

SUPPORTING STATEMENT
STATE APPRENTICESHIP EXPANSION (SAE) GRANT RESEARCH STUDY
OMB Control Number 1205-0NEW
PRA Supporting Statement Part A

A. Justification.

The U.S. Department of Labor's (DOL's), Employment and Training Administration (ETA) has commissioned an implementation evaluation of its efforts to expand registered apprenticeships. Through State Apprenticeship Expansion grants and National Industry Intermediary and Equity Partner contracts, DOL is seeking to expand apprenticeship programs to new industries and occupations, increase the number of apprentices, and encourage the inclusion of apprentices from diverse backgrounds.

This study, led by Mathematica Policy Research (Mathematica) and its partners, the Urban Institute and Social Policy Research Associates, will thoroughly document states' expansion of registered apprenticeships and the implementation of these grants and contracts through an assessment of their operations and strategies. This package requests clearance for the following four data collection instruments as part of this new collection:

1. State survey
2. State grantee telephone interview protocol
3. National industry intermediary telephone interview protocol
4. National equity partner telephone interview protocol

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

Even though the U.S. economy has been growing in recent years, many Americans struggle to find well-paid jobs. Employers also struggle to find workers with the right skills to fill job openings. The apprenticeship model is a promising solution to address both challenges.^{1,2,3,4} Apprenticeship is a career-training program that offers structured on-the-

¹ Helper, Susan, Ryan Noonan, Jessica Nicolson, and David Langdon. The Benefits and Costs of Apprenticeship: A Business Perspective. November 2016. Washington, DC: U.S. Department of Commerce.

² Lerman, Robert I. "Reinvigorate Apprenticeships in America to Expand Good Jobs and Reduce Inequality." Challenge vol. 59, no. 5, 2016, pp. 372-389.

³ Lerman, Robert. "Building hope, skills and careers: Making a US youth apprenticeship system." Social Policies for Children, 1996, pp. 136-172.

⁴ Reed, Debbie, Albert Yung-Hsu Liu, Rebecca Kleinman, Annalisa Mastri, Davin Reed, Samina Sattar, and Jessica Ziegler. An Effectiveness Assessment and Cost-Benefit Analysis of Registered Apprenticeships in 10 States, July 25, 2012. Oakland, CA: Mathematica Policy Research.

job training combined with related technical instruction tailored to industry needs. It is also an employer-driven training model that can benefit both employers and workers.

Since 2016, DOL has allocated more than \$90 million to promote apprenticeships as a key approach in the workforce development system. Building on an earlier round of small state “accelerator” grants, DOL awarded \$50.5 million in State Apprenticeship Expansion grants to 36 states and one territory to support the states in developing and implementing comprehensive expansion strategies for apprenticeships. DOL also awarded \$20.4 million through 14 national contracts to expand apprenticeship in specific industries and increase the diversity and inclusion of apprentices.

The State Apprenticeship Expansion Grant Research Study is designed to document the approaches used, and assess grantee and contractor stated lessons learned and progress toward the two main objectives of DOL’s apprenticeship investments – expanding and diversifying apprenticeships. In exploration of these objectives, the study team will document grantees’ and contractors’ activities to expand and diversify apprenticeships, collect information on their perceived challenges and successes in meeting these objectives, and report on the lessons they learned in working to grow registered apprenticeship programs and the number of apprentices. The team also will explore how the activities of the state grantees and contractors have been perceived to influence apprenticeship in all states, including both those that were and were not awarded a State Apprenticeship Expansion grant.

2. *Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

The study will collect data on the implementation of the state expansion grants and intermediary contracts. The data will be used to address the following key research questions:

1. What is the current status of states’ efforts to grow and diversify registered apprenticeship programs and opportunities?
2. What factors are perceived to influence grantees’ and contractors’ efforts to drive apprenticeship expansion and diversity?
3. What partnerships have been developed at the state level to promote and diversity apprenticeships?
4. What factors are perceived to affect grantees’ implementation of their State Apprenticeship Expansion grants?
5. How are grant and contract funds being used to promote and diversify apprenticeships?

6. What state policies exist or are in development to support expansion of apprenticeships?
7. What practices or strategies are perceived to be promising?

The research questions will be addressed using a comprehensive, integrated approach incorporating data from existing data sources, when possible, and the data collection activities outlined in this package: (1) a survey of states, (2) telephone interviews with state grantees, and (3) telephone interviews with national industry and equity contractors. Responses to all activities are voluntary.

