

**SUPPORTING STATEMENT
QUICK-TURNAROUND SURVEYS, PART A
OMB CONTROL NO. 1205-0436**

The Employment and Training Administration (ETA) of the U.S. Department of Labor (DOL) seeks an extension without change of a currently approved collection by the Office of Management and Budget (OMB). The collection is for a “generic” clearance that allows for expedited review (on a “quick turnaround” basis) by OMB of a series of short surveys that will collect data from State workforce agencies, local workforce investment areas, and other entities involved in employment, training, and related programs. The surveys will focus on a variety of issues concerning the very broad spectrum of programs administered by ETA including, but not limited to, the governance, administration, funding, service design, and delivery structure of workforce programs authorized by the Workforce Innovation and Opportunity Act (WIOA) of 2014 and other statutes.

A. JUSTIFICATION.

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.

This request is for renewal of an approved “generic” information collection that allows submission of short surveys to OMB for a “quick turnaround” review of 15 days of up to twenty (20) surveys over three years. Section 169 of the Workforce Innovation and Opportunity Act (WIOA) (PL 113-128) is the authority by which ETA will collect the majority of the information proposed in this request, covering WIOA programs and “other employment-related programs and activities under other provisions of law.” (Individual ICRs for future surveys will identify the authority to collect information, should they differ from Section 169 of WIOA.)

The ability to conduct “quick turnaround” surveys is critical for ETA, in its role of providing program oversight, technical assistance, guidance, and policy development, as well as in planning and conducting evaluation and research projects that help inform those other activities. Accurate, timely information can help ETA properly discharge its obligations to issue policy clarifications, regulations, and to provide information to support rapid and continuous improvements in service quality or management at the State and local level. This is especially true in light of national priorities and emergencies that affect the workforce, such as those related to critical health issues, natural disasters, or economic challenges that are ongoing or may emerge in future.

Much of the information available to ETA is not accessible on a timely basis or is limited as to scope or detail. From example, administrative data often lacks critical details, while information from long-term in-depth evaluations typically are not designed to elicit information quickly on emerging issues. Thus ETA has a need for the timely and detailed information on emerging topics, that can be gleaned only with short, “quick turnaround” surveys.

According to the plan, eight (8) to twenty (20) surveys would be administered over the next three years, with each survey being simple and relatively short (10-30 questions). Depending on the nature of the questions, the surveys would be conducted at the state or local level or some combination of both, and might entail surveys of State Workforce Agencies, local Workforce Boards, American Job Centers, offices of other local-area partners, other ETA programs, business, or other relevant entities. Each survey would be designed on an ad hoc basis over the three-year period, and would focus on topics of pressing policy or administrative interest. Topics and questions would, for example, address issues raised by ETA's National Office and Regional Staff, OMB itself, Congress, or by States and localities themselves. The surveys would be conducted either directly by ETA or by DOL's Chief Evaluation Office (CEO), which also conducts evaluation and research projects on employment and training programs, in collaboration with ETA.

Examples of topic areas include but are not limited to the following:

- Local management information systems;
- New processes, procedures, and methods for providing training, case management or other services;
- Services to different target groups;
- Integration and coordination with other programs; and
- Governance issues, such a State or Local Workforce Investment Board membership and training

Consistent with the existing process under OMB Control # 1205-0436, the following process would be followed for review and clearance of each individual survey:

(1) DOL would submit the following to OMB for review:

- An abbreviated supporting statement, of 1 – 2 pages, that provides information on the following:
 - The purpose of and topics to be covered in the survey,
 - A description of the expected respondents;
 - Estimates of the burden and federal costs;
 - Data collection methods and the likely response rate;
 - Privacy protections for respondents;
 - The intended use of the resulting data;
 - A description of the statistical methodology, if any; and
 - An inventory of surveys approved under the OMB control number assigned to this ICR; and
- A signed clearance form from DOL's Chief Evaluation Office approving the statistical methodology, if any is proposed; and
- The survey instrument, including assurances regarding privacy and instructions for completing and submitting the responses.

(2) OMB will review the materials and submit any questions or comments to ETA within 15 working days of the submission to OMB; and

(3) OMB and ETA will then work collaboratively to resolve any outstanding issues.

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.*

Quick turnaround surveys fill a critical gap in ETA's information needs about how the workforce system is unfolding and have the potential to inform development of legislation, regulations, technical assistance, and research. The availability of this quick turnaround mechanism has proved to be a valuable method for gathering information relevant to ongoing policy issues and research projects. Recent examples of topics for surveys conducted under the current generic clearance include the following:

- o Cognitive Testing of a Student Assessment Survey in Job Corps,
- o Job Corps Centers' Use of Technology-Based Learning for Basic Skills, and
- o Use of Technology-Based Learning in American Job Centers.

