

SUPPORTING STATEMENT FOR VETERANS SUPPLEMENT TO THE CURRENT POPULATION SURVEY

OMB CONTROL NO. 1220-0102

This ICR seeks OMB clearance for a revision of the Veterans Supplement to the Current Population Survey.

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 an extension with change for the Veterans Supplement to the Current Population Survey (CPS), which is conducted annually. The Veterans Supplement is co-sponsored by the U.S. Department of Veterans Affairs (VA) and the U.S. Department of Labor's Veterans' Employment and Training Service (VETS).

The collection of the Veterans Supplement in August 2019 was the twenty-second in a series of efforts to gather detailed data regarding location of military service, service-connected disability rating, Reserve or National Guard membership, and combat-zone veterans. The collection of these data is mandated by federal law under the Special Unemployment Study (Attachment C). The Veterans Supplement also collects data on participation in certain programs for veterans. The Veterans Supplement was first conducted in April 1985 and was repeated biennially until July 2010. Since July 2010, the supplement has been conducted annually, generally in August.

In order to make the information for the supplement more relevant, 24 new questions are proposed for addition starting with the 2021 Veterans Supplement. Added questions include items about veterans' transition from Active Duty to civilian employment, details about working with service-connected disabilities, awareness of VA benefits, and work duties while in the Armed forces. VA and VETS agreed that there was a dearth of information about these topics and that additional questions on the Veterans Supplement could help fill this data need. In determining what questions to add, VETS and VA convened a panel of subject matter experts from academia and veterans organizations to identify urgent data needs. In addition, many questions were revised; most of these changes were made to streamline or clarify language or to update questions to use more current terms. Proposed supplement questions, including the added questions, are shown in Attachment A. Note that the order of some questions that had been in the Veterans Supplement previously were changed, though the wording of these questions remained the same. This was done in order to make the supplement questionnaire easier for respondents to follow.

Ten questions were proposed for elimination and are shown in Attachment B. These questions were selected for elimination because the data from these items were rarely used by the sponsoring agencies, and their removal would help keep costs and respondent burden low. The questions proposed for removal include detailed questions about veterans' experiences with Transition Assistance Program workshops, strategies for obtaining employment, and whether veterans receive a monthly check from the VA for a service-connected disability.

As part of the CPS, the supplement will survey individuals ages 17 and over from a nationally representative sample of approximately eligible 60,000 U.S. households.

The CPS has been the principal source of official Government statistics on employment and unemployment since 1940. 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 D).

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 annual Veterans Supplement will provide information on the labor force status of veterans with service-connected disabilities; combat-zone veterans; past or present National Guard and Reserve members; recently discharged veterans; and Afghanistan, Iraq, and Vietnam veterans. The supplement will also provide data on veterans' participation in various employment and training programs. The proposed new questions include items about veterans' transition from Active Duty to civilian employment, details about working with service-connected disabilities, awareness of VA benefits, and work duties while in the Armed forces.

As in the past, these data will be used by the Veterans' Employment and Training Service (VETS) and the Department of Veterans Affairs (VA) to determine policies that better meet the needs of our Nation's veteran population. Of current concern is the scope of the problems of veterans as well as the effectiveness of veterans' benefit programs in meeting their needs. The proposed new questions will provide information to assist VA and VETS in developing programs and policies that smooth veterans' transition into civilian employment, including for veterans with service-connected disabilities (see Attachment A). The CPS demographic and labor force data provide a comprehensive picture that is invaluable in planning Federal programs and formulating policy. Legislation is regularly proposed in Congress concerning veterans; these proposals often use BLS data. Veteran service organizations, as well as academic researchers, use the data to analyze the employment status of various groups of veterans. It is expected that approximately 7,100 eligible veterans will participate in the survey.

BLS published a summary of the findings from the August 2019 collection in a press release issued in March 2020 (see attachment E.)

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 collects the CPS data, including designing the sample, conducting the interviews, training and monitoring the interviewers, and maintaining a quality control program. These efforts by the Census Bureau keep respondent burden as low as possible.

The CPS and all of its supplements, including the Veterans Supplement, are collected 100 percent electronically by using Computer Assisted Telephone Interviews and Computer Assisted Personal Interviews (CATI/CAPI). The data collection instrument is programmed in Blaise, a Windows-based survey processing system developed by Statistics Netherlands and licensed by Westat in the United States. The questions in the Veterans 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.

Several independent surveys have contained selected veteran items. No current data source is available, however, that provides the depth and scope of information on the number, demographic characteristics, and labor force characteristics of veterans who have a service-connected disability; combat-zone veterans; National Guard and Reserve members; recently discharged veterans; and veterans who have served in Afghanistan, Iraq, or Vietnam that this supplement provides. Also, there are no federal data sources that provide nationally representative information on veterans' transition into civilian employment, or on the challenges faced by veterans with service-connected disabilities.

The Survey of Income and Program Participation (SIPP) panel obtains data on service-connected disabilities of all persons 15 years of age and older who were identified as veterans. The SIPP has a small sample size relative to the CPS. Also, the data from the CPS Veterans Supplement are available much earlier than the data from SIPP.

The Annual Social and Economic Supplement (ASEC) to the CPS includes a question that is used to determine the number of persons who received veterans' disability income for a service-connected disability during the previous calendar year. However, the service-connected disability rating is not collected. Thus, labor force estimates tabulated by disability rating cannot be provided from ASEC data. Neither does the ASEC provide data on recently discharged veterans, combat-zone veterans, or the number of veterans who have used various programs. The ASEC also collects no information about veterans' transition from Active Duty to civilian employment, details about working with service-connected disabilities, awareness of VA benefits, and work duties while in the Armed forces. Finally, a critical advantage of the Veterans Supplement over the ASEC is that responses to the Supplement items are more often self-response, rather than proxy-response, which reduces misreporting. Approximately 80 percent of responses to the Veterans Supplement are self-responses.

