PART A: JUSTIFICATION

The Chief Evaluation Office of the U.S. Department of Labor (DOL) has commissioned an evaluation of the America's Promise Job-Driven Grant program (America's Promise). This program aims to create or expand regional partnerships that will identify the needs of specific industry sectors relying on the H-1B visa program to hire skilled foreign workers and prepare the domestic workforce for middle- and high-skilled, high-growth jobs in those sectors. The America's Promise evaluation offers a unique opportunity to build knowledge about the implementation and effectiveness of these regional partnerships. Additionally, as the grants are in a mature state of operation, this evaluation is in a unique position to be able to learn about how grantees' established programs, employer partnerships, and service delivery approaches might be changing as a result of the COVID-19 pandemic. Mathematica Policy Research and its subcontractor Social Policy Research Associates have been contracted to conduct an implementation and impact evaluation. A request to collect information for data collection activities associated with the implementation evaluation, as required by the Paperwork Reduction Act (PRA) was approved by the Office of Management and Budget (OMB) (OMB Control Number 1290-0020) on February 2, 2019. This package requests clearance for five additional data collection activities as part of the implementation evaluation:

1. Program stakeholder interview protocol (in-person, if feasible, or else virtual)
2. Employer interview protocol
3. Participant focus group protocol
4. Participant focus group information form
5. Program stakeholder interview protocol (telephone)

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.*

A skill gap between the qualifications of American workers and the needs of many American businesses has persisted. U.S. firms annually sponsor hundreds of thousands of nonimmigrant H-1B visas to fill skilled positions.[1] To reclaim some of these jobs for the American workforce, in January 2017, DOL awarded more than $110 million to 23 grantees for America's Promise. The purpose of these four-year grants is to support local partnerships between workforce agencies, employers, industry representatives, training providers, community-based organizations, and economic development agencies to identify the needs of specific industry sectors relying on the H-1B visa program for workers and implement career pathway programs that build the skills of the domestic workforce for middle- and high-skilled jobs in those sectors.

[1] U.S. Department of State. "Report of the Visa Office 2016, Table XVI (B) Nonimmigrant Visas Issued by Classification (Including Border Crossing Cards) Fiscal Years 2012–2016." Washington, DC: U.S. Department of State, 2017. Available at https://travel.state.gov/content/visas/en/law-and-policy/statistics/annual-reports/report-of-the-visa-office-2016.html

Citation of sections of laws that justify this information collection: The America's Promise grant program and subsequent evaluation are authorized by Title 29 of the American Competitiveness and Workforce Improvement Act, which states that "the Secretary of Labor shall . . . award grants to eligible entities to provide job training and related activities for workers to assist them in obtaining or upgrading employment in industries and economic sectors . . . projected to experience significant growth and ensure that job training and related activities funded by such grants are coordinated with the public workforce investment system (29 USC 3224(a))."

A request to collect information for data collection activities associated with the implementation evaluation was approved by the OMB (1290-0020) on February 2, 2019. This package requests clearance for five additional data collection activities which need to start in May 2020 as part of the implementation evaluation. Given that the America's Promise grants end in December 2020, a timely start to the information collection is critical for providing DOL near real-time information about how the grants were implemented as well as if and how they were adapted during the COVID-19 pandemic.

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 data collected through the activities summarized in this request will be used by DOL to comprehensively describe implementation of the America's Promise grant program, including its partnerships, training and support services provided, target population, and common implementation successes and challenges, including how they adapted during the COVID-19 pandemic. Although not addressed through instruments included in this request, the evaluation will also assess the impacts of America's Promise on participant outcomes (during time periods that will examine participant outcomes both before and after the pandemic began). This analysis will involve existing administrative data sets, which does not require OMB approval. These data and the evaluation team's descriptive and impact analyses will provide DOL and other policymakers with important information to guide management decisions, support future planning efforts regarding such grant programs, including those that will be funded during the pandemic, and share evidence of the effectiveness of training approaches for middle- and high-skill occupations.

