

PART A: JUSTIFICATION

This a **new collection** request associated with the Research to Support the Partnership on Inclusive Apprenticeship project.

The Office of Disability Employment Policy (ODEP) of the U.S. Department of Labor (DOL) commissioned the Research to Support the Partnership on Inclusive Apprenticeship (PIA) contract to build the evidence on apprenticeship that is inclusive of people with disabilities and support the PIA initiative. The research contract includes developing a baseline of knowledge on inclusive apprenticeship, technical assistance on data and outcomes to measure progress and success in inclusive apprenticeship, and a formative process study of PIA, all of which are integrated with and inform each other. ODEP contracted with the Urban Institute to conduct the research.

This package requests clearance for three data collection instruments as part of the study:

1. Survey of PIA apprenticeship intermediary organizations (AIO), partners, and community of practice members.
2. Topic guide for site visit interviews with AIO program staff and partners.
3. Focus group guide for apprentices enrolled in inclusive apprenticeship programs.

DOL does not anticipate submitting additional ICRs for future data collection requests for this overall study.

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 DOL and industry have invested billions of dollars over the past decade to encourage, develop and expand industry-driven apprenticeship training nationwide. Much of the federal investment is through program grants and technical assistance. The breadth of apprenticeship investments has resulted in a diverse sectoral, geographic, and institutional mix of apprenticeship programs and projects. In 2016, DOL announced a final rule prohibiting discrimination based on disability status in registered apprenticeship programs. That rule went into effect in 2017 and requires employers to invite apprentices to self-identify as people with disabilities both before hiring and during the apprenticeship. This project seeks to build the evidence base on apprenticeship that is inclusive of people with disabilities in three ways: 1) careful review of existing evidence and information; 2) rigorous process study to understand the experiences of the PIA initiative; and 3) technical assistance on data and outcomes to measure progress and success in inclusive apprenticeship.

The PIA initiative is the largest federal investment in promoting inclusive apprenticeship and the primary focus of the research project. PIA collaborates with employers and

apprenticeship intermediary organizations (AIOs) to design inclusive apprenticeship programs that meet employer talent needs and enable people with disabilities to gain credentials and skills to succeed in growing industries.

Although the evidence base on apprenticeship in the U.S. is growing, there are still several key knowledge gaps that are ripe for rigorous evaluations and evidence-building. Policymakers, researchers, evaluators, and practitioners are generally persuaded that apprenticeship has positive net benefits, but more evidence is needed on what models and strategies are most appropriate for supporting and increasing the representation of people with disabilities in apprenticeship.

Data collection for the Research to Support the Partnership on Inclusive Apprenticeship project is necessary to understand the implementation of PIA and the models and strategies piloted by PIA that could be used to support apprentices with disability in other registered apprenticeship programs.

Citation of sections of laws that justify this information collection: The evaluation of PIA is a part of ODEP’s learning agenda under the Foundations for Evidence-Based Policymaking Act (5 U.S.C. 311)

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 data collected through the activities summarized in this request will be used to conduct a process study of the PIA to document all facets of the employer-apprentice lifecycle, including an understanding of the engagement between employers, apprenticeship intermediaries, and workforce systems; respondent perceptions on how to recruit, engage or incentivize employers to plan and implement inclusive apprenticeship programs, as well as connect with the workforce; identify perceived challenges and promising practices when engaging employers and implementing inclusive apprenticeship designs; identify and document perceived promising approaches on effective engagements and incentives with employers; identify and describe any observed promising practices in tracking and sharing information on inclusive apprenticeship enrollments, onboarding, and success; identify the business case for continued inclusive apprenticeship programs; and, inform other interested audiences, including DOL officials and staff, as well as other state and local agencies and other partners, about the findings from the project.

The study will address the following research questions:

1. What activities are PIA and its partners engaged in to expand inclusive apprenticeship opportunities?
2. What is currently known about program-level policies and practices for inclusive apprenticeships instituted by employers or AIOs that appear promising for promoting career pathways for people with disabilities?
3. What is known about the supports, services, and tools and technologies provided to individual apprentices that can be integrated in inclusive apprenticeship

- programs that assist in achieving sustained employment and retention for people with disabilities participating as apprentices?
4. What state and federal policies are perceived as promising to affect the rate and likelihood of people with disabilities participating in apprenticeship programs?
 5. What are federal agencies, particularly the Office of Apprenticeship but also other agencies involved in apprenticeship expansion, doing to promote greater inclusion for people with disabilities?
 6. What are industry associations and state and local government doing to promote policy and practices driving greater inclusion for people with disabilities in apprenticeship programs and sustained employment opportunities?
 7. What is the business value of operating an inclusive apprenticeship program for employers?
 8. What strategies for inclusive apprenticeship appear to improve labor market outcomes for persons with disabilities?
 9. What strategies for starting and promoting inclusive apprenticeship seem promising? What are the main obstacles to starting an inclusive apprenticeship program or participating in an existing inclusive apprenticeship program?
 10. How many persons with a disability participate in apprenticeships, and what are their characteristics? How many inclusive apprenticeships currently exist?

The evidence generated by the evaluation will be relevant not only to PIA and their AIO partners, but to ODEP staff assessing current and future apprenticeship and employment initiatives for people with disabilities, and to employers, training institutions and workforce development partners seeking knowledge and evidence about effective models for supporting inclusive apprenticeship. The evidence will identify models used by inclusive apprenticeship programs that are perceived to be useful or successful, which can be considered by ODEP and other apprenticeship programs who are implementing their own models. The evidence will also identify barriers and challenges perceived by AIOs and inclusive apprenticeship programs. These perceived barriers and challenges can be used by ODEP in their planning to support future employment and apprenticeship initiatives.

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.

Information technology will be used to collect the PIA Partners Survey data.

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 2 above.

The PIA evaluation instruments will not require collection of information that is available through alternate sources. The PIA AIO and partner survey, site visit interviews, and apprentice focus groups are collecting new data that are not available elsewhere. The instruments were designed to complement existing data sources to prevent duplication of data collection.

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

The apprentice focus groups will not be administered to any small businesses or entities, only apprentices. However, the PIA partners responding to the survey or interviewed for site visits could be small businesses or other small entities. If small businesses are involved, only the minimal amount of data needed for this study will be collected. Participation is voluntary if small businesses or other small entities are unable to participate. For the site visits, ODEP will work with PIA and the AIOs to select the most appropriate respondents.

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.*

If these one-time data are not collected, ODEP will not be able to document and understand the strategies designed and implemented by the AIOs and their partners and their perceived outcomes to make apprenticeship more inclusive of people with disabilities. A research study will provide important information on ways to improve inclusive apprenticeship models and strategies. The evidence generated by the study will benefit ODEP, PIA, and PIA's AIOs, as well as federal policymakers and administrators assessing current and future inclusive apprenticeship initiatives. It will also benefit employers, training institutions and workforce development partners seeking knowledge and evidence about effective inclusive apprenticeship models, practices, partnerships and strategies to improve and scale their systems.

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 a 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 secrets, 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 for the proposed data collection.

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.

1. Federal Register announcement

The 60-day notice to solicit public comments was published in the Federal Register on June 4, 2021 (86 FR 30069). A copy of this 60-day notice is included as supplemental information with this information collection request. ODEP did not receive comments from the public on the ICR.

2. Consultation outside of the agency

No consultation outside the agency is planned.

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

Respondents participating in the apprentice focus groups will receive a \$25 gift card or cash.

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

Information collected will be kept private to the extent permitted by law. The evaluation team complies with DOL data security requirements by implementing security controls for processes that it routinely uses in projects that involve sensitive data. Further, the evaluation is being conducted in accordance with all relevant regulations and requirements.

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.

This project will not collect sensitive information. However, because the project focuses on apprenticeship programs that are inclusive of people with disabilities and because the focus groups will include apprentices, it is possible that apprentices with disabilities will discuss their disability during the focus group. The focus group discussion guide does not include any questions about apprentices' disabilities but in a semi-structured conversation the topic may come up. The project team will seek Institutional Review Board (IRB) approval for final, OMB-approved instruments.

12. Provide estimates of the hour burden of the collection of information.

* 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 and aggregate the hour burdens.

* 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 under “Annual Cost to Federal Government.”

Table A.1 provides the annualized respondent hour and cost burden estimates for the data collection activities for which this package requests clearance. The evaluation is requesting clearance for a period of three years. Burden estimates are based on the study team’s experience conducting similar data collections. The table reflects estimated total respondent numbers that have been annualized over the 3 years of the study.

Table A.1. Estimated annualized respondent hour and cost burden

Type of instrument	Number of respondents	Number of responses per respondent	Total number of responses	Average burden of time per response (hours)	Estimated burden hours	Average hourly wage ⁴	Annual burden cost
AIO, PIA partner, and community of practice member survey	90 ¹	1	90	0.5	45	\$36.13 ⁴	\$1,625.85
AIO program staff and partner interview topic guide	24 ²	1	24	1	24	\$36.13 ⁴	\$867.12
Apprentice focus group guide	20 ³	1	20	1	20	\$7.25	\$145
Total	134		134		89		\$2,637.97

¹ Assumes 90 AIOs, partners, and community of practice members collected in a single year.

² Assumes interviews with 12 program and partner staff in 6 AIOs collected over three years.

³ Assumes interviews with 10 apprentices in programs with 6 AIOs collected over three years.

⁴ Hourly wage for program staff and partners reflects the May 2020 mean hourly wage estimate for “social and community service managers” as reported by the U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wage Estimates, 2020, “May 2020 National Occupational Employment and Wage Estimates United States,” (accessed from the following web site: <https://www.bls.gov/oes/current/oes119151.htm>).

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

** 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 services 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 collections 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 are no costs to respondents or record keepers resulting from the collection of information, aside from the hour burden already reflected on the burden worksheet.

14. Provide estimates of annualized costs 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), and any other expense that would not have been incurred without this collection of information.

The total cost to the Federal government over four project years is \$581,753.00, and annualized cost to the federal government is \$145,438.25. Costs result from the following two categories:

- a. The annualized cost to the federal government for the evaluation contractor, the Urban Institute, during which data collection and analysis will occur (Contract Number: DOL-1605C5-20-F-00042).¹ Therefore, the annualized cost is $(\$581,753) / 4 = \$145,438.25$.
- b. The annualized cost for federal technical staff to oversee the evaluation is \$12,788. This is calculated by the following: an annual level of effort of 200 hours for one Washington, DC-based Federal GS-14 step 4 employee earning \$63.94 per hour. (See Office of Personnel Management 2020 Hourly Salary Table at

¹ The total contractor cost includes the cost for \$25 gift cards paid to focus group participants.

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf.) Therefore, the annualized cost is 200 hours x \$63.94 = \$12,788.

The total annualized cost to the federal government is **\$158,226.25**.

\$145,438.25
+ \$12,788
= **\$158,226.25**

15. *Explain the reasons for any program changes or adjustments reported on the burden worksheet.*

This is a new information collection.

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

Data collection will begin in 2022 and will end in 2024. After data collection, data will be presented in summary formats, tables, charts, and graphs to illustrate the results. An interim report will be submitted in 2022 and a final report will be submitted in 2024.

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 OMB approval number and expiration date will be displayed or cited on all forms completed as part of the data collection.

18. *Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”*

No exceptions are necessary for this information collection.