

SUPPORTING STATEMENT – PART A

Understanding Employer Experiences Under Continuing Reserve Component Operations – 0704-XXXX

1. Need for the Information Collection

In accordance with 10 United States Code, Section 2358, the Under Secretary of Defense for Personnel and Readiness (USD[P&R]) is required to conduct research of interest to the Department of Defense (DoD). This research of interest to DoD requires the collection and dissemination of information from employers about their views on employing members of the National Guard and Reserve (G&R). DoD is requesting approval from the Office of Management and Budget (OMB) to conduct a survey of private-sector businesses, non-DoD federal agencies, and state and local governments designed to elicit these views. Additionally, DoD is requesting approval from OMB to conduct interviews with businesses in these same categories.

As the G&R has evolved to become both an operational and strategic reserve force, concerns have periodically arisen about challenges facing civilian employers of G&R personnel—especially those stemming from service-related absences from work—that may lead to frustration and possibly a reluctance to hire, promote, and retain these personnel. The Secretary of Defense recommended to the Deputy Under Secretary of Defense for Personnel and Readiness, through the Reserve Forces Policy Board, that DoD update and extend a 2013 RAND study¹ to document current views of employers and re-evaluate current DoD policy, federal legislation, and state legislation protecting National Guard service under state orders.

The two information collection activities included in this request, the survey of civilian employers of G&R personnel and interviews these employers, are part of a larger study that has six objectives, as follows:

1. Improve DoD's understanding of the challenges and rewards associated with civilian employers (public and private, and of varying sizes) employing actively-serving G&R personnel
2. Assess changes in the level of employer support for G&R civilian employment since the 2011 DoD National Survey of Employers and the 2013 RAND study that featured analysis of that survey and other data sources
3. Assess the level of employer support for current readiness and training requirements and operational uses of the G&R (short duration, more frequent absences associated with normal training and readiness requirements, and longer-term absences associated with long-term orders and current mobilization-to-dwell rotations)
4. Identify specific friction points for high-stress military career fields and civilian career fields and industries
5. Determine if there is a need to incentivize G&R employers, address concerns related to the Uniformed Services Employment and Reemployment Rights Act (USERRA), or pursue legislative changes that may better support the G&R and their employers as DoD continues to utilize the G&R as an operational force

6. Offer recommendations regarding G&R operational practices and policies (e.g., G&R utilization rates, mobilization-to-dwell policies, method of employer notification and timelines) and future studies.

This information collection is needed because the nature of G&R service has evolved greatly since DoD last obtained feedback from civilian employers a decade ago. The results of this study will enable DoD to address the rewards and challenges of civilian employment as perceived by G&R members and their employers, thereby sustaining and promoting the health of the G&R force consistent with the Prioritize Preparedness for War (1.1) and Talent Management (1.6.2) priorities of the Fiscal Year 2018 National Defense Strategy. The employer survey and interviews, in particular, will provide needed data on employer perspectives on the level of employer support and possible friction points. This information will enable DoD to efficiently target employer support efforts to ensure that civilian employers remain willing to employ G&R personnel and that G&R personnel are able to balance their military and civilian careers. If G&R personnel are forced to choose between their military and civilian careers, this could threaten G&R retention and military readiness.

2. Use of the Information

In order to learn the views of civilian employers of G&R personnel, RAND working in collaboration with its selected survey vendor, NORC, will administer a web-based survey to representatives of private-sector businesses and public-sector organizations. The universe of possible respondents is the set of all private U.S. firms and federal, state and local government agencies, with a focus on those currently or recently employing G&R members. Employers will be stratified by sector (federal government, state government, local government, and private sector) and size (number of employees). The primary analytical goal is to derive unbiased estimates that are representative of the population of firms employing G&R members within each stratum.

Large private U.S. firms (500 or more employees) will be randomly selected from the Dun & Bradstreet Hoovers database. A portion of the medium-sized private firm sample (100-499 employees) will be selected in the same way, while another portion of that sample will be identified by merging various available military data sources that consist primarily if not exclusively of G&R employers onto the Dun & Bradstreet database and selecting a convenience sample. Small firms (fewer than 100 employees) will be selected purely from military data sources to focus our outreach on firms known to have employed G&R personnel. To ensure sufficient representation of very small businesses, we will deliberately select a portion of the small private firm sample from among those firms that have fewer than 50 employees and another portion from the set of firms that have between 50 and 99 employees.