1. Overview of the evaluation

The evaluation of America's Promise includes two components: (1) an implementation evaluation to understand program implementation and partnership development and (2) an impact evaluation to measure the effects of America's Promise on participant outcomes. Both components will take place over five years (2017 to 2022) and will address the following research questions:

1. How were regional partnerships developed and maintained? What factors did site visit respondents report as influencing partnership development and employer engagement? (implementation evaluation)
2. What types and combinations of services and approaches were provided? How were they implemented? (implementation evaluation)

3. What were the characteristics of enrolled participants? (implementation evaluation)

5. What was the regional and community context of the America's Promise grantees? (implementation evaluation)What changes did America's Promise grantees make to their programs as a result of the COVID-19 pandemic?

6. What impact did America's Promise have on participants' labor market outcomes?

7. How did the impact of America's Promise vary by participant characteristics or program components?

The implementation evaluation component will answer research questions 1-4. This component includes a grantee survey involving all 23 grantees; review of grant documents from all 23 grantees; a partner network survey involving approximately six grantees; interviews with program stakeholders and employers as well as participant focus groups during site visits to 12 grantees (planned to be in-person, if feasible); and telephone interviews with program stakeholders from the remaining 11 grantees. The PRA request approved by OMB on February 5, 2019 (OMB Control Number 1290- includes the grantee survey and the partner network. This PRA clearance request includes the protocols that will be used during the on-site and telephone interviews and focus groups. The impact evaluation component will use administrative data to address research questions 6 and 7.

The 12 sites selected for in-person site visits will include the six sites selected for the partner network survey (see 83 FR 51984), as well as an additional six sites identified through data collected in the grantee survey (see, again, 83 FR 51984) that appears to meet key criteria of interest to DOL. These criteria include the structure and maturity of partnerships, number and strength of employer partnerships, type of sector, population served, type of training, urbanicity, and region. The 11 sites not selected for in-person site visits will participate in telephone interviews.

2. Overview of the data collection

Understanding the implementation and effectiveness of America's Promise requires data collection from multiple sources. The implementation evaluation data collection instruments included in this clearance request include the protocols that will be used to conduct in-person (if feasible) interviews and focus groups during site visits for approximately 12 of 23 grantees and telephone interviews for the 11 remaining grantees, beginning in May 2020. Interviews conducted in person will be in-depth, using a semi-structured master protocol with open-ended question prompts; telephone interviews will be conducted using a subset of questions from the same semi-structured protocols used for the in-depth site visits. Telephone interviews will prioritize topics of interest to DOL and the analysis: community context, organization, and administrative structure; recruitment, enrollment, and participant characteristics; America's Promise services; and alternative services, outcomes, and sustainability. This package seeks clearance for interview protocols for three types of respondents: program stakeholders, employers, and small groups of current and former program participants.

1. **Program stakeholder interview protocol (in-person).** This protocol will be used to conduct in-person interviews with grantee managers, staff, and key members of the regional partnership (again, if feasible; if not, these will be done virtually). This protocol will cover program structure, community context, recruitment, service overview, alternative services

available, what changes to the program made as a result of the COVID-19 pandemic (including whether and how employer partnerships were influenced), participant characteristics and outcomes, and sustainability. The in-person interviews are expected to take between 60 and 105 minutes, depending on respondent type. In the event that an in-person interview cannot be conducted during the site visit, the interview will be conducted via telephone using the in-person interview protocol to ensure that similar topics are discussed with all respondents.

2. **Employer interview protocol.** This protocol will be used in semi-structured interviews to collect information on employers' roles in service design and implementation (including whether COVID-19 changed their training needs or role in the program), their perception of the quality and effectiveness of program services, whether they hire or advance participants, and whether participants acquire the skills required to be successful. It will also provide important insight on the local economic context, including how COVID-19 has affected their industry locally. This interview will be conducted in person during the site visits and is expected to take approximately 60 minutes to complete. If we are unable to schedule interviews while on-site, they will be conducted via telephone at a later date.

3. **Participant focus group protocol.** This protocol will be used to conduct focus groups with a small number of participants at each visited site. This protocol will gather data on their backgrounds, reasons for seeking program services, experiences with America's Promise, and outcomes after participating. Consent to participate in the research study will be obtained from all focus group participants. To fully ensure informed consent, the study team will collect written consent from all participants at the start of each focus group. Written consent forms will describe the purpose of the study; outline the information that will be collected; explain the risks, benefits, and voluntary nature of participation; and collect participants' consent to participate in the focus groups. These groups will be conducted in person and are expected to take approximately 90 minutes to complete.

