

Supporting Statement for the Paperwork Reduction Act of 1995

Part A. Justification

Evaluating the Accessibility of American Job Centers for People with Disabilities

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SUPPORTING STATEMENT FOR THE PAPERWORK REDUCTION ACT OF 1995

INFORMATION COLLECTION REQUEST FOR THE EVALUATION OF THE ACCESSIBILITY OF AMERICAN JOB CENTERS FOR PEOPLE WITH DISABILITIES

PART A. JUSTIFICATION

The U.S. Department of Labor (DOL) is requesting clearance for an information collection to conduct: 1) a survey of directors at American Job Centers (AJCs), 2) in-depth interviews with AJC staff, and 3) focus groups with AJC customers, for a study of AJC accessibility to people with disabilities. As requested by Congress, this study seeks to determine a national estimate of the level of physical, programmatic, and communication accessibility of AJCs to persons with disabilities (PWD). This is not an audit of compliance with laws and regulations regarding accessibility of AJCs. Rather, the purpose of the study is to gather data to paint a broad picture about the degree to which AJCs as a whole are accessible to people with disabilities. IMPAQ International, LLC and its subcontractors, the Burton Blatt Institute and Evan Terry Associates (henceforth the IMPAQ team), are conducting the study on behalf of DOL.

1. Circumstances Necessitating the Information Collection

The Bureau of Labor Statistics reports that the labor force participation rate for persons with disabilities (PWD) was 20.3 percent as compared to 63.2 percent for the total civilian labor force, in 2013.¹ In addition to dramatically lower participation rates, PWDs also experienced substantially higher unemployment rates. People with disabilities had an average monthly unemployment rate of 13.2 percent in 2013, compared to 7.4 percent for the total civilian labor force.

AJCs, formerly called One-Stop Career Centers, were established under the Workforce Investment Act (WIA), to offer training referrals, career counseling, job listings, and similar employment-related services to help Americans find work and enhance their long-term economic security. Today, there are 1,723 comprehensive and 819 affiliate AJCs.² By law, the AJC system must ensure that its programs, services, and facilities provide programmatic, communication and physical accessibility to all qualified persons with disabilities (PWD) under

¹ <http://www.bls.gov/news.release/disabl.t01.htm>

² American Job Centers (AJCs) provide a full array of employment and training related services for workers, youth, and businesses. These locations include the mandatory WIA partners onsite. Affiliate AJCs provide limited employment and training related services for workers, youth, and businesses. These locations do not include all the mandatory WIA partners (i.e., Veterans, Vocational Rehabilitation) onsite.

Section 504 and Titles II and III of the Americans with Disabilities Act (ADA).³ The level of accessibility of the AJC system for PWDs may be a factor in the employability of the 27 million Americans over 16 years old with disabilities. Therefore, it is important for policymakers to understand the level of accessibility and to identify ways to improve the accessibility of the AJC system for PWDs. Current research indicates that accessibility barriers continue to be a challenge in the AJC system, and that AJCs require additional support and capacity building to respond to this situation⁴. Most research on AJC accessibility to PWD has involved case studies or limited surveys focused on specific issues. To date, there has been no documented research which provides a national estimate of the level of AJC accessibility to PWD.

In the fall of 2012, OASAM contracted with the IMPAQ team to conduct this study to address the following broad questions:

- To what degree do AJCs provide accessible services to PWD?
- How does this accessibility vary by the type of accessibility required, such as physical, programmatic, and communication?
- How does accessibility vary by the characteristics of AJCs (e.g., affiliate vs. comprehensive, or rural vs. urban) or the nature of AJC services provided (e.g., core, intensive, and training)?

OASAM requests clearance for the IMPAQ team to conduct three principal research activities:

- Administration of a Web-based survey of all AJC directors
- Conduct of in-depth interviews during 100 site visits to AJCs, including interviews with center management and staff
- Conduct of customer (PWD) focus groups at a sample (N=10) of the AJC sites to be visited as part of the study.

This information collection is authorized under Section 172 of the Workforce Investment Act of 1998. Please see Attachment A.