- *State survey.* A 30-minute survey will be administered to workforce system administrators in 50 states, the District of Columbia, and 3 territories (collectively referred to as the “states”) to systematically capture information about their apprenticeship activities and their goals for expanding their states’ registered apprenticeship programs. The survey will capture information such as states’ apprenticeship program characteristics, key partners and their roles, the types of industries targeted, activities conducted, training provided, challenges faced, and promising practices. Respondents will have the option of completing the survey on the web, or returning a hardcopy version of the survey.
- *State grantee telephone interviews.* The study team will conduct two-hour telephone interviews with leaders from each of the 37 State Apprenticeship Expansion grantees. These in-depth interviews will discuss their efforts to build apprenticeship programs and partnerships, efforts to expand interest and use of apprenticeships by individuals and employers, challenges encountered in this work, and strategies used to overcome them.
- *National industry and equity partner telephone interviews.* The study team will conduct two-hour telephone interviews with leaders from each of the 8 national industry intermediaries and 2 national equity partners with ongoing contracts to learn from them about their progress in implementation, the challenges they have faced, their perceived successes, and the lessons they have learned in expanding apprenticeship for their industries and for under-represented populations.

The study team will summarize quantitative data from the state survey. The analysis will include data cleaning, variable construction, and computing descriptive statistics. Some data from the survey will also be qualitatively analyzed to provide a descriptive summary of state apprenticeship efforts. The study team will use qualitative techniques to analyze the data gathered through telephone interviews to understand the perspectives of grantees and contractors. Analysis of the results from these data collection activities will culminate in a final study report about grantees’ implementation experiences in 2019. All findings are to be considered descriptive and are based on the triangulation of multiple perspectives across the various key stakeholders.

The descriptive data collected will be used by the evaluation team, led by Mathematica, to comprehensively and systematically describe states’ reported apprenticeship activities, with a particular focus on the State Apprenticeship Expansion grantees and the national

intermediary and partner contractors. They will describe key themes and patterns in the data, including patterns in states' structure for their apprenticeship efforts, and the strategies reported by grantees and contractors in their work promoting the expansion and diversity of registered apprenticeships. These data and the study team's analyses will be used by DOL and other policymakers to guide decisions regarding the oversight and management of the registered apprenticeship system, as well as future planning efforts for similar grant programs.

Without conducting these data collection efforts, DOL and other stakeholders would be unable to assess the challenges that states and industry organizations report in addressing the gaps in the workforce system through apprenticeship. They would be unable to determine what could be learned from the efforts of states and intermediaries to advance the apprenticeship sector, and how the registered apprenticeship system could better serve the nation's workforce.

All materials developed from the analyses of these data collection efforts are intended to reach audiences including:

- DOL and other federal agency staff
- State and local workforce agencies and partner organizations
- Researchers
- Policymakers at the local, state and federal levels of government looking to design similar programs

3. *Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.*

The data collection efforts will use advanced technology to reduce burden on respondents wherever possible. Although respondents will receive a hardcopy version of the state survey, it is anticipated that the survey will be fielded primarily through the web, as it can be accessed and completed from any computer. Additionally, this mode will allow for respondents to partially complete the survey and return to it at a later time if desired. The use of a web survey also allows the study team to make use of logical skips, check lists, and drop-down menus to reduce burden on the respondent. The semi-structured interviews will utilize web conferencing software to conduct phone interviews, allowing respondents to join the call at their convenience using a call-back (and toll-free) feature. The use of this software also allows multiple staff to join a call from multiple locations when necessary.

4. *Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

Systematically collected data from states, State Apprenticeship Expansion grantees, and national industry intermediary and equity partner contractors is not otherwise available from existing sources including grant applications and quarterly performance reports. Although the Office of Apprenticeship's technical assistance provider collects some information on state progress on State Apprenticeship Expansion grant performance measures, the survey and interview data being collected for the study cover a much broader range of topics with more depth than is available through the technical assistance provider. Where overlap exists, the information already collected through technical assistance efforts will be confirmed during interviews rather than requested anew; the remainder of the interviews will only request new information. Respondents will not be asked for the same information more than once.

5. *If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.*

Respondents for the proposed data collection are state employees and national contractors. It is possible that some targeted respondents might involve partners, such as industry association leaders or subject matter experts, to respond to the data collection and some of these partners might be small businesses. They will likely be brought in to answer targeted subsets of questions rather than to attend an entire interview. To minimize burden on any small businesses that participate in the interviews, decisions about the timing of interviews will consider their staff schedules. As with all data collection activities, participants will be reminded that their participation is completely voluntary.

