

EARN Perspectives of Jobseekers with Disabilities: the Impact of Employer Messaging

OMB CONTROL NO. 1230-0NEW

OMB Expiration Date:

SUPPORTING STATEMENT FOR

EARN Perspectives of Jobseekers with Disabilities: the Impact of Employer Messaging

AGENCY: Office of Disability Employment Policy (ODEP), United States Department of Labor (DOL).

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This ICR seeks to obtain approval for a new data collection to support research on jobseekers with disabilities.

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 EARN Project is a collaborative effort led by the U.S. Department of Labor's Office of Disability Employment Policy (ODEP), which awarded funding to Cornell University for operating an employer-focused disability policy development and technical assistance center. The proposed work aligns with the EARN Center's stated purpose: "to increase the capacity of employers to recruit, hire, retain, and advance people with disabilities through the identification and dissemination of evidence-based policies and effective practices." The EARN Center uses a Rapid Cycle Research (RCR) strategy to ensure all work is based in sound research practices and systematically engages business intermediary organizations across all stages of work, from problem formulation and exploration to resource development and dissemination.

In Phase 1 of the EARN Rapid Cycle Research (RCR) project, we spoke with nine employers about their organization's approaches to online outreach to people with disabilities, the effectiveness of these approaches, and their information needs related to online outreach. Employers were then asked what their priority information needs were to help guide the focus of the RCR for Phase 2. Two issues came up which have not been previously addressed in existing research and worthy of further examination under the next phase of the EARN RCR process. These were:

1. Interest in how to increase self-identification in the recruitment process, and
2. Understanding why jobseekers with disabilities may choose to apply (or not) to an organization.

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In both cases, the employers expressed interest in hearing directly from employees with disabilities about what might influence these decisions. Building off research in the area of applicant reactions, we propose to query individuals with disabilities about their impressions of messaging from organizations, specifically related to career pages on the company website(s). This inquiry directly builds from the EARN related efforts in conducting a literature review on career pages, and a resulting report of a review of 40 Fortune 500 website company career pages. Employers made it clear that given limited resources, a strong case needs to be made for innovations in this online outreach, and if only a few things can be changed, they want to understand what will be most impactful in facilitating applicants with disabilities to apply for their positions and to identify as a person with a disability. We designed a questionnaire to address the following study objectives:

- To build understanding from an applicant's perspective of how employer messaging in the online outreach process impacts key outcomes related to recruiting people with disabilities;
- To provide information and resources informed by the perspectives of people with disabilities that will support organizations in improving messaging in cost-effective ways.

Little is known about how jobseekers with disabilities look for jobs and what they look for, especially with regards to what might make a company be more or less attractive for applicants with disabilities. This research will help identify what individuals with disabilities may look for in a company when considering to apply for a position (or deciding not to). This questionnaire will inform resource development for employers interested in increasing disability representation in their workforces.

We propose solicit responses to a questionnaire of jobseekers with disabilities. These participants would be recruited through several organizations with whom we have existing relationships. The questionnaire, informed by interviews/groups interviews with nine jobseekers with disabilities, will provide a much larger sample to gain a better perspective of the larger population of jobseekers with disabilities. The results will help inform resources designed to assist employers by identifying the most effective approaches to attract job applicants with disabilities.

Information collection instruments included in this package:

- EARN Online Outreach Questionnaire (actual version will be an online instrument)

Other items included in this package:

- Online Outreach Questionnaire promotion
- 60-Day FRN

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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.

Our findings will be used by the EARN project team to add the critical perspective of people with disabilities to the resources we are developing for employers related to effective online outreach to people with disabilities. These resources will be available on the EARN website and promoted throughout partnering networks of employer national and international professional associations (i.e., our business intermediary organizations).

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.

An online questionnaire will be used for data collection. Participants will be able to access the questionnaire through whatever manner of internet access the participants have available - smart phones, computers, or other internet connected devices such as a tablet computer. Location will depend on where the individual has access to the internet. We will use Qualtrics software for questionnaire data collection. This approach allow us to conduct an anonymous survey in a cost-effective way. The ability to do branching can ensure that respondents only answer questions relevant to them.

