SUPPORTING STATEMENT FOR Employment Navigator Data Collection and Matching

OMB CONTROL NO. 1293-TBD

This ICR seeks to obtain approval for a new information collection request from transitioning service members and recently separated veterans. The purpose for the data collection will be to measure the effectiveness of Employment Navigators, who will be placed on select military bases in order to assist service members in effectively transitioning into the civilian labor force.

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 Department of Labor (DOL) is tasked to "establish and maintain a program to furnish counseling, assistance in identifying employment and training opportunities, help in obtaining such employment and training, and other related information and services to members of the armed forces under the jurisdiction of the Secretary concerned who are being separated from active duty and the spouses of such members" under 10 U.S.C. § 1144. As part of the Transition Assistance Program (TAP), DOL proposes to place job assistance counselors (Employment Navigators) on select military bases to assist transitioning service members move into the civilian labor force. Employment Navigators will assist transitioning service members to get placed on a best-fit pathway for his/her desired career. In order to create return on investment metrics, data must be collected on the services provided by Employment Navigators, and employment-based outcomes that follow. Data is expected to be collected directly from Employment Navigators assisting transitioning service members, as well as any DOL-approved service partners who also provided job-assistance services to the service members.

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 purpose of the proposed information collection is to provide transitioning service members and recently separated veterans assistance in finding the best-fit career as quickly as possible. The data collection will allow Employment Navigators and partners to capture necessary information for DOL to conduct employment outcome analysis. The outcome analysis will be conducted by DOL employees to measure the impact of Employment Navigators, and gauge the feasibility to continue the program beyond the pilot phase. It is anticipated that data gathered from this proposed collection will then be merged with the National Directory of New Hires for employment and wage analysis. The data collected here will allow for various cross-tabulations to be created, which then may lead to the most potent mix of services or highlight high-producing partners.

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.

100% of the responses to the Employment Navigator data collection will be through an electronic/cloud-based case management system. Data will be collected verbally from the participant and entered into the system by Employment Navigator or approved Transition Assistance Program (TAP) partner staff, reducing the amount of burden on the participants. To reduce burden and redundancy, TAP Partners will also have access to the proposed data collection system. Since both Employment Navigators and approved Partners will be able to access the electronic record, it will ensure that required data elements will only be collected once. Additionally, the electronic system will contain data validation to ensure 100 percent data accuracy for each field.

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.

Data collected will be primarily on the services provided by the Employment Navigator, which will be unique to the participant and non-duplicative. There will also be a few personal characteristic data elements collected; these few data elements exist in other Department of Defense data systems, but would require additional security development work which would exceed the burden costs of collecting those few variables again. As mentioned in item #3 above, multiple entities will share access to the electronic data system in order to reduce re-collection of data elements.

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

All participants will be active-duty service members and will have no burden impact on small businesses.

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.

As a pilot program, a lack of data collection would not allow DOL to calculate return-on-investment metrics for the program. DOL plans to examine the employment placement rate and total earnings as potential indicators of program success, but this data collection is required to be able to do that. If DOL intends to implement the Employment Navigator pilot into a full-time program, key performance indicators will be required.

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.**

This information collection request does not contain any special circumstances for respondents.

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 was published in the Federal Register on 7/29/2020. There was one public comment received during this time period. The comment recommended that DOL provide a written supporting statement and final versions of the three forms mentioned in the notice. All of these documents are being supplied as part of the 30-day notice.

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.

Consultations were held with various potential TAP partners to understand the recordkeeping and reporting requirements proposed. Feedback was positive, especially considering DOL VETS will provide an electronic cloud-based case management system for Employment Navigators and TAP partners for data entry. Additionally, the proposed data collection was modeled after existing/approved methods used by other DOL agencies within the workforce network.

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.

There are no special circumstances to prohibit consultation on this information collection request at least every three years.

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

Respondents will not receive any type of gifts or payments. Participation in the Employment Navigator program is voluntary.

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

Respondents will be assured that information provided is on a voluntary basis, and that any personal information will be used only to determine the socioeconomic impact of the program. Participants will be asked to sign a data disclosure form which includes safeguards put in place by DOL to protect sensitive data, as well as permission to use personal information only for the purposes of employment outcome matching and aggregation.

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.

Private or sensitive questions will not be asked of respondents.

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. 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.**

- **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 burden estimate for this proposal is contained in the table below. The burden is displayed for each major component in three main areas of data collection. The majority of the burden is assumed under the Employment Navigator intake form. At this stage, Employment Navigators will collect demographic information, data regarding post-separation preferences, and services provided or offered. It is estimated that this intake process will take 20 minutes per respondent.

The second stage of data collections occurs after a participant is referred to an approved TAP partner entity to receive the recommended services such as direct job placement, mentorship, or networking. At this point, the TAP partner will provide DOL with additional information on the services provided. It is estimated that TAP partners will spend approximately 15 minutes per participant entering the additional data. It should also be noted that it is estimated that approximately half of the total participants will be referred to non-American Job Center (AJC) partners where this additional data collection will occur. AJCs will not enter the additional information requested; instead, AJCs will enter data as prescribed in the Participant Individual Record Layout (form ETA-9172), which is approved under OMB Control No. 1205-0521.

The last form included in the overall burden estimate is the application to become a verified TAP partner. This will be a standardized form that any entity will complete and submit to DOL for review. It is estimated that this form will take 12 minutes to complete.

Table 1: 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
Employment Navigator Intake Form	15,000	1	15,000	.33	5,000	$29.69	$148,450
TAP Partner Data Entry Form	7,500	1	7,500	.25	1,875	$29.69	$55,669
TAP Partner Registration Form	50	1	50	.20	10	$30.25	$303
TOTAL	22,500	1	22,500		6,885	$29.88	$204,422

**Note: Hourly cost for $29.69 based on Bureau of Labor Statistics (BLS) Occupational Employment and Wages, May 2019, 21-1029 'Social Workers, Other' mean hourly wages. Hourly rate of $30.25 for Partner System Registration based on BLS Occupational Employment and Wages, May 2019, 43-6011, 'Executive Secretaries and Executive Administrative Assistants' mean hourly wages.*

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.**

There is no expected start-up or maintenance cost to the respondents or recordkeepers. A cloud-based case management/data entry system will be provided by the Federal Government, and is discussed in more detail in section 14. License costs associated with access to the system will also be paid for by DOL.

There is also no expected burden associated with services provide to participants since these services are already being provided under normal business models. DOL is simply providing additional referrals to each partner based on the partner's willingness to receive additional participants.

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.

Start-up costs incurred by the federal government include: $2.5M for initial case management development and implementation; $500,000 annually thereafter for system maintenance and licensing; $50,000 annually for costs associated with data matching to the National Directory of New Hires; $500,000 annually for contractor analytical support (based on $250,000 per year for a Senior Data Analyst). This cost estimation was based on similar case managements systems developed by DOL in the recent past.

The aforementioned case management system will likely be a commercial off-the-shelf product customized for use by Employment Navigators, approved TAP partners, and DOL employees. The system will be cloud-based and available to all users wherever internet access is available. Respondents will not bear a direct cost to utilize the system.

In addition to the equipment and contractor costs mentioned above, it is estimated that DOL will bear the cost of approximately $40,000, which is based on half of a full-time government employee. This cost comes from the need to guide contract staff, engage in data analysis, and brief senior leadership on performance outcomes of the pilot. The table below includes an itemized list of cost categories for the first year of pilot operation and future years.

Table 2: Itemized Cost Categories for Employment Navigator Pilot

Cost Category	First Year of Pilot	Future Years
Public Data Collection	$204,422	$204,422
Public Equipment & System Maintenance	$0	$0
Case Management System Development	$2,500,000	N/A
Case Management System Maintenance	N/A	$500,000
Data Matching Fees, Federal Employees, Contractor Support	$590,000	$590,000
TOTAL[1]	**$3,294,422**	**$1,294,422**

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

As a pilot program, this project will help to establish permanent program policies. There will be no changes at this time to the original program due to this information collection.

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.

Report publication from this information collection is unlikely. However, aggregated results will likely be shared with interested stakeholders, such as: Congress, the Department of Defense and all military branches, and the Department of Veterans' Affairs.

Any information obtained from this information collection will be distributed in an aggregated form that makes it impossible to identify one specific record/participant. It is anticipated that information will be calculated to create the key performance indicators of: employment placement; employment retention; and quarterly or annual earnings. These performance indicators will be displayed in cross-tabular tables or visualizations which display these results by: military occupational specialty; rank; military branch; military installation; services received by an Employment Navigator; educational attainment; receipt of a "warm handover" from DoD; and possibly others as data trends emerge. It is not expected for advanced statistical methods to be necessary to produce these performance indicators. No sampling methodology will be needed.

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.

Not applicable.

[1] A three-year average cost will be used for the Annual Cost to Federal Government within the ROCIS ICR (($3,294,422 + $1,294,422 + $1,294,422) ÷ 3 = $1,961,089.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATON EMPLOYING STATISTICAL METHODS.

Not applicable