6. *Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

The proposed data collection will occur one time under this request. If these data are not collected through the state survey and grantee and contractor interviews, DOL and other stakeholders will not have the knowledge necessary to understand states' efforts to expand and diversify apprenticeships, and would be unable to assess the challenges that states and industry organizations report facing as they address the gaps in the workforce system through apprenticeship. It would also be unclear how states' perceive the role of the State Apprenticeship Expansion grants in the larger context of their efforts to expand apprenticeship, and how that could influence the design and management of future grant programs. Information about the practices and strategies that states and intermediaries have implemented to advance the apprenticeship sector would not be documented and shared with other states and potential intermediaries. Without this data collection, DOL would miss an opportunity to understand how the registered apprenticeship system could better serve the nation's workforce.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5.*

There are no special circumstances associated with this information collection. In all respects, the data will be collected in a manner consistent with federal regulations.

8. *If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.*

Describe efforts to consult with persons outside the agency to obtain their 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, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years—even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with the Paperwork Reduction Act of 1995, the public was allowed 60 days to comment through the Federal Register Notice posted on August 8, 2018 (83 FR 39130). No public comments were received.

Consultations on the research design, sample design, and data needs were part of the study design phase of the State Apprenticeship Expansion Grant Research Study. The purposes of these consultations were to ensure the technical soundness of the study, the relevance of study findings, and to verify the importance, relevance, and accessibility of the information sought in the study. Only members of the research team provided input on the development of the study.

9. *Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.*

Respondents will not receive payments. Responses provided by state, contractor, and other staff are expected to be carried out in the course of their employment, and no additional compensation will be provided outside of their normal pay.

10. *Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.*

The study team will take a number of measures to safeguard the data that are collected as part of this clearance request. Individual respondents will be informed that their participation is voluntary, that they can decline to answer any questions that they prefer not to answer, and that all responses will be used for research purposes only. Further, they will

be assured that no individual respondents will be identified, unless required by law, and all data will be securely stored.

The contractor complies with DOL data security requirements by implementing security controls for processes that it routinely uses in projects that involve sensitive data. Information collected will be kept private to the extent permitted by law. The contractor's procedures for handling secure data are consistent with the Privacy Act of 1974, the Computer Security Act of 1987, the Federal Information Security Management Act of 2002, OMB Circular A-130, and National Institute of Standards and Technology computer security standards. The contractor secures personally identifiable information and other sensitive project information and strictly controls access on a need-to-know basis.

11. *Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

The data that are part of this clearance request do not include any questions that may be deemed sensitive.

12. *Provide estimates of the hour burden of the collection of information.*

1. Hours by activity

Table A.1 provides the estimated annualized respondent hour and cost burden for each of the data collection activities for which this package requests clearance. The total estimates are divided by the years of the study – two years – to obtain the annual estimates. The following summarizes the burden estimates for each of the data collection activities:

State survey. The study team estimates a 90 percent completion rate; that is, 48 of the 54 “state” administrators will complete the state survey. Annualized over 2 years, this is an annual number of state survey respondents of 24 (see Table A.1). Each survey will take 30 minutes to complete. The total burden for the state survey is $48 \times 30/60$ hours = 24 hours. Annualized over 2 years, this is annual burden of 12 hours.

Semi-structured telephone interviews with state grantees. The study team will conduct one, two-hour phone interview with administrators from the 37 State Apprenticeship Expansion grantees, which is a total of 37 respondents. Annualized over 2 years, this is an annual number of state grantee respondents of 19 (see Table A.1). The estimated total burden is 37×2 hours = 74 hours. Annualized over 2 years, this is an annual burden of 37 hours.

Semi-structured telephone interviews with national intermediaries. The study team will conduct one, two-hour phone interview with leaders of eight national industry

intermediaries and two national equity partners, for a total of 10 intermediary respondents. Annualized over 2 years, this is an annual number of intermediary respondents of 5 (see Table A.1). The estimated total burden is 10 X 2 hours = 20 hours. Annualized over 2 years, this is an annual burden of 10 hours.

2. Total estimated annualized burden hours and monetized costs

The total annualized burden hours for the data collection included in this request for clearance is 59 hours (see Table A.1), which equals the sum of the estimated burden for the state survey (12 hours), telephone interviews with state grantees (37 hours), and telephone interviews with national intermediaries (10 hours).

To calculate the estimated cost burden for respondents, average hourly wages from the U.S. Bureau of Labor Statistics, National, State, Metropolitan, and Nonmetropolitan Area Occupational Employment and Wage Estimates, for 2017 were used. The average wages for “General and Operations Managers” (\$59.35) were multiplied by the number of hours per respondent type (see Table A.1).

This results in a total, annualized burden cost of \$3,502 (\$712 for state administrators + \$2,196 for state grant administrators + \$594 for national industry and equity contractors). The total monetized burden for the two-year period is \$7,004 (\$3,502 X 2 years).

Table A.1. Estimated annualized respondent hour and cost burden

Type of Instrument (Form/Activity)	Number of Respondents ^a	Number of Responses per Respondent	Total Number of Responses	Average Burden Hour per Response (in Hours)	Estimated Burden Hours	Average Hourly Wage ^b	Annual Burden Costs
State survey	24	1	24	30/60	12	\$59.35	\$712
Semi-structured telephone interviews (state grantee administrator)	19	1	19	2	37	\$59.35	\$2,196
Semi-structured telephone interviews (national industry and equity contractor)	5	1	5	2	10	\$59.35	\$594
Unduplicated Totals	48	--	48	--	59	--	\$3,502

^a DOL seeks a clearance period of two years

^b The average hourly wages were obtained from the U.S. Bureau of Labor Statistics, National, State, Metropolitan, and Nonmetropolitan Area Occupational Employment and Wage Estimates, May 2017. Estimates are based on the average wages for General and Operations Managers: \$59.35.

13. *Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).*

There are no additional costs to respondents other than their time.

14. *Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.*

DOL, as with most other federal agencies, contracts with firms that have proven experience with program evaluation to conduct evaluation activities. Federal employees rely on contractor staff to perform the majority of the work described in this package and have no direct role in conducting site discussions or focus groups, developing study protocols or designs, collecting data directly using these instruments, or analyzing or producing reports using these data. The role of federal staff is almost entirely restricted to managing these projects. The costs that contractors incur to perform these activities are essentially direct federal contract costs associated with conducting site visits, discussions, and focus groups.

This estimate of federal costs is a combination of (1) direct contract costs for planning and conducting this research and evaluation project, including any necessary information collection and (2) salary associated with federal oversight and project management.

1. Estimates of direct contract costs

Three categories of direct costs to the federal government are associated with conducting this project. These costs are routine and typical for studies such as this. The first category is design and planning. This work is estimated to cost \$99,711. The second category is data collection, which will occur through the project period, and is estimated to cost \$179,040. The final category is for analysis and reporting. This category includes synthesizing the findings into conclusions and producing deliverables, such as reports. This work is estimated to cost \$213,908. The total estimated direct costs are:

$$\$99,711 \text{ (design)} + \$179,040 \text{ (data collection)} + \$213,908 \text{ (reporting)} = \$492,659$$

The total estimated direct costs can be divided by the two years of the study to produce an estimate of the average annualized cost:

$$\$492,659 \div 2 \text{ years of study} = \$246,330 \text{ per year in estimated direct contract costs.}$$

Although this project is expected to have a duration of two years, an accurate estimate of the annualized direct contract cost will vary considerably from year to year because each of the three categories of costs is focused on a specific period in the project life cycle. The design and planning costs are incurred at the beginning of the project, the data collection costs will be incurred throughout most of the project, and the analysis and reporting costs will occur close to the end of the project.

2. Estimates of federal oversight and project management costs

ETA staff have regular duties and responsibilities for initiating, overseeing, and administering contracts to perform research and evaluation on behalf of agency programs and offices. To carry out the implementation study, federal staff will need to perform certain functions that, although clearly part of their normal duties, are directly attributable to this specific research and evaluation project. For purposes of calculating federal salary costs, DOL assumes:

- i. We expect that one GS-13, step 8 employee, based in the ETA in Washington, D.C., who would earn \$57.31 per hour would perform this work, and would spend approximately 200 hours on this project annually. Total estimated federal costs, on an annualized basis for this individual, are 200 hours X \$57.31/ hour = \$11,462. Over the two year clearance period, this comes to \$22,924 (\$11,462 X 2).

Wages are drawn from the currently available estimates of wages and salaries available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf. A summary of estimated federal costs for the State Apprenticeship Expansion Grant Research Study evaluation is presented in Table A.2.

Table. A.2 Summary table of estimated federal costs for the State Apprenticeship Expansion Grant Research Study

Estimates of direct contract costs	
Design and planning for the study	\$99,711
Data collection	\$179,040
Analysis and reporting	\$213,908
Subtotal for direct contract costs	\$492,659
Estimates of direct federal staff costs	
1 GS-13 (400 hours)	\$22,924
Subtotal for federal oversight and management	\$22,924
Total cost	\$515,583

Note: Federal staff costs are based on Salary Table 2018-DCB (Step 8, incorporating the 1.4 percent general schedule increase and a locality payment of 28.22 percent for the locality pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA); DOL grade ranges are as of January 2018 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf).

15. *Explain the reasons for any program changes or adjustments reported on the burden worksheet.*

This is a new information collection.

16. *For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the*

time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Data collection activities will commence upon the receipt of OMB approval. We anticipate that data collection will take place over four months. A final report in 2019 will summarize findings from the study. Additionally, the study team plans to hold up to four annual briefings with DOL on topics of interest to the overall evaluation.

17. *If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

The OMB approval number and expiration date will be displayed or cited on all forms completed as part of the data collection.

18. *Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”*

There are no exceptions to the certification statement.