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Office of Management and Budget (OMB)

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Subject: Non-Substantive Change Request – Employment Processes as Barriers to
Employment in the Lower-Wage Labor Market (OMB #0970-0356)

This memo requests approval of non-substantive changes to the approved generic information collection, Employment Processes as Barriers to Employment in the Lower-Wage Labor Market, approved under the Formative Data Collections for ACF Research umbrella generic (OMB #0970-0356).

Background

- **Initial Approval:** OMB issued approval of the Employment Processes as Barriers to Employment in the Lower-Wage Labor Market data collection activities on March 31, 2022. The approved data collection is for discussions with individuals (“project collaborators”) who can provide a variety of perspectives on racially biased employment processes in the low-wage labor market that are not available through other avenues, including published literature. This information will help inform future ACF research, including identifying promising practices for mitigating barriers to employment and advancement for people of color that may be the focus of further ACF-supported studies. The initial OMB request did not include any tokens of appreciation.
- **Progress to Date:** In the month since initial OMB approval of the Employment Process as Barriers project collaborator interviews, ACF has conducted three of 12 planned interviews (see table below). Among low-wage workers of color, ACF has interviewed one of four planned respondents. Further, only the worker interviewed has responded to the outreach attempt. Though the overall number of interviews is small, making it difficult to determine overall trends in outreach to collaborators, the team has, to date had comparatively more success in receiving affirmative responses for most other interview types. In conducting outreach, study partners have indicated that it may be difficult for workers in low-wage jobs to participate in the interviews, compared to other categories of respondents, because they cannot fit the interviews into their workdays.

Respondent Type	Target Number of Interviews	Responses Received	Interviews Completed
Employers	3	2	0
Workers of color in low wage jobs	4	1	1

Staff from organizations that serve or advocate for people of color	1	1	0
State and local workforce development administrators	2	2	2
Software developers ^a	2	0	0

Challenges that motivate proposed change: Executive Order (EO), Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO 13985)¹ emphasizes consulting with communities that have been historically underserved by Federal policies and programs. The Presidential Memorandum on Restoring Trust in Government through Scientific Integrity and Evidence-Based Policy Making², as well as the ACF Evaluation Policy³ discuss community engagement and inclusion in research. Consistent with these guidance documents, ACF is including a broad range of project collaborators to ensure involvement with a variety of people with diverse experiences and perspectives in the low-wage workforce.

Most project collaborators are participating in the information collection in their professional roles relevant to the job duties—for instance, as human resources professionals or workforce practitioners. Workers of color are an exception. It is their personal experience, not specific professional roles that qualify them to speak with us. They are also typically not able to take time out of their professional workday to speak with us. Their participation, therefore, reflects more of a personal commitment of an hour of their time than is the case for other project collaborators. ACF has encountered challenges recruiting workers in low-income jobs to participate. ACF has received some feedback that not offering a token of appreciation in recognition of that commitment reflects a lack of appreciation and respect and is inconsistent with invitees’ expectations and with the above referenced guidance.

Overview of Requested Changes

ACF requests a non-substantive modification of the Employment Processes as Barriers to Employment in the Lower-Wage Labor Market incentive structure to promote interview participation among respondents who are low-wage workers of color and support their participation. Most of the project collaborator respondents will be participating in the interviews within their professional capacity and during their normal workday, thus will not be offered tokens of appreciation. Respondents who are low-wage workers of color, however, need to take time off work to participate in the conversations or participate during their free time. Providing tokens of appreciation for the hour of personal time for low-wage workers of color is likely to promote participation by allowing respondents to, for example, take time off work or secure childcare to participate in the interview after work hours. Their participation is critical to the comprehensiveness of information collected as part of this study and thus scientific knowledge. Consequently, ACF is proposing the addition of \$35 cash gift cards as tokens of appreciation for

¹ <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>

² <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policymaking/>

³ <https://www.acf.hhs.gov/opre/report/acf-evaluation-policy>

project collaborators who are low-wage workers of color. Gift cards will be offered to all four project collaborators who are low-wage workers, including the individual who has already been interviewed, to ensure equity across this respondent category.

Time Sensitivities

ACF is aiming to complete all project collaborator interviews before June 2022 so the project can stay on track and deliverables that will inform ACF's understanding of these issues and future research can be finalized.