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 is no known data collection or research effort that is relevant to the specific questions we are addressing.

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

This effort is not expected to impact small businesses or similar entities, as targeted respondents will be current or recent jobseekers with disabilities, not business 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 information gathered from jobseekers with disabilities will serve as the foundation for well-designed resources to inform employers and help to improve their online efforts in attracting and recruiting employees with disabilities. Without the data collected in this proposed questionnaire, the resources designed to inform employers of the most effective online messaging will be less relevant and informative. This questionnaire is designed to only be fielded once to gather current experiences of jobseekers with disabilities.

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;

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- **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 relating to the general requirements cited in 5 CFR 1320.5. This request fully complies with 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.

The 60-Day *Federal Register* Notice was published on April 29, 2021, 86 FR 22711-22712, to allow for public comments. No public comments were received. A copy of this notice is included in this package.

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.

As noted previously, a literature search was performed looking for similar information and we found that there is no existing research focused on the topic. Cornell's Institutional Review Board reviewed

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EARN's proposal and determined the proposal to be "Exempt" from the need for undergoing the full IRB process, without any concerns about disclosure risk.

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.

We conducted limited interviews with nine jobseekers with disabilities to inform the development of the questionnaire.

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

Individuals who complete the survey will have a one in twenty chance to win a \$25 gift card. This will be sent via email after the the survey has been closed. Names and email addresses will be obtained strictly for the purposes of sending the randomly selected participants gift cards. After completing the questionnaire, participants will be redirected to another form to enter the drawing, so their contact information (names and e-mail addresses) will not be connected to responses in any way. Any instances where respondents self-report identifying information will be redacted from the records.

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

Informed consent will be obtained from all questionnaire participants via an Online Consent Statement, which has been approved by the Cornell University Institutional Review Board with no concerns expressed. PII from the questionnaire or related documents will not be stored by EARN. Respondents are informed that responses will be anonymous and that reporting of results will be in aggregate form only.

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.

N/A

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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 table below provides the number of respondents, frequency of response per respondents, and total number of responses for the questionnaire; as well as the total burden hours (50 hours) and the total burden cost (\$1000) for the data collection. The questionnaire is expected to take 15 minutes to complete. Annually, total burden will amount to 16.67 hours and \$333.33.

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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
Online Questionnaire	200	1	200	0.25	50	20	1000
Three-Year Annualized	66.67	1	66.67	0.25	16.67	20	333.33

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

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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.**

This is a one-time online questionnaire and there is no cost burden to respondents beyond the time described in Item 12 noted above.

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 expected annual cost to the Federal Government from this information collection is \$53,019, of which \$27,157 consists of fringe benefits, \$500 consists of participant compensation, and \$25,362 consists of indirect costs.

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

This is a new 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.

The questionnaire results will be summarized with descriptive statistics (means, frequencies, and cross tabulations). The qualitative results will be analysed using a content analysis to identify key themes from the responses. No complex analytical techniques are planned. The resulting data summaries will

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be presented in an internal report for ODEP (not publically shared), a brief summary and one or more implementation tools based on the results will be prepared for broader dissemination to employers.

Time schedule for project (dependent on PRA approval timeline)

Task	Planned Due Date
Program online Questionnaire	06/30/21
Test online Questionnaire	07/15/21
Obtain PRA approval (planned timeline)	08/01/21
Release Questionnaire and rollout recruitment communications with partners	08/01/21
Weekly follow up with partners (update on yield, reminders, etc.)	08/01/21-08/15/21
Close Questionnaire	08/22/21
Conduct analysis of responses, develop report for ODEP	09/15/21
Develop implementation tools based on findings	10/15/21

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 instrument will will display the OMB expiration date.

18. Explain each exception to the certification statement.

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for this collection.