Within the federal portion of the public sector, a firm will be defined by the “Level 1” sub-agency codes used for stratification purposes for the Office of Personnel Management’s Federal Employee Viewpoint Survey (FEVS). RAND will survey the entire universe of “Level 1” sub-agencies. Note that a portion of these sub-agencies are in the Department of Defense (including the military services); while they contribute to the federal sample for analysis purposes, approval to survey those organizations is being sought through DoD’s Report Control Symbol (RCS)

licensing process and they are not included in burden tabulations in this request. At the state level, RAND will survey a central point of contact for each state (e.g., an HR director). RAND will also survey a central point of contact for agencies corresponding to each of the following four state-level government functions: corrections, judicial and legal, financial administration, and police protection. At the local government level, RAND will conduct a random sample of large general-purpose governments (estimated 500+ employees) drawn from the 2017 Census of Governments and pair this random sample with a convenience sample drawn from military data sources of local governments of all sizes with a signal of employing G&R personnel.

For all strata, mail and email contact information for a human resources representative or other appropriate survey respondent will be retrieved from the Dun & Bradstreet database when available and supplemented as needed using a commercial email append service. Where email contact information is not available, outreach will be conducted by mail only.

Via the survey vendor, NORC, RAND will mail a hard copy invitation letter to all firms invited to participate. The invitation package will include a cover letter from the Department of Defense, which will highlight the importance of the survey to the Department and how it will be used to inform policymaking to the benefit of employers and current or potential G&R employees. The package also will include an invitation letter from RAND supplying the respondent with the web link to the online survey and a unique PIN they will use to access the survey, along with a fact sheet describing the content of the survey, providing assurances about confidentiality, and indicating that respondents will be able to print out a certificate of participation upon completing the survey. The vendor will send the same materials electronically to firms for which email contact information can be obtained. Follow-up to non-respondents will include one mailed postcard to firms for which email contact information is unavailable and up to three additional emails to firms for which emails are available.

Survey respondents will complete the survey by web, though they may request that the survey firm email or fax a PDF version of the questionnaire to them so that they may review the survey in full in advance of completing it online. The survey includes questions on the organization's experiences hiring and employing G&R members, with a particular focus on challenges that may arise in the context of employee absences for military duties. The survey also includes questions soliciting views on the policy environment facing employers of G&R personnel including USERRA. There are several background questions related to characteristics of the employer organization, e.g., number of employees. The survey collects information about the experiences of the employing organization not the individual, and no identifiable demographic information about individual respondents will be collected.

Survey responses will be collected on a site hosted by the survey vendor. The survey vendor will create survey response data files and send interim and final files to RAND for analysis. These data will be encrypted and provided to RAND by the survey vendor via secure FTP. Within one week of sending RAND the final survey file and RAND confirming that includes all the required information, the survey vendor will destroy the data files containing respondent data.

The data RAND collects via the survey vendor will be used to provide descriptive information about the experiences and views of employers with respect to employing G&R members as civilians. Findings will be presented in a final report. Findings will reflect aggregate information and will not reveal identifiable information about specific employers or G&R members. Results

will be shared publicly after review and approval by the appropriate DoD offices. Findings will inform leadership of the experiences and opinions of G&R personnel and used in a review of G&R policies and programs and could be used to change the strategic communications with and outreach to civilian employers.

In addition to the survey, RAND will conduct interviews with representatives from organizations from the private sector and public sector that either currently employ or recently employed G&R members. The interviews will provide an opportunity for more in-depth exploration of key issues and trends that have emerged, and will yield rich, qualitative information to complement the quantitative insights gleaned from the survey. RAND will ask about the organization's experiences with G&R employees and duty-related absences; the impact of duty-related absences on the organization; USERRA; ESGR programs and support; and recommendations for possible ways to better support civilian employers of G&R members.

