

**SUPPORTING STATEMENT A FOR
PERSONS WITH A DISABILITY: BARRIERS TO EMPLOYMENT, TYPES OF
ASSISTANCE, AND OTHER LABOR-RELATED ISSUES**

OMB CONTROL NO. 1220-0186

This ICR seeks to reinstate the Current Population Survey Disability Supplement.

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.

The purpose of this request for review is for the Bureau of Labor Statistics (BLS) to obtain clearance for the Disability Supplement to the Current Population Survey (CPS), scheduled to be conducted in July 2021. This supplement was last conducted with the July 2019 CPS. The proposed supplement questions are shown in Attachment A. As part of the CPS, the supplement will survey individuals ages 15 and over from a nationally representative sample of approximately 60,000 eligible U.S. households. The supplement will be sponsored by the Department of Labor's Chief Evaluation Office (CEO).

The results of this supplement will increase our understanding of the labor market challenges facing persons with a disability. The data are necessary for the Department of Labor and others in planning, funding, and evaluating policies and programs designed to help those with a disability.

The CPS has been the principal source of the official Government statistics on employment and unemployment for over 75 years. Collection of labor force data through the CPS helps BLS meet its mandate as set forth in Title 29, United States Code, Sections 1 through 9 (Attachment B).

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.

This supplement will gather information on employment of people with disabilities. Information will be collected about barriers to employment, prior work experience, and the use of available career and financial assistance for all people with disabilities. For employed people with disabilities, the survey will gather data on their level of difficulty completing work duties; whether they requested accommodations in the workplace and the nature of the accommodations;

modes of commuting; and whether they work at home, have flexible hours, or have temporary jobs. Since the supplement was last collected in 2019, work patterns have changed due to the coronavirus (COVID-19) pandemic. Having updated information will be valuable in determining how employment barriers have changed for people with disabilities.

Data gathered in this supplement will help measure the effectiveness of disability employment policies and assist policy makers in developing future policies that further the goals of the Americans with Disabilities Act (ADA) of 1990. The ADA established civil rights protections for individuals with disabilities similar to those provided to individuals on the basis of race, color, sex, national origin, age, and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, State and Local government services, and telecommunications. Executive Order 13548 and the U.S. Department of Labor's Add Us In initiative have reiterated a commitment to helping people with disabilities succeed in the workforce.

Because this supplement is part of the CPS, in which detailed demographic data are collected, estimates can be produced for a variety of subpopulations. Given sufficient sample size, comparisons will be possible across characteristics such as sex, age, and educational attainment.

Following is more detail on the subject areas for the proposed supplement and an explanation as to why the proposed data collection is important for policy development purposes.

A. Learn more about the low labor force participation rates for people with disabilities

Results will be used to target future policy development to important demographic audiences based on information relative to low labor force participation rates. For example, policy might need to be targeted to certain age, education, geographic, or other demographic characteristics.

B. Better understand the use and effectiveness of current programs designed to prepare people with disabilities for employment

The U.S. Department of Labor is interested in discerning the use and effectiveness of workforce development programs that prepare people with disabilities for employment. Results will be used to determine options for improving workforce development programs, such as enhancing the physical, programmatic, and communications accessibility of the workforce development system.

C. Learn more about the work history of people with disabilities

Current CPS data gives information on the work history of people with disabilities in the previous month. However, the CPS does not provide comprehensive data on an

individual's work history. Results will be used for improving workforce development programs that address issues of work history for people with disabilities.

D. Identify the different types of barriers to employment people with disabilities experience

It is widely recognized that people with disabilities experience barriers to employment. However, the CPS does not provide details about specific employment barriers experienced by people with disabilities. Results will be used to inform future policy development and pilot demonstration programs to address barriers to employment faced by people with disabilities.

E. Determine the types of workplace accommodations that assist people with disabilities; such accommodations include assistive technologies, transportation assistance, flexible work schedules, and alternative work arrangements

With appropriate accommodations, many people with disabilities are able to enter or reenter the workforce. Results will be used for improving workforce development programs by promoting a wide range of workplace accommodations and to inform future policy development and pilot demonstration programs to address barriers to employment faced by people with disabilities.