2. Purpose and Use of Information

The IMPAQ team will use the information collected in this study to conduct an analysis and develop an understanding of the level of AJC accessibility to PWD at the national level. More specifically, the study will examine accessibility at the following three levels:

³ Blanck, P., Hill, E., Siegel, C.D., & Waterstone, M. (2009). Disability civil rights law and policy: Cases and materials. St. Paul, MN: West.

⁴ See, for example, Ellinson, L., Frey, W.D., Li, T., Palan, M.A., and Horne, R. L. (2008). Evaluation of customized employment in building the capacity of the workforce development system. *Journal of Vocational Rehabilitation*, 28, 141-158.

Physical Accessibility. Involves creating access to the center's premises for all individuals, including those with physical disabilities. To create physical accessibility, AJCs must identify and remove physical barriers that may prevent persons with disabilities from entry into buildings, rooms, or physical spaces, or from equal access to facilities or amenities within the center.

Communications Accessibility. Includes the different ways in which AJC staff and customers interact and exchange information, including conducting outreach, providing access to resources, and delivering education and training. To create communications accessibility, AJCs must ensure that written materials, websites, videos and other types of materials are accessible to all individuals and that interactions with staff accommodate the communication needs of all individuals, including those with speech, hearing, and cognitive disabilities.

Programmatic Accessibility. Involves creating access to AJC programs and services by recognizing and accommodating the needs of individuals with disabilities. Individuals with different disabilities and personal circumstances may require different strategies and supports to achieve the same goals of equal opportunity and equal enjoyment of the services offered by AJCs. To create programmatic accessibility, AJCs must design their programs, services, policies, and practices so that they accommodate individuals with disabilities, and train their staff to understand and respond to the needs of a broad diversity of individuals with disabilities. AJCs can offer a range of services including job search resources and assistance, comprehensive assessment, as well as a variety of workshops and training programs. To create programmatic accessibility, AJCs must design all of their services and train their staff so that they can understand and anticipate the needs of a broad diversity of individuals with disabilities⁵.

In addition, to the extent possible, the study will examine differences between specific subgroups of interest, such as comprehensive vs. affiliate AJCs, geographic location of AJCs (i.e., rural vs. urban), and the nature of the AJC services provided (i.e., core, intensive, and training services).

DOL/OASAM will be able to use the study findings to determine areas for improvement and to strategize how best to facilitate that improvement.

3. Use of Information Technology

Electronic technology (e.g., Web-based materials) will be used whenever possible to reduce the time burden on respondents. The AJC 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 (29 U.S.C. §

⁵ Hoff, D. (2001). Access for all: A resource manual for meeting the needs of one-stop customers with disabilities. Boston, MA: Institute for Community Inclusion.

794 d), surveys will be designed to be accessible, 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

To identify any possible duplication of efforts, researchers consulted with various offices within the DOL that interact with AJCs, including the Civil Rights Center (CRC), the Office of Disability Employment Policy (ODEP) and the Employment and Training Administration (ETA). It was found that no other offices are conducting research that is similar to the primary purposes of this study. For example, while the DOL Civil Rights Center (CRC) is charged with ensuring compliance with WIA Section 188, its staff cannot visit every AJC to assess accessibility to PWD. And, when the CRC does conduct site visits, their visits are focused on assessing the level of *compliance* at the individual site, rather than on obtaining a national estimate of the level of AJC accessibility to PWD.

A literature review of AJC accessibility studies confirmed that most of the existing research has involved case studies or limited surveys focused on specific issues related to the issue of accessibility. No comprehensive survey has been performed which has examined all aspects of AJC accessibility at the national level. While the existing literature provides a strong evidence-base which documents accessibility challenges (and suggestions for how best to measure and assess accessibility), it cannot serve as the basis for the development of national estimates of the level of accessibility of AJCs to PWD.

The proposed study is therefore necessary to complement the smaller studies that have taken place to date and to document the degree to which accessibility challenges identified at local levels do or do not persist across the entire publicly-funded workforce system. For these reasons the proposed information collection is in no way duplicative of prior efforts.