The American Community Survey (ACS), conducted each month by the Census Bureau, includes three questions about veterans. The first determines if the respondent is a veteran, the second notes period of service, the third asks if the person has a service-connected disability, and if so, asks for the disability rating. Unlike the CPS Veterans Supplement, the ACS does not ask additional questions to determine if the veteran was called to active duty as a result of a call-up from the Reserve or National Guard; served in a combat or war zone; has a service-connected disability that keeps the veteran from getting or holding a job; or if the veteran had served in Afghanistan, Iraq, or Vietnam. Also, the CPS Veterans Supplement is conducted together with the basic CPS questions about labor force status. As a result, the BLS can tabulate employment and unemployment data about veterans and nonveterans in a method consistent with that used to calculate the national unemployment rate of persons 16 and over as published in the Employment Situation news release. Also, CPS data are available earlier than data from the ACS, and there is a longer historical series.

The Veteran Employment Outcomes (VEO) are experimental data that show labor market outcomes for recently discharged Army veterans. However, these data, which are obtained by matching service member information with a national database on jobs, are limited to Army veterans. They also do not cover the same information proposed for collection in the new Veterans Supplement questions on transition to civilian employment, such as when veterans first applied for a civilian job, whether they sought additional education prior to transitioning to civilian employment, or whether they wanted a job that used their specialized military training.

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.

These data will provide insight into veterans with service-connected disabilities; combat-zone veterans; past or present Reserve or National Guard members; recently discharged veterans; and Afghanistan, Iraq, and Vietnam veterans. Data from the proposed new questions will provide information about veterans' transition from Active Duty to civilian employment and whether their military work duties help in their transition. The new questions about how disabilities impact work will help inform policies and programs for veterans with service-connected disabilities. Awareness of VA benefits and how veterans would prefer to learn about them will help the VA and VETS develop communication strategies with veterans. Without the collection, there would not be sufficient information for the VETS and VA to plan and develop effective programs and policies for our Nation's veteran population.

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.

- a. One comment was received as a result of the Federal Register notice published in 86 FR 7574.

The comment, which was e-mailed to BLS on January 29, 2021, was out of scope. The mission of the BLS is to measure labor market activity, working conditions, price changes, and productivity in the U.S. economy to support public and private decision making. This particular information collection aims to assist the VA and VETS that co-sponsor this supplement in determining policies that better meet the needs of our Nation's veteran population.

- b. The following people have been in continuous consultation concerning the development of the survey:

Veterans' Employment and Training Service (VETS)
John Lowry
Assistant Secretary
Veterans' Employment and Training Service
Department of Labor
202) 693-4700

Department of Veterans Affairs (VA)
Melissa Chiu
Director for Veterans Analysis Statistics
Department of Veterans Affairs
(202) 461-5901

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. Finally, the advance letter (Attachment F) 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 F) 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 CPS, 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. (This assumes that interviewers are able to do in-person interviews; due to the COVID-19 pandemic, some in-person interviewing has been curtailed in recent months in some areas of the country.)

Also, interviewers provide households with the pamphlet “How the Census Bureau Keeps Your Information Confidential,” which further states the confidentiality assurances associated with this data collection effort and the Census Bureau's past performance in assuring confidentiality (Attachment G). (Likewise, this assumes that the pandemic does not prevent an in-person interview.)

All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9 (Attachment H). Anyone authorized to access respondent information has taken an oath to that effect and is subject to a jail penalty and/or substantial fine if he/she discloses any confidential respondent information.

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 annual Veterans Supplement is 503 hours. This is based on an average respondent burden of approximately 4.25 minutes for the 7,100 veterans eligible for the supplement in 2021. In the annual supplement, Gulf War-era veterans have a longer interview than veterans of other service periods. The actual respondent burden for each veteran is dependent upon the characteristics of their service and programs they participate in.

The overall annualized dollar cost to the respondents for collection of the August 2021, August 2022, and August 2023 supplement data is \$7,721 per year. 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 |
|-------------------------|---------------------------|--|------------------------|-------------------------------|-----------------------------|-------------------------|--------------------------|
| CPS Veterans Supplement | 7,100 | 1 | 7,100 | 4.25/60 | 503 | \$15.35 | \$7,721 |

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).

- **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 service 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 collection 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.**

a. Capital start-up costs: \$0

b. Total operation and maintenance and purchase of services: \$0

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 August 2021 supplement is \$700,000. This cost is to be borne by VETS and VA and largely represents the charge by the Census Bureau for conducting the Veterans Supplement. Census activities for this supplement include programming the questionnaire, developing interviewer training materials, collecting data, processing survey microdata, and developing public use files. The \$700,000 also includes costs for the BLS staff to prepare a news release and publish estimates, as well as administer the interagency agreement.

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

Based on the previous supplement, the total number of respondents has decreased due to a decrease in the number of veterans in the U.S. population. Some questions were added to the supplement, which is anticipated to lengthen the time it takes to conduct the supplement by 1 minute.

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.

In 2021, 2022, and 2023, the supplement is expected to be collected in August beginning the week containing the 19th of the month. Processing of this supplement will begin the month following each supplement. Survey results will appear first as a BLS news release during the calendar year following the supplement.

These news releases 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 from which all personally identifying information has been removed 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 instrument is automated and the respondent, therefore, would never see the date. The advance letter sent to households by the Census Bureau contains Census' OMB clearance number for the CPS and Census' version of the failure to comply notice (see attachment F.) 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.