F. Measure the use of financial assistance programs among those with disabilities and whether these programs affect the likelihood of working

There are many financial assistance programs, such as SSI/SSDI, Medicare/Medicaid, TANF, and benefits counseling, that assist people with disabilities who are trying to enter or reenter the workforce. There is limited information about the effectiveness of these programs. Results will be used for improving workforce development programs by ensuring that these financial assistance programs are available to people with disabilities who access these centers.

BLS published a summary of the findings from the July 2019 collection in a news release issued in May 2020 (Attachment C).

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 Census Bureau, which conducts the actual collection of the CPS data (designing the sample, training and monitoring the interviewers, and conducting a continuing quality control program),

uses methods designed to keep respondent burden as low as possible. These interviewing methods, which include the use of computer-assisted interviewing, were improved as part of a complete redesign of the CPS implemented in January 1994. The redesign was preceded by years of wide-ranging discussions, research, and large-scale field tests aimed at long-range improvements in the survey.

The CPS and all of its supplements are collected 100 percent electronically by using Computer Assisted Telephone Interviews and Computer Assisted Personal Interviews (CATI/CAPI). With the collection of Basic CPS data for January 2007, an updated computer-assisted interviewing software, called Blaise, was introduced for running the data collection instrument. Blaise is a Windows-based survey processing system developed by Statistics Netherlands and licensed by Westat in the United States. The questions in the proposed disability supplement were designed to obtain the required information with minimal respondent burden.

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 A.2 above.

There are few data sources about the nature of labor market challenges facing people with disabilities. The American Community Survey (ACS) is a very large survey conducted by the Census Bureau that includes a set of 6 questions that were designed to identify whether a respondent has a disability. The 6 ACS disability questions are very similar to those contained in the monthly CPS that are used to identify respondents who have a disability. Because the survey is very large, the ACS provides meaningful data by state and many local areas. However, the ACS provides minimal information about the labor force attachment of those who are neither employed nor unemployed, and the ACS does not collect information about accommodations or participation in assistance programs. Moreover, the ACS provides only limited information on the work activities of those with disabilities; unlike the CPS, the ACS does not collect timely, detailed information on the employment status of the population.

The Survey of Income and Program Participation (SIPP) contains questions about the ability to perform a number of activities. If a person reports having a difficulty performing a specific activity, usually a follow-up question determines the severity of the difficulty. Responses to these and related questions are used to derive a measure of disability status. The SIPP data are able to provide some information about employment, recent work history, income, and participation in income assistance programs. However, the SIPP does not ask about accommodations.

The National Health Interview Survey (NHIS) included the CPS and ACS disability questions in 2017 along with basic questions to establish whether respondents were employed or unemployed; however, this survey does not collect other more detailed data about labor force activities, and therefore cannot address the lack of data concerning the large contingent of those with a disability who are not in the labor force.

CPS Disability Supplement
OMB Control Number 1220-0186
OMB Expiration Date: Reinstatement

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

The data are collected from households; their collection does not involve any small businesses or other small entities.

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 CPS Disability Supplement was last conducted in 2019, prior to the coronavirus (COVID-19) pandemic. Since the start of the pandemic, there has been a dearth of high quality data specifically about the nature of labor market challenges facing people with disabilities. This information—in combination with information collected in the monthly CPS, such as demographic characteristics and employment status—will help guide lawmakers to determine if new policies or regulations are needed to protect these and other types of workers. It will also provide data that can be used by the Department of Labor to help evaluate the effectiveness of their assistance efforts.

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 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 secret, 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. The CPS data are collected in a manner that is consistent with the guidelines in 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.

Federal Register Notice

No comments were received as a result of the Federal Register notice published in 86 FR 4129, on January 15, 2021.