These surveys have been useful in planning for various policy initiatives and for more extensive data collections, and refinements in guidance and technical assistance to States and local areas. These continuing needs warrant the continued possibility of rapidly obtaining information through surveys conducted under this clearance. _____

3. *Describe whether, and to what extent, the collection of information involves 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.*

Consistent with the quick-turnaround basis underlying this information collection request, surveys will be administered primarily through the Internet, with back-up use of the telephone and mail for increasing response rates in a limited number of instances. The use of Internet-based surveys will also reduce respondent burden and increasing the efficiency of data collection and processing.

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.*

This information collection request would allow for 15-day reviews of short surveys, a combination which is not otherwise available. Short surveys can be proposed and reviewed under a conventional clearance process, but the time frame for obtaining such information may extend many months, and sometimes up to a year, to obtain clearance. These delays can sometimes jeopardize the ability to develop policy, guidance, or technical assistance. Data collection efforts, including case studies or longer range, more detailed surveys studies, either

cover only a limited number of sites or take many years for data to be gathered and analyzed. Administrative data, while helpful, is often too limited, and cannot provide some of the details needed on key operational practices and issues. Thus, ETA has no alternative mechanism for collecting information that both identifies the scope or magnitude of emerging issues in its programs and provides the information on a quick-turnaround basis.

ETA will make every effort to coordinate the quick-turnaround surveys with other studies. ETA will make sure there will be properly drawn samples of local sites but will avoid, where possible local areas that have already been previously contacted in other studies. ETA will also make efforts to ease the burden on the universe of state level respondents and will make sure that interim data and information from each study will be shared and used to inform the other studies. The proposed quick turnaround surveys will provide “just-in-time” information that responds to specific issues that arise and will supplement and complement but not duplicate other ETA or CEO evaluation efforts and program reporting requirements.

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

The collection of information has no impact on small businesses or other small entities.

6. *Describe the consequences 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 in reducing burden.*

Without the information it will collect through the proposed surveys, ETA will be less effective in carrying out its oversight, technical assistance, and research functions and potentially informing the legislative, regulatory, or policy development process. These functions depend on ETA’s staying abreast of emerging challenges or impediments in its various programs. Only with such information can it effectively issue policy guidance or clarifications, and redress technical assistance needs that states, local areas, or other entities may have.

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.*

- * 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.*

There are no special circumstances that would cause this information collection to be conducted in any manner listed above. DOL may issue surveys more frequently than quarterly, but each survey will focus on separate issues and be administered to different respondents. This collection of information complies with the requirements of 5 CFR 1320.5.

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.

The public was given sixty days to comment on this information collection request by way of a *Federal Register* Notice, (85 FR 3721), published on January 22, 2020. Three comments were received. Two of these comments were from researchers who were supportive of the concept of multiple short surveys being conducted by ETA, while one commenter was critical of efforts to conduct the surveys as not being germane to the main mission of ETA. No actions were taken in response to these comments.

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

No payments or gifts to respondents will be made.

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

Persons to whom the questionnaires are distributed will be assured that their cooperation is entirely voluntary and that their responses will be kept private. Data collection will be carried out by DOL or its contractors and will be released to the public at large in aggregated form only, so that no specific state or local area agency will be identified. DOL or its contractors will

follow rigorous procedures for assuring and keeping data private. In keeping with this, access to any data with identifying information will be limited only to DOL and contractor staff directly working on the survey.

In keeping with the Confidential Information Protection and Statistical Efficiency Act of 2018, the following statement will be displayed on each questionnaire, when applicable:

“The Department Labor, its employees and agents, will use the information you provide for statistical purposes only and your response will not be disclosed in identifiable form without your informed consent, to the full extent permitted by law, in accordance with the Confidential Information Protection and Statistical Efficiency Act of 2018 (Title III of Public Law 115–435) and other applicable Federal laws.”

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 these 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.

None of the questionnaire items will involve sensitive content, such as the topics referenced in this question.

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.”*

This clearance package represents an umbrella clearance for 8-20 separate surveys to be conducted over a three-year period to a range of potential respondents, including (depending on the survey) state workforce agencies, local workforce development boards, American Job Center operators, Employment Service offices, and others. Although each survey conducted under this

clearance will be short, the exact number of questions will generally vary, within the range of approximately 10-30 questions per survey. In general, the total sample size will vary by survey averaging between 54 to 250 respondents for up to 20 surveys. Please note that while the high end estimate of 250 respondents is an average, it is expected that an occasional survey may exceed that upper limit.

