link comments to particular individuals.  Similarly, focus group notes or recordings will not be shared with ODEP staff or anyone else outside the study team, except under a circumstance compelled by law. Paper copies of focus group notes and audio recordings will be secured in a locked file cabinet. If any notes are recorded on laptop computers, such notes will be stored in a SQL Server database located in the contractor’s access-controlled server room.

## 11. Questions of a Sensitive Nature

There are no data of a sensitive, personal, or private nature being collected in the survey, or focus-group procedures.

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| --- |

**12. Estimate of Annualized Burden Hours and Costs**

Exhibit 1 shows the estimated annualized burden hours for the respondents to participate in this study. Each of the approximately 1,000 training participants[[6]](#footnote-6) will be asked to complete a web-based survey. While for budget purposes 100 percent participation is estimated, the agency actually expects an 80 percent response rate, or 800 respondents. This rate is based on the experience of the IMPAQ team while conducting the Growing America Through Entrepreneurship (GATE) research project for the Employment and Training Administration, U.S. Department of Labor. This survey received a response rate of 82 percent. Additionally, efforts have been planned to achieve an 80 percent response rate by sending an advance notice via e-mail as well as two follow-up reminders using the same channel. The survey will take approximately 30 minutes to complete, including the time for reading our introductory letter, reminder e-mails, etc. Focus groups will each last 90 minutes (including completion of consent and participant information form). The total burden hours are estimated at 608.

**Exhibit 1: Estimated Annualized Burden Hours**

| **Data Collection Activity** | **Number of Respondents** | **Frequency of Response** | **Average Time per Respondent** | **Burden Hours** |
| --- | --- | --- | --- | --- |
| **Web Survey (Assuming 80% Response Rate)** | | | | |
| HUD grantee managers and staff | 1000 | Once | 30 minutes | 500 |
| **Subtotal Survey** | **1000** |  |  | **500** |
| **Focus Groups (Conducted at up to 8 HOPWA organizations)** | | | | |
| HUD grantee managers and staff | 72  (9 individuals x 8 focus groups) | Once | 90 minutes | 108 |
| **Subtotal Focus Groups** | **72** |  |  | **108** |
| **TOTAL** | **1072** | **n/a** | **n/a** | **608** |

Exhibit 2 shows the annualized cost to respondents for the hour burdens for data collection. Average hourly wage rates and associated costs are based on Bureau of Labor Statistics data (United States Department of Labor, Bureau of Labor Statistics, March 2013 “Table 2, Civilian Workers, by occupational and industry group,” available at <http://www.bls.gov/news.release/archives/ecec_06122013.pdf>). Specifically, for HUD grantee managers, the rate for “Management/Professional, and Related” ($48.20) was used. For HUD grantee employees, the rate for “Education and Health Services/Health Care and Social Assistance” ($30.00) was used. These rates represent salaries plus fringe benefits and do not include the cost of overhead. An overhead rate of 110 percent is used to account for these costs. The full-burdened hourly wage rates used to represent respondent labor costs are: **$53.02 for managers** ($48.20\*1.1), and **$33.00 for staff** ($30.00\*1.1). The total annualized cost is estimated at $25,549.

**Exhibit 2: Estimated Annualized Cost**

| **Data Collection Activity** | **Burden Hours** | **Average Hourly**  **Wage Rate** | **Burden Hours Monetized** |
| --- | --- | --- | --- |
| **Web-based Survey** | | | |
| HUD grantee / manager | 250 | $53.02 | $13,255 |
| HUD grantee / staff | 250 | $33.00 | $8,250 |
| **Subtotal Survey** | | | **$21,505** |
| **Focus Groups** | | | |
| HUD grantee / manager (2/focus group; 16 total) | 24  (16 x 1.5 hours) | $53.02 | $1,272 |
| HUD grantee / staff (7/focus group; 56 total) | 84  (56 x 1.5 hours) | $33.00 | $2,772 |
| **Subtotal Focus Groups** | | | **$4,044** |
| **TOTAL** | **608** | **n/a** | **$25,549** |
|  | | | |

## 13. Estimates of Annualized Respondent Capital and Maintenance Costs

There are no direct costs to respondents other than that of their time of participation. There will be no start-up or ongoing financial costs incurred by respondents. There are no record keepers.

## 14. Estimates of Annualized Cost to the Government

Exhibit 3 shows the cost to the Federal government for carrying out this information collection effort is approximately $90,604 which is the cost associated with the data collection activities for the project, and contract administration.

Exhibit 3: Annualized Cost to the Government

| **Cost Type** | **Cost of the**  **Hour Burden** |
| --- | --- |
| **Web-based Survey** | |
| Instrument Design | $13,000.00 |
| Instrument Testing | $3,000.00 |
| Implementation | $26,000.00 |
| **Subtotal Survey** | **$42,000.00** |
| **Focus Groups** | |
| Discussion Guide Design | $10,000.00 |
| Discussion Guide Testing | $2,000.00 |
| Implementation | $24,000.00 |
| **Subtotal Focus Groups** | **$36,000.00** |
| **Contract Administration** | |
| Contract Administration | $12,604 |
| **Subtotal Contract Administration** | **$12,604** |
| **TOTAL** | **$90,604** |
|  | |

## 15. Changes in Hour Burden

This is a new, one time data collection effort counting as 608 hours towards DOL’s Data Collection Burden.