The following people have been in consultation with BLS concerning the development of the survey:

Outside Consultation

Department of Labor
Christina Yancey
Chief Evaluation Officer
Office of the Assistant Secretary for Policy
Department of Labor
(202) 693-5910

Bureau of the Census

Kyra Linse
Associate Director Demographic Programs
Bureau of the Census
Department of Commerce
(301) 763-9280

In addition to the above, a statement soliciting comments for improving CPS data is prominently placed in all Census Bureau publications that cite CPS data. A similar statement is included in the technical documentation that accompanies the microdata files. Also the CPS advance letter (Attachment D) provides respondents with an address at the Census Bureau to which they can submit general comments on the survey, specifically those regarding respondent burden.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

The Census Bureau does not make any payments or provide any gifts to individuals participating in the CPS.

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

The Census Bureau will collect the supplemental data in compliance with the Privacy Act of 1974 and OMB Circular A-130. Each sample household will receive an advance letter (Attachment D) approximately one week before the start of the initial CPS interview. The letter includes the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Field representatives must ask each respondent if he/she received the advance letter and, if not, must provide a copy of the letter to each respondent and allow sufficient time for him/her to read the contents. Also, interviewers provide households with the pamphlet "The U.S. Census Bureau Respects Your Privacy and Protects Your Personal Information," which further states the confidentiality assurances associated with this data collection effort (Attachment E). All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9 (Attachment F). Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or substantial fine if he/she discloses any information given to him/her.

As is the case with data collection, data released to the public by BLS or Census in tabular form or as microdata files are released in compliance with Title 13. Tabular data released to the public are always in aggregated form. No tabulations that allow for the identification of individual respondents are made available to the public. Any microdata files that are released are public use files with all identifying information removed from the records.

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.

No sensitive questions are asked in this supplement.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **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. General 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.**
- **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 in Item 14.**

The estimated respondent burden for the July 2021 Disability Supplement is 8,833 hours. This is based on an average respondent burden of approximately 5 minutes for each of the approximately 106,000 individuals about whom data is collected in the supplement. About 55,000 respondents will supply the data for 106,000 individuals, themselves and others in their households. Generally, one respondent answers for the household. The actual respondent burden is dependent upon the size of the household and the characteristics of its occupants.

The overall annualized dollar cost to the respondents for collection of the supplement data is \$135,587. This estimate assumes a wage rate for all respondents of \$15.35 an hour, the median hourly earnings for workers paid by the hour in 2019.

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Disability Supplement	55,000	1.93	106,000	5 min	8,833	\$15.35	\$135,587

13. Provide an estimate of 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).

- a. Capital start-up costs: \$0
- b. Total operation and maintenance and purchase of services: \$0

There are no costs to survey respondents other than the time it takes to respond to the questionnaire. Respondents answer questions based on personal experience, which requires no record-keeping or other expenses.

14. Provide estimates of the annualized cost 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), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

The total estimated cost of the July 2021 supplement is approximately \$700,000. This cost is borne by the Chief Evaluation Office of the Department of Labor and largely represents the charge by the Census Bureau for conducting the supplement. Census activities for this supplement include programming the collection instrument, developing interviewer training materials, collecting and processing data, and creating a public use microdata file. Also included are costs for BLS staff to analyze the supplement data, prepare a news release, and publish estimates.

15. Explain the reasons for any program changes or adjustments.

This is a reinstatement of a previously approved collection. Response burden is estimated to be the same as it was in the July 2019 supplement.

16. For collections of information whose results will be published, outline plans for tabulations, 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.

The July 2021 CPS, of which this supplement is a part, will be conducted July 18-27, 2021. Processing of this supplement will commence in August 2021. Survey results will appear as a news release in 2022.

The news release will be published in electronic and paper formats. The electronic news release will be posted on the BLS webpage at www.bls.gov/cps. Additionally, the Census Bureau will release a public use version of the microdata after the publication of the news release.

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 Census Bureau does not wish to display the assigned expiration date of the information collection because the data collection instrument is automated and, therefore, the respondent would never see the date. The advance letter sent to households by the Census Bureau contains Census's OMB clearance number for the CPS and Census's version of the failure to comply notice (see Attachment D.) Copies of this advance letter are stockpiled by the Census Bureau for use as needed; changes to the letter would make the current inventory of letters unusable.

18. Explain each exception to the certification statement.

There are no exceptions to the certification.