June 2022

PART A: JUSTIFICATION

This is a **new collection** request associated with the Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities (SUPPORT) Act Grants Evaluation.

The Chief Evaluation Office (CEO), in partnership with the Employment and Training Administration (ETA), is sponsoring an implementation evaluation of grants awarded under the Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities (SUPPORT) Act. CEO is seeking approval from OMB under the Paperwork Reduction Act for data collection instruments associated with the evaluation. