

Justification for Non-Material Change to OMB 1290-0029

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. 1290-0029) for data collection for the implementation study of the Reemployment Services and Eligibility Assessment (RESEA) program. These changes are requested as a result of the COVID-19 pandemic.

Background

The Bipartisan Budget Act of 2018 (Public Law 115-123) amended the Social Security Act, creating a permanent authorization for the RESEA program, increasing funding, changing the program, and introducing new evidence and evaluation requirements. The U.S. Department of Labor's (DOL) Chief Evaluation Office funded an RESEA study that includes an implementation evaluation that will produce an up-to-date understanding of states' current RESEA programs and plans for program changes (RESEA programs are operated in about 50 states). DOL will use the results of the data collection and analysis effort to develop future guidance, design evaluation projects, and provide a range of technical assistance services to help states meet requirements of the new legislation.

When OMB approved this data collection in December 2019, the RESEA program plans the project anticipated collecting information about were related solely to the new legislation. However, the COVID-19 pandemic, beginning in March 2020, has created a major new event that may impact both the environment in which states are operating their RESEA programs as well as the design and delivery of the RESEA programs themselves.

The approved data collection includes three instruments: (1) semi-structured interviews with state Unemployment Insurance (UI)/RESEA program administrators, (2) semi-structured interviews with local workforce development board administrators and American Job Center administrators or staff, and (3) web-based survey instrument for state RESEA administrators.

Change Requests

DOL requests minor changes to the evaluation's data collection instruments to ensure the study is capturing how the COVID-19 pandemic might be affecting states' RESEA programs and the context in which their state's UI system and programs are operating. The requested changes include:

- Interview protocols:
 - o A small new section up front to learn about RESEA programs' current operational status and response to COVID-19.
 - o Minor questions throughout related to COVID-19.
 - o Minor adjustments to update the FY since this instrument was drafted.
- Survey:
 - o This instrument has added 7 items due to COVID-19.
 - o Minor edits to existing questions to reflect a range of anticipated potential new circumstances due to COVID-19 (e.g., virtual orientation, remote services).

Additionally, DOL's study plans to field the survey three times, instead of just once, which will enable the evaluation to capture states' plans before COVID-19 as well as at two points since the pandemic became more widespread. These requested changes result in extremely minimal changes to the burden estimates, however, based on the actual average burden per response observed during the survey's first fielding in February 2020 (40-45 minutes), which is much less than the initially approved burden estimate (2 hours). A revised burden table is included below.

As the data collection is currently underway, this evaluation is in a unique position to be able to learn about how states' programs, service delivery approaches, and contexts may be changing as a result of the COVID-19 pandemic. We hope to resume data collection with the updated instruments by the end of June so that we could provide DOL near real-time information about whether and how the states' RESEA programs and local contexts were affected by the COVID-19 pandemic.

Table A.1. Revised Annualized Burden Estimates for Data Collection Estimates

Data Collection Activity	Annual number of respondents	Number of responses per respondent	Total Number of Responses	Average burden per response (in Hours)	Annual estimated burden hours	Average hourly wage ^a	Annual monetized burden hours
Semi-structured in-person and telephone interviews with state UI/RESEA administrators	25	1	25	1.32	33	\$43.90	\$1,449
Semi-structured in-person interviews with local WDB administrators and AJC administrators/ staff	53	1	53	1	53	\$43.90	\$2,327
Web-based survey instrument for State RESEA administrators	17	3	52	0.75	38	\$43.90	\$1,668
Unduplicated Total (Annual)	95	--	129		124		\$5,444

Note: The updated burden estimate is based on the actual average time per response observed during the survey's first fielding in February 2020 (40-45 minutes). This is much less than the initially approved burden estimate (2 hours).

^a The hourly wage of \$43.90 is the May 2019 median wage across Management Occupations – Other Management Occupations (see http://www.bls.gov/oes/current/oes_nat.htm)