5. Impacts on Small Businesses or Other Small Entities

The instruments and procedures for conducting the interviews, focus groups, and surveys, 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 site visits, there would not be adequate information to understand the level of accessibility of AJCs to PWDs at a national level. Consequently, policymakers would not know what the current level of accessibility is and the steps that could be taken to improve AJC accessibility as a way of improving employment outcomes among PWD.

7. Special Data Collection Circumstances

This request is consistent with the general information collection guidelines of 5 CFR 1320.5(d) (2). The Web-survey will produce valid and reliable results that can be generalized to the referenced universe of study. 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 circumstances apply.

8. Federal Register Notice

In addition to eliciting feedback from DOL's CRC, ODEP, and ETA, researchers have assembled two technical working groups (TWG) one with substantial knowledge of disability issues and employment data and another with technical expertise in the study methodology. DOL staff from the agencies listed, as well as TWG members, provided informed views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, and reported.

Notification of this survey was published in the Federal Register, Vol. 78, No. 172, on Thursday, September 5, 2013: pp. 54679-54680, a copy of which is provided in Attachment B. Readers were given 60 days from the date of publication to submit comments. No comments were received.

9. Payments/Gifts to Respondents

Focus group respondents will be provided with a \$40.00 gift card as an incentive for participation. Total cost for the incentives is \$3,600 (90 focus group participants x \$40 = \$3,600). Incentives are necessary (Kreuger, 1994; 2009), due to the unique contribution required of the participant.⁶ 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 our experience 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

⁶ Kreuger, R. (1994). *Focus Groups: A practical guide for applied research, 2nd Ed.*, Thousand Oaks, CA: Sage Publications.

average, incentives *doubled* response rates⁷. Participants in this study's focus groups are unlikely to have an internal motivation to participate due to the potential challenges associated with attendance. For all of the reasons above, we believe that a gift is critical to ensuring adequate participation. Our experience is in accordance with findings from Davern, Rockwood, Sherrod & Campbell (2003)⁸ that showed no correlation between incentives/gifts and data quality (either positive or negative). Therefore, we believe that the \$40.00 gift will not influence the participants' responses to focus group questions in any way.

10. Assurance of Privacy

The surveyed AJC directors 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, all sensitive 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.

The AJC managers, staff members, partners, and other stakeholders interviewed by research team members, as well as customer 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, interview notes or recordings will not be shared with OASAM staff or anyone else outside the study team. Paper copies of interview 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, interview, or focus-group procedures.

12. Estimate of Annualized Burden Hours and Costs

⁷ Edwards, P., Roberts, I., Clarke, M., DiGuseppi, C., Prata, S., Reinhard, W., & Kwan, I. (2002). Increasing Response Rates to Postal Questionnaires: Systematic Review. *BMJ* 324.

⁸ 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.

Exhibit 1 shows the estimated annualized burden hours for the respondents to participate in this study. Each of the 2,542 AJC directors will be asked to complete a Web-based survey. We expect an 80 percent response rate, or 2,034 respondents. This rate is based on our experience 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%. Additionally, extensive efforts have been planned to achieve an 80 percent response rate by sending multiple advance notices via mail and e-mail, as well as extensive follow-up efforts using the same channels. The survey will take approximately 40 minutes to complete, including the time for reading our introductory letter, reminder e-mails, etc. Interviews with AJC staff and directors will last about 75 minutes. The customer focus groups will each last 90 minutes (including completion of consent and participant information form). The total burden hours are estimated at 1,991.

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)				
AJC Director	2,034	Once	40 minutes	1,356
Subtotal Survey	2,034			1,356
Interviews (Conducted while on Site Visits to 100 American Job Centers)				
AJC Director	100 (1 per AJC)	Once	75 minutes	125
AJC Manager (Present in approx. 50% of Centers)	50 (0.5 per AJC)	Once	75 minutes	62.5
AJC Disability Specialist (present in approx. 50% of Centers)	50 (0.5 per AJC)	Once	75 minutes	62.5
AJC Resource Room Staff Member	100 (1 per AJC)	Once	75 minutes	125
AJC Case Manager	100 (1 per AJC)	Once	75 minutes	125
Subtotal Interviews	400			500
Focus Groups with PWD (Conducted at 10 AJCs as Part of Site Visits)				
People with Disabilities (PWD)	90 (9 per group/ AJC)	Once	90 minutes	135
Subtotal Focus Groups	90			135
TOTAL	2,424¹	n/a	n/a	1,991

1. Approximately 100 AJC Directors will participate in both the web survey and the interviews being conducted as part of the site visits. These 100 AJC Directors are only counted once in the count of the total number of respondents.