Given the small size of the National Guard and Reserve relative to the entire U.S. labor force, employing a guard or reserve member is a relatively rare event. Recognizing the challenge this poses to identifying suitable candidates for these in-depth interviews, RAND plans to select organizations for interviews from lists of organizations that either received an award from DoD publicly recognizing them as an exemplary employer of G&R personnel (e.g., a Patriot Award or Freedom Award) or submitted an inquiry to the ESGR support center via a telephone call or the ESGR website. Restricting the sample to organizations with recent, documented evidence of having employed G&R personnel increases the likelihood that prospective interviewees at those organizations will find the prospect of an interview interesting and relevant to them.

RAND will obtain, when possible, names and email contact information for appropriate respondents at each firm, to improve the targeting of the survey to those best-positioned to respond. RAND will send initial recruitment materials via U.S. mail. These materials will include a cover letter from DoD underscoring the value of the research to DoD, an invitation letter from RAND, and a fact sheet describing the interviews. This package will inform prospective interviewees that they will be contacted soon by RAND to schedule an interview. It also will include the RAND project leader's business card, so that prospective interviewees may contact us with any questions RAND will then contact prospective interviewees by email (when available) or by phone (if email unavailable or RAND does not receive a response within a week to the email). Interviews will be scheduled within a few weeks of this outreach. RAND will send reminder emails and/or make reminder phone calls, in the days leading up to the interviews. The interviews themselves are expected to last about 45 minutes. No follow-ups are planned.

The RAND project team will take notes during interviews and store these notes in electronic form on a secure RAND-based SharePoint site. Telephone interview data also will be recorded and captured as digital audio files (e.g., .mp3, .wav). These audio files may later be transmitted to Keystrokes, a transcription company based in Santa Monica, CA for transcription. If so, the audio files would be transmitted between RAND and Keystrokes via secure FTP (Kiteworks). De-identified transcribed audio files would also be transmitted between RAND and Keystrokes via secure FTP, and the de-identified transcribed files would be transmitted between RAND project team members using a secure RAND-based SharePoint site. The interview data will be analyzed using qualitative methods designed to identify notable themes and patterns, and findings will be included in the final report.

3. Use of Information Technology

All survey responses will be collected electronically. The survey will utilize a web-based instrument for data collection. The web-survey will be formatted to be easy to read and navigate and will be accessible across multiple devices and interfaces. In addition, the survey vendor will use a case management system (CMS) to facilitate efficient case tracking, as well as reporting on meaningful project metrics, such as the number of break-offs, non-responders, and hours per case.

All interviews will be conducted by phone.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. While the 2011 DoD National Survey of Employers and interviews conducted for the 2013 RAND study that featured analysis of that survey and other data sources asked a subset of the questions we plan to include in this information collection, the nature of G&R service has evolved greatly since DoD last obtained feedback from civilian employers about a decade ago. Moreover, in order to avoid an excessive burden on individual employers, RAND will not duplicate firms across the two prongs of the data collection (i.e., firms will not be included in both the survey and interviews).

5. Burden on Small Businesses

Small businesses, which likely have few employees to spare, have great potential to benefit from the improvements that ESGR intends to make to its programs to be informed by this information collection, and DoD is very interested in gathering the perspectives of small businesses on the challenges they face in the event of a Guard or Reserve member's duty-related absence. To that end, the employer survey includes a small business stratum, and small businesses are among the employers that will be targeted for interviews.

The survey sampling approach is designed to reduce the collective burden on small businesses by not randomly sampling small businesses. Small businesses are less likely to employ G&R personnel, meaning that a random sampling approach would require surveying a large number of these businesses to yield a sufficient number of responses from small businesses that employ G&R members to support statistically reliable estimates. The approach instead entails building a convenience sample of small businesses drawing on military data sources, including lists of small businesses that either received an award from DoD publicly recognizing them as an exemplary employer of G&R personnel or submitted an inquiry to the ESGR support center via a telephone call or the ESGR website. Prospective respondents identified through these means may have more interest in participating in the data collection than the general population of small businesses.

The interview sample will not be stratified explicitly but will include small businesses—identified via military data sources—as well. Small businesses can be among the most difficult employer types to track through a general survey with restricted response options and therefore are the most important to explore through semi-structured interviews.

