**Justification for Non-Material Change to OMB 1290-0015**

This memo requests a non-material change to the Paperwork Reduction Act (PRA) package previously approved by the Office of Management and Budget (OMB Control No. 1290-0015) for data collection from February 2018-2021. When OMB approved this data collection in February 2018, the terms of clearance is for Department of Labor (DOL) to provide OMB with a report describing the results of the proposed incentive levels compared to previous incentive levels in earlier waves of data collection, within 18 months of approval. This purpose of this memo is to request an extension on this report due to unanticipated challenges that had prolonged the data collection.

The data collection had experienced several unanticipated challenges, which caused a delay in completing the survey fielding. These challenges include a lower than expected response rate from declining telephone responses, which is associated with a trend of fewer households with landline phones, and a widespread usage of cell phone screening apps. To accommodate these challenges, the Chief Evaluation Office at DOL has extended the contract’s period of performance end date from August 21, 2019 to April 21, 2020, in order to provide sufficient time for the research team to analyze the survey data collected and report of the survey findings, including the results of the incentive structure.

Due to the shifting timeline for the project, DOL is requesting an extension on the report describing the results of incentive structure for this data collection in comparison to previous waves of data collection. DOL anticipates the report to be completed and submitted to OMB by April 2020.