4. **Participant focus group information form.** This form will be distributed to focus group participants for completion at the beginning of each focus group. The information form will collect details on participant demographics, education and employment history and America's Promise program participation. The form is expected to take approximately five minutes to complete.

5. **Program stakeholder interview protocol (telephone).** This protocol will be used to conduct telephone interviews with grantee managers, staff, and key members of the regional partnership. This protocol will cover community context, organization, and administrative structure; recruitment, enrollment, and participant characteristics; America's Promise services; and alternative services, outcomes, and sustainability. The telephone interviews are expected to take approximately 120 minutes to complete.

Proposed uses for each data collection activity are described in Table A.1.

Table A.1. How data will be used, by data collection activity

Data collection activity	How the data will be used

1.	Program stakeholder interviews (in-person)	We will conduct in-person interviews (if feasible) with America's Promise grantee and partner staff to describe program structure, community context, recruitment and participant characteristics, service overview, alternative services available, changes the program made as a result of COVID-19, outcomes and sustainability.
2.	Employer interviews	We will conduct in-person interviews (if feasible) with employers to describe their role in service design and implementation, their perception of the quality and effectiveness of services, whether they hire or advance participants, whether participants acquire the skills required to be successful, and whether their training needs or role in the program changed as a result of COVID-19.
3.	Participant focus groups	We will conduct in-person focus groups with a subset of participants to describe participant characteristics, reasons for seeking services, experiences with America's Promise, and outcomes after participating.
4.	Participant focus group information form	We will administer the information form to describe characteristics of the population participating in the focus groups.
5.	Program stakeholder interviews (telephone)	We will conduct telephone interviews with America's Promise grantee and partner staff to describe community context, organization, and administrative structure; recruitment, enrollment, and participant characteristics; America's Promise services; and alternative services, outcomes, and sustainability.

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 evaluation team will primarily use email to help facilitate the logistics and scheduling of the site visits and interviews to reduce the burden on participants. Site visitors for the evaluation of America's Promise will use electronic audio recorders to record the semi-structured interviews. This will allow the visitors to conduct interviews in the shortest amount of time possible, as they will not be required to use interview time to take notes on the content of the conversation. There will be no other information technology used by site visitors.

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.*

The evaluation of America's Promise will not require collection of information that is available through alternate sources. For example, the evaluation will use available information from grantee applications and existing administrative data sets to ensure that data collected through interview and focus groups are not available elsewhere.

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

Interviews could be conducted with employers or program stakeholders from small businesses or other small entities. We will only request information required for the intended use and minimize burden by restricting the length of interviews to the minimum required time.

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.*

If the in-person and telephone interviews are not conducted, DOL and other stakeholders will not have the information necessary to answer key research questions of the evaluation. Without collecting the information specified in the site visit and telephone interviews, a comprehensive implementation analysis of America's Promise could not occur. This would prevent information being provided to policymakers about the context in which the partnerships and programs operated (both before and during the pandemic), any operational challenges faced by grantees and partners, how the partnerships and services evolved over time, how grantees adapted during the pandemic, whether the approaches were effective and implications for interpreting results (particularly as the evaluation will measure participant outcomes at time periods covering both before and during the pandemic), or implications for program improvement based on evidence obtained through the evaluation – particularly those being funded in the next several months.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner:*

** Requiring respondents to report information to the agency more often than quarterly;*

** Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*

** Requiring respondents to submit more than an original and two copies of any document;*

** Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*

** In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*

** Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*

** That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*

** Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

No special circumstances apply to this data collection.

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.*

A 60-day notice to solicit public comments was published in the *Federal Register*, 83 FR 54943 on November 1, 2018 (title correction was published on 83 FR 55561 on November 6, 2018). One comment was received. It suggested that the program was ineffective and costly, but no evidence was provided in support of the statement. DOL acknowledged receipt of the comment. In fact, the purpose of this evaluation is to provide evidence as to the effectiveness of the program and understand strategies to support on-going program improvements.

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.

Consultation on the research design and data needs is being coordinated by the evaluation team and involves discussions with experts and site-level program staff. The purpose of consultation with outside experts is to ensure the technical soundness of the evaluation and the relevance of evaluation findings and to verify the importance, relevance, and accessibility of the information sought in the evaluation. These experts participating in the evaluation technical working group are listed in Table A.2. The purpose of the consultation with program staff was to better understand the feasibility of the research design within the regional context of grantees.