## 16. Plans for Tabulation and Publication

Tabulations and analyses will be published in a final report to be delivered to DOL-ODEP for likely publication in the summer of 2015. The final report will include analysis of survey and focus group data.

**16.1 Tabulation**

This section describes the tabulations in the study, which will be used to examine each of the research questions identified in Section A.1. The study will use tables to report the overall outcomes of the training –changes in the actions or behaviors of the training recipients.

***Step One***. IMPAQ will conduct an initial technical analysis to understand how respondents are interacting within the system in the basic completion of the survey. This analysis will provide frequencies on the percentage of respondents completing all questions, as well as completion frequencies for each question. This will help us understand the extent of missing data, if any, and what implications missing data may have on our analysis decisions.

***Step Two***. IMPAQ will document the existing demographic variables of users who complete the training and generate a demographic profile. Variables include age, gender, race/ethnicity, type of provider/agency that respondents represent, whether direct service or executive/administrative staff, length of service, etc. IMPAQ will present a demographic profile using descriptive statistics in tabular form.

***Step Three***. IMPAQ will conduct an analysis of the responses to descriptive items and Likert scale-type items. The comparison will be between respondent groups. For example, researchers will compare responses of individuals with fewer than 5 years’ experience with those of individuals with 6 or more years’ experience. Assuming sample sizes are large enough, differences between the groups will be tested for significance to determine whether the training accounts for these differences, or whether they are due to chance alone. Statistical methods for conducting this analysis include Chi-square and simple linear regression. These are further described below.

Group analyses may be conducted by looking for patterns. For example: Which questions did most respondents answer positively (correctly)? Which questions are most often answered? Are respondents noting positive change in some areas more than others? In addition, assuming sample sizes are large enough, demographics can be used as independent variables to compare outcomes by different types of respondents to determine whether some respondent types tend to do better than others. Again, if sample sizes permit, regression analysis also may be used to predict which types of respondents are likely to report the most positive change. These analyses may promote quality improvement, helping ODEP to improve future training, including identifying areas where targeted training may be needed.

*Chi-square Test for Independence*.IMPAQ may use the standard chi-square test for independence to determine if there are any notable differences in the frequency of responses across respondent groups. The test, which may be used for those questions that are categorical in nature (e.g. Likert scale-type items; pre-defined response options), will be estimated using the following equation:

where is the observed frequency of responses for response option of the survey question and respondent group , and is the expected frequency of responses for response option of the survey question and respondent group . For example, when testing if respondents’ opinions about emphasizing PLWHA employment and training opportunities vary by respondents’ level of experience, options of the survey question would simply be the various levels of importance offered in the question’s response options, and respondent groups would be the levels of respondents’ experience (e.g. those with 5 or less years of experience and those with 6 or more years of experience).

*Simple Linear Regression.*IMPAQ may use linear regression to predict which groups of respondents are likely to give positive survey responses. The covariates included in the regressions would be those that are likely to influence or explain respondents’ answers to the survey question of interest. For example, to model the type of respondents that report encouraging organization staff to talk more about employment/training opportunities, the regression might include the following explanatory variables: respondent organization type, respondent experience, and a set of demographic characteristics (race, gender, age). This model would take the form:

where is the outcome of interest, is the intercept (or effect size of the omitted first organization type); is the coefficient or effect size for the second organization type; is the coefficient for the second organization type; is the coefficient for the level of respondent experience; is a matrix of coefficients for a set of demographic variables; is a set of demographic variables; and is a normally distributed error term.

***Step Four***. Researchers will use standard content analysis to analyze open-ended questions, distilling common themes and identifying areas where variance or disagreement might exist. IMPAQ will use NVivo to manage and assist in the analysis of both qualitative survey data and focus group data.

## 17. Approval to Not Display the Expiration Date

The OMB approval number and expiration date will be displayed or cited on all information collection instruments.

## 18. Exceptions to the Certification Statement

No exceptions are sought to the certification statement.

1. Kielhofner, G., Braveman, B., Fogg, L. & Levin, M. (2008) A controlled study of services to enhance productive participation among people living with HIV/AIDS. *American Journal of Occupational Therapy 61,* 36-45. [↑](#footnote-ref-1)
2. Lambert, J., Bloom, S., & Kunnavatana, S. (2013). Training residential staff to conduct trial-based functional analysis. *Journal of Applied Behavior Analysis 46,* 296-300. [↑](#footnote-ref-2)
3. Kreuger, R. (1994). *Focus Groups: A practical guide for applied research, 2nd Ed*., Thousand Oaks, CA: Sage Publications. [↑](#footnote-ref-3)
4. Edwards, P., Roberts, I., Clarke, M., DiGuiseppi, C., Pratap, S., Reinhard, W., & Kwan, I. (2002). Increasing Response Rates to Postal Questionnaires: Systematic Review. *BMJ 324*. [↑](#footnote-ref-4)
5. Davern, M., Rockwood, T.H., Sherrod, R., & Campbell, S. (2003). Prepaid Monetary Incentives and Data Quality in Face-to-Face Interviews: Data from the 1996 survey of income and program participation incentive experiment. *Public Opinion Quarterly, 67* pp. 139-147. [↑](#footnote-ref-5)
6. The Department of Housing and Urban Development’s Housing Opportunities for Persons with AIDS (HOPWA) Program will require its 137 formula grantees and 780 project sponsors to take the curriculum, and 137 competitive grantees and 141 project sponsors will have the option of taking the training as well. This will amount to a minimum of 1,000 users. [↑](#footnote-ref-6)