Because of this variability in both the targeted number of respondents and questionnaire length, burden estimates for each survey will vary widely. As a way of bounding the estimates for this ICR, two scenarios are presented here.

The first scenario, representing a low estimate of burden, assumes a universe of all state workforce agencies. For surveys to be administered to state agencies, sampling will not be conducted; instead, all members of the universe will be surveyed. Doing so would yield 54 as the targeted sample, representing all 50 states, the District of Columbia, Puerto Rico, Guam, and the Virgin Islands. For the low estimate, we also assume that the survey will be one of the shorter ones envisioned under this clearance (with no more than 10 separate questions). We assume further that each question will take no more than 1 minute to answer, which we take to be ample if informed respondents are asked questions of a simple factual nature about state policy. These types of surveys will thus take 10 minutes per respondent; with 54 respondents, each survey would have a burden of 540 minutes or 9 hours. If 8 surveys used these low estimate assumptions, the total burden would be 72 hours over three years (or 24 hours averaged over each year).

The second scenario, representing the high estimate of burden, assumes that the maximum number of questions would be 30, and that the maximum amount of time for each question to be answered would be 3 minutes on average, assuming that some questions might require the respondent to either consult written documents (e.g., policy issuances) or consult with colleagues. In this case, each survey would take 90 minutes per respondent and with 250 respondents, would take 22,500 minutes or 375 hours. If all 20 surveys over the 3-year clearance period of this ICR used the assumptions for the high estimate, the total burden would be 7,500 hours (375 x 20). (The average annualized burden would be 2,500 hours.)

Using the two scenarios above, total respondent cost burden over the 3 years for 8-20 survey ranges from \$2,261.52 to \$235,575, as shown below:

Low Estimate:

54 respondents x 8 surveys x 10 minutes (10 questions @ 1 minute/question)/60 = 72 hours

72 hours x \$31.41 = \$2,261.52 over 3 years or \$753.84 annualized.

High Estimate:

250 respondents x 20 surveys x 90 minutes (30 questions @ 3 minutes/question)/60 = 7,500

7,500 hours x \$31.41 = \$235,575 over 3 years or \$78,525.00 annualized.

The \$31.41 per hour represents the median hourly wage based on the Bureau of Labor Statistics hourly and weekly earnings of “Community and Social Services Manager Occupations” (May 2018 National Industry-Specific Occupational and Wage Estimates, from the U.S Department of Labor, available at <https://www.bls.gov/oes/current/oes119151.htm> on the Department’s website).

Using the **high estimate** above the total burden is as follows:

Activity (for 3 years)	Number of Respondents (250 respondents for 20 surveys)	Frequency	Total Responses (30 responses for 5,000 respondents)	Time Per Response	Total Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time*
<i>Unduplicated Count for 20 Surveys**</i>	5,000	1	150,000	3 minutes	7,500	\$31.41	\$235,575

* “Community and Social Services Manager Occupations” (May 2018 National Industry-Specific Occupational and Wage Estimates, from the U.S Department of Labor, available at <https://www.bls.gov/oes/current/oes119151.htm>)

Please note: The average annual number of responses is approximately **1,667 and average annual burden hours are **2,500**.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

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*

The proposed information collection plan will not require the respondents to purchase equipment or services or to establish new data retrieval mechanisms.

(a) We do not expect any total capital and start-up costs.

(b) We do not expect extensive time spent on generating, maintaining, and disclosing or providing the information.

The proposed information collection plan will not require the respondents to purchase equipment or services or to establish new data retrieval mechanisms. These costs are not expected to vary.

We do not expect responding agencies to purchase equipment or services in order to respond to this information collection plan effort.

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.*

The Federal government's costs for this effort will derive from the contractors who will in most cases conduct the surveys. To compute these costs, we assume that data collection and analysis would cost between \$50,000 and \$100,000 based on estimates developed by DOL's contractors for recent surveys. These estimates take into account all expenses, including variable hours for different professionals (research director, analyst and writer, and interviewers), as well as equipment and overhead.

The cost of conducting 8 to 20 surveys would therefore range from \$400,000 to \$2.0 million over three years, or \$133,333 to \$666,667 in annualized costs. A detailed cost to the Federal government for each collection of data will be provided for in each survey.

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

There is no change in burden hour and responses requested or in the scope of the collection (which permits surveys related to the spectrum of agency programs).

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 end dates of the collection of information, completion of report, publication dates, and other actions.*

The surveys will be administered on an as-needed basis over the three-year period covered by this clearance. Results from the data collection will be presented through various means, such as a series of briefing papers, displaying tabular presentations of results, such as the number and percentage of states or local agencies who gave each of the various responses.

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 control number and expiration date will be displayed on any individual survey conducted under this clearance.

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.