6. Less Frequent Collection

The employer survey and interviews will be a one-time data collection effort. The employer survey and interviews were last conducted about ten years ago. Much has changed since then in terms of the labor market and the nature of G&R service, and DoD would benefit from up-to-date information on the employer perspective. Collecting this information after the COVID-19 pandemic, moreover, provides a unique opportunity to gain insight into impacts on employers at a time when many Guard units in particular may be called upon to aid in vaccine distribution and related efforts. This information will enable DoD to efficiently target employer support efforts to ensure that civilian employers remain willing to employ G&R personnel and that G&R personnel are able to balance their military and civilian careers. Without this data collection, these analyses with the potential to inform policy improvements would not be possible.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Thursday, May 27, 2021. The 60-Day FRN citation is 86 FR 28585 FRN 28585.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Monday, August 9, 2021. The 30-Day FRN citation is 86 FR 43529 FRN 43529.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to survey respondents or focus group participants.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Within one week of sending RAND the final survey file and RAND confirming that it includes all the required information, the survey vendor will destroy the data files containing respondent data and provide written documentation that this has been done. If interviews are transcribed, interview audio files will be destroyed after interview transcripts are received and their accuracy verified by the RAND project team. Within two years of the completion of the project, all remaining survey and interview data from this information collection will be destroyed.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

Employer Survey

- a) Number of Respondents: 3,194
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 3194
- d) Response Time: 0.5 hours
- e) Respondent Burden Hours: 1,597 hours

Employer Interviews

- f) Number of Respondents: 90
- g) Number of Responses Per Respondent: 1
- h) Number of Total Annual Responses: 90
- i) Response Time: 0.75 hours
- j) Respondent Burden Hours: 67.5 hours

2) Total Submission Burden

- a) Total Number of Respondents: 3,284
- b) Total Number of Annual Responses: 3,284
- c) Total Respondent Burden Hours: 1,664.5 hours

a. Labor Cost of Respondent Burden

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

Employer Survey

- a) Number of Total Annual Responses: 3,194
- b) Response Time: 0.5 hours
- c) Respondent Hourly Wage: \$56.11
- d) Labor Burden per Response: \$28.10
- e) Total Labor Burden: \$89,607.67

Employer Interviews

- a) Number of Total Annual Responses: 90
- b) Response Time: 0.75 hours
- c) Respondent Hourly Wage: \$56.11
- d) Labor Burden per Response: \$42.08
- e) Total Labor Burden: \$3,787.43

2) Overall Labor Burden

- a) Total Number of Annual Responses: 3,284
- b) Total Labor Burden: \$93,395.10

Median hourly wage was derived from the Bureau of Labor and Statistics (BLS) May 2019 Occupational Employment and Wage Estimates. The rate used for the employer survey and interviews is the median hourly wage of Human Resources Managers (11-3121, \$56.11) (http://www.bls.gov/oes/current/oes_nat.htm).

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

OSD P&R is supporting this data collection and analysis of data as part of the contract with the RAND Corporation. The estimated cost for this work, including design, fieldwork, and analysis, will be \$1,325,600 over 36 months. This includes \$1,200,000 for the contract with RAND, \$2,400 allocated for DoD personnel to take part in the employer survey and \$120,000 to oversee the project.

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Employer Survey

- a) Number of Total Annual Responses: 3194
- b) Processing Time per Response:
- c) Hourly Wage of Worker(s) Processing Responses:
- d) Cost to Process Each Response:
- e) Total Cost to Process Responses:

Employer Interviews

- a) Number of Total Annual Responses: 90
 - b) Processing Time per Response:
 - c) Hourly Wage of Worker(s) Processing Responses:
 - d) Cost to Process Each Response:
 - e) Total Cost to Process Responses:
- 2) Overall Labor Burden to the Federal Government
- a) Total Number of Annual Responses: 3284
 - b) Total Labor Burden:

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
- a) Equipment: \$0
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$1,325,600
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$1,325,600

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

16. Publication of Results

Information collected from the survey of employers and employer interviews will be analyzed and included in a final report to be published by RAND after review and approval by the appropriate DoD offices. It is anticipated that the draft report will be complete approximately 10 months after OMB approval of the data collection. The results will be communicated and disseminated by RAND as soon as the draft report is completed via briefings, summaries of the findings, and copies of the final report when it is available.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.