Exhibit 2a shows the estimated hourly costs for selected workers for this data collection. Labor rates and associated costs are based on Bureau of Labor Statistics data published in a document titled “Employer Costs for Employee Compensation Historical Listing March 2004 – June 2014” and available at the following link: <http://www.bls.gov/ncs/ect/sp/ececqrtn.pdf>. The labor categories used were “Management, professional, and related”, “Professional and related”, and “Sales and office”. We have used the wages for the occupational groups listed above as the basis for the labor rates for AJC directors, AJC managers, and AJC staff (including disability

specialists, case managers, and resource room staff) respectively. 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 (and base rates) used to represent respondent labor costs are: \$107.65 (\$51.26) for AJC directors, \$101.22 (\$48.20) for AJC managers, \$49.08 for AJC staff (\$23.37), and \$24.02 (\$11.44) for focus group participants. The total annualized cost is estimated at \$184,336.

Exhibit 2a: Estimated hourly Costs for Selected Workers

Staff Member	Cost per hour source from <i>Employer Costs for Employee Compensation, Historical Listing, March 2004 - June 2014</i>	Cost per hour (base)	Cost per hour x 2.1 (assumes overhead rate of 110%)
AJC Director	Page 8, Table 1, Management, professional and related occupations	\$51.26	\$107.65
AJC Manager	Page 45, Table 3, Professional and related occupations	\$48.20	\$101.22
AJC Disability Specialist	Page 13, Table 1, Sales and office occupations	\$23.37	\$49.08
AJC Resource Room Staff Member	Page 13, Table 1, Sales and office occupations	\$23.37	\$49.08
AJC Case Manager	Page 13, Table 1, Sales and office occupations	\$23.37	\$49.08
People with Disabilities	Page 523, Table 30, Service occupations	\$11.44	\$24.02

Exhibit 2b shows the annualized cost to respondents for the hour burdens for data collection. The estimates of annualized cost are based on the burden hours presented in Exhibit 1, and the estimates of the labor rates and associated costs presented in Exhibit 2a.

Exhibit 2b: Estimated Annualized Cost

Data Collection Activity	Burden Hours	Average Hourly Wage Rate	Cost of the Hour Burden
Web-based Survey			
AJC Director	1,356	\$107.65	\$145,973.00
Subtotal Survey			\$145,973.00
Interviews			
AJC Director	125	\$107.65	\$13,456.00
AJC Manager	62.5	\$ 101.22	\$6,326.00
AJC Disability Specialist	62.5	\$ 49.08	\$3,068.00
AJC Resource Room Staff Member	125	\$ 49.08	\$6,135.00
AJC Case Manager	125	\$ 49.08	\$6,135.00
Subtotal Interviews			\$35,120.00
Focus Groups			
People with Disabilities (PWD)	135	\$24.02	\$3,243.00
Subtotal Focus Groups			\$3,243.00
TOTAL	1,991	n/a	\$184,336.00

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 direct cost to the Federal government, associated with the data collection activities for the project. The estimated cost for carrying out this information collection effort is approximately \$674,900..

Exhibit 3: Annualized Cost to the Government

Data Collection Activity	Cost of the Hour Burden
Web-based Survey	
Instrument Design	\$90,000.00
Instrument Testing	\$20,000.00
Implementation	\$90,400.00
Subtotal Survey	\$200,400.00
Interviews	
Instrument Design	\$35,000.00
Instrument Testing	\$20,000.00
Implementation	\$370,200.00
Subtotal Interviews	425,200.00
Focus Groups	
Discussion Guide Design	\$10,000.00
Discussion Guide Testing	\$20,000.00
Implementation	\$19,300.00
Subtotal Focus Groups	\$49,300.00
TOTAL	\$674,900.00

In addition to the direct annualized costs associated with creating and implementing the collections, interviews and focus groups, there are annualized costs associated with Federal contract administration. A reasonable estimate of the Federal burden for contract administration is 10% of the annual time budget for a Contracting Officer’s Representative at a GS 14 step 4 level. A typical Federal employee year is budgeted at 2080 hours. Taking 10% of this typical year would yield a time budget of 208 hours. This contract will be managed from the DOL National office in Washington, DC, so the appropriate hourly burden cost is being drawn from the [2014 OPM pay tables](#) (the 2015 tables are not currently available) which is \$56.01 for the basic rate. As a result, the cost for Federal contract administration is estimated at 208 hours x \$56.01 per hour = \$11,650.08. The total estimated annualized cost to the federal Government as a result of this collection is:

\$674,900.00	Annualized Estimate of Costs from Data collection activities
\$11,650.08	Annualized Estimate of Costs from Federal contract administration
\$686,550.08	Total Annualized Estimate of Federal Costs

15. Changes in Hour Burden

This is a new, one time data collection effort counting as 1,991 hours towards DOL's Data Collection Burden.

16. Plans for Tabulation and Publication

This project began in September 2012 and will end in August 2017. The project design and data collection instruments were prepared in 2013. Cognitive tests for instrument comprehension and length were conducted and adjustments were made prior to OMB review. Pending OMB clearance for data collection activities, the surveys will then be conducted between October and November 2014, inclusive.

Upon receipt of OMB clearance and approval for data collection activities, the project team will begin scheduling the site visits and conducting site visit training. We anticipate that the site visits will take place between December 2014 and April 2015, inclusive.

Tabulations and analyses will be published in a final report to be delivered to DOL/OASAM at the end of the project. The final report will include analysis of survey, site visit and focus group data.

16.1 Tabulation

This section describes the tabulations in the study, which will be used to examine each of the main topics identified in Section A.1. The study will use tables to report the overall level of accessibility of AJCs and the three types of accessibility – physical, communications, and programmatic. The tables will also report overall accessibility and the three types of accessibility for different subgroups of AJCs – affiliate vs. comprehensive, rural and urban, and the nature of AJC services provided. The accessibility scores will be developed from an analytic framework, Item Response Theory (IRT), which will produce a common metric (an accessibility score) from the survey questions and site visit data. The IRT Model, which is more fully described in Attachment C and Part B, will take into account two possible sources of bias – survey nonresponse and social desirability response. To make the accessibility scores more meaningful, they will be grouped into performance levels that can be more easily used and understood by the public, policymakers, and the AJCs themselves. Because the cut points for the accessibility levels are somewhat subjective (an example of a cut point would be the score that divides high and medium-high accessibility), the cut points will be established using a standard setting panel that will be independent from the evaluation contractor. Standard Setting Panels have been widely used in settings for which Item Response Theory has been applied, such as state education assessments.

To create a measure of AJC accessibility to PWD, we will establish measurement properties using IRT-based approaches. IRT models will provide a defined and common metric for both the latent construct (i.e., accessibility) and survey questions (i.e., survey item difficulty). The Partial Credit Model, a family of IRT models, will be used to estimate the accessibility levels for all AJCs and item parameters for all survey response categories.

The IMPAQ team will use an extension of the Partial Credit Model, the Facet Model, to measure the rates of Socially Desirable Response (SDR) and Survey Non-Response (SNR). Facet models will provide the parameter estimates for all SDR and SNR levels and the resulting construct estimates will be adjusted accordingly. Accessibility Level Descriptors and Standards will be set using a Standard Setting Panel that will include Technical Working Group (TWG) members and other Subject Matter Experts (SMEs) to be determined by DOL/OASAM. Finally, the Panel will develop an Overall Accessibility Rating, which will be a rule-based approach to producing a single rating representative of physical, communications, and programmatic accessibility ratings. Attachment C provides additional detail on the analytic approaches described above.

In-person, in-depth interviews, conducted during visits, will yield information that is largely qualitative in nature, and analyses will extract major themes and identify patterns in the data.

16.2 Publication

We anticipate publication of the Final Report in Summer, 2016.

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

There are no exceptions taken to item 19 of OMB Form 83-1.