Table A.2. Individuals providing consultation on America's Promise evaluation design

Peter Mueser, PhD Professor, Department of Economics and Truman School of Public Affairs University of Missouri Columbia, MO 65211
Mary Alice McCarthy Director, Center on Education and Skills New America 740 15th Street NW, Suite 900 Washington, DC 20005

Margaret Hargreaves
Principal Associate
Community Science
438 N. Frederick Avenue, Suite 315
Gaithersburg, MD 20877

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

There are no payments or gifts to program and partner staff, as activities are expected to be carried out in the course of their employment, and no additional compensation will be provided outside of their normal pay. Respondents participating in the participant focus groups will receive a $25 gift card.

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

Information collected will be kept private to the extent permitted by law. The evaluation team complies with DOL data security requirements by implementing security controls for processes that it routinely uses in projects that involve sensitive data. Further, the evaluation is being conducted in accordance with all relevant regulations and requirements.

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.*

There are no sensitive questions included in the interview protocols for program stakeholders or employers. Participant focus groups will collect demographic data such as gender, employment status, education level, and sources of financial support. This information will describe focus group participant backgrounds and reasons for seeking services through America’s Promise, which could be considered sensitive. The information will be important for interpreting the qualitative focus group data and comparing data across grantee sites. Past evaluations have included similar questions without any evidence of significant harm. As described earlier, all sample members will be assured of the privacy of their responses before being asked to fill out the form and will be informed that they can skip any questions they do not wish to answer. All data will be reported in aggregate, summary format only, eliminating the possibility of individual identification and ensuring that individual responses are private.

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

** Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance.*

Generally, estimates should not include burden hours for customary and usual business practices.
** If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.*
** Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "Annual Cost to Federal Government."*

Table A.3 provides annual burden estimates for each of the data collection activities for which this package requests clearance. All of the activities covered by this request will take place over a three-year period. 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 May 2018 were multiplied by the number of hours per respondent type. The following summarizes the annual burden estimates for each of the five data collection activities:

Program stakeholder interviews (in-person). Grantee and partner staff interviews will be conducted for 12 grantee sites in-person. On average, in-person interviews with grant managers and other stakeholders will take 75 minutes to complete. Two grantee staff—the grant manager and another key staff member--and 8 non-employer partner staff are expected to be interviewed for each in-person site visit, for a total of 10 stakeholders per grantee. The total burden for site visit interviews is 150 hours (10 stakeholders x 12 grantees x 75/60 hours); the annualized burden is 50 hours.

Employer interviews. Employer interviews will be conducted in person during the course of the 12 grantee site visits with a total of 24 respondents (2 employers × 12 grantees). If the evaluation team is unable to schedule these interviews during the site visit window, they may be conducted via telephone after the visit has occurred. These interviews will take 60 minutes to complete. Total burden for the employer interviews is 24 hours (24 respondents × 60/60 hours); the annualized burden is 8 hours.

Participant focus groups. Focus groups with a subset of participants will take place during in-person site visits. Each focus group will take 90 minutes to complete. Five participants are expected to participate at each of the 12 sites visited, for a total of 60 respondents (5 participants × 12 grantees). The total burden is 90 hours ((60 respondents) × 90/60 hours); the annualized burden is 30 hours.

Participant focus group information form. Forms will be administered with participants at the start of each focus group. Each form will take 5 minutes to complete. Five participants are expected to participate at each of the 12 sites visited, for a total of 60 respondents (5 participants × 12 grantees). The total burden is 5 hours (60 respondents) × 5/60 hours); the annualized burden is 2 hours.

Program stakeholder interviews (telephone). Grantee and partner staff interviews will be conducted via telephone for 11 grantees. The telephone interviews will take 120 minutes to complete. Two grantee staff and 2 partner staff are expected for each phone call, for an overall total of 4 stakeholders. The total burden for phone interviews is 88 hours (4 stakeholders x 11 grantees × 120/60 hours); the annualized burden is 29 hours.

Table A.3. Estimated Annualized Respondent Hour and Cost Burden

Data Collection Activity	Number of respondents	Number of responses per respondent	Total number of responses	Average burden per response (in hours)	Annual estimated burden hours	Average hourly [a]	Annual monetized burden hours
Semi-structured program stakeholder interviews (in-person)	40	1	40	75/60	50	$45.36	$2,268
Employer interviews	8	1	8	60/60	8	$45.36	$363
Participant focus groups	20	1	20	90/60	30	$18.58	$557
Participant focus group information form	20	1	20	5/60	2	$18.58	$37
Semi-structured program stakeholder interviews (telephone)	15	1	15	120/60	30	$45.36	$1,361
Unduplicated Total	**103**	--	**103**		**120**		**$4, 586**

[a] The hourly wage of $45.36 is the May 2018 median wage across Education Administrators, Postsecondary (see http://www.bls.gov/oes/current/oes_nat.htm); $18.58 is the May 2018 median wage across all occupations in the United States

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).*

** The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.*

** If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.*

** Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

There are no direct 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.*

The total cost to the Federal government over three years is $427,486, and annualized cost to the federal government is $142,495. Costs result from the following categories:

The estimated cost to the federal government for the contractor to carry out the site visit interviews and the telephone interviews is $368,188[2]. Annualized, this comes to $122,729:

$$\frac{\$368{,}188}{3} = \$122{,}729$$

The annual cost borne by DOL for federal technical staff to oversee the contract is estimated to be $19,766. We expect the annual level of effort to perform these duties will require 200 hours for one federal GS 14 step 4 employee based in Washington, D.C., earning $61.77 per hour. (See

[2] The total contractor cost includes the cost for $25 gift cards paid to focus group participants.

Office of Personnel Management 2019 Hourly Salary Table at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/DCB_h.pdf . To account for fringe benefits and other overhead costs, the agency has applied multiplication factor of 1.6:

200 hours × $61.77 × 1.6 = $19,766.

Thus the total annualized federal cost is $122,729+ $19,766= $142,495.

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

This is a new information collection. There is an increase of 120 burden hours per year. The data collected through the activities summarized in this request will be used by DOL to comprehensively describe implementation of the America's Promise grant program, including its partnerships, training and support services provided, target population, and common implementation successes and challenges, including how they adapted during the COVID-19 pandemic.

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.*

1. Analysis plan

The Consolidated Framework for Implementation Research will be used to guide the analysis of implementation data gathered from all 23 grantees, including identification of facilitators and barriers.[3] This framework was developed to facilitate systematic assessment of the implementation context to reveal the factors that influence implementation, common implementation challenges, and promising strategies for replication.

Analysis of interview data will involve coding and triangulating across data sources. The evaluation team will begin by writing up detailed field notes from in-person and telephone interviews in a structured format. To code the qualitative data for key themes and topics, a coding scheme will be developed and organized according to key research questions and topics and guided by the conceptual framework as well as constructs from the Consolidated Framework for Implementation Research on factors that affect implementation. Each segment of coded data will be assigned a negative or positive flag to identify barriers to and facilitators of implementation. This process will reduce the data into a manageable number of topics and themes for analysis (Ritchie and Spencer 2002).[4] The evaluation team will then code the data using qualitative analysis software. To ensure reliability across team staff, all coders will code an initial set of documents and compare codes to identify and resolve discrepancies. These data will be used to describe the nuances of how and why partnerships developed as they did, and to explore implementation challenges and promising practices.

[3] Damschroder, L.A., D.C. Aron, R.E. Keith, S.R. Kirsh, J.A. Alexander, and J.C. Lowery. "Fostering Implementation of Health Services Research Findings into Practice: A Consolidated Framework for Advancing Implementation Science," *Implementation Science*. vol. 4, no. 7, August 7, 2009.

[4] Ritchie, J., and L. Spencer. "Qualitative Data Analysis for Applied Policy Research." In The Qualitative Researcher's Companion, edited by M. Huberman and B. Miles. London: Sage, 2002.

2. Publications

In early 2022, we will produce a report on the implementation and impact evaluations, as well as produce other dissemination products such as fact sheets and issue briefs on topics of interest to DOL in as timely a manner as possible to support DOL's decision-making during the pandemic.

17. *If seeking approval to not 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."*

No exceptions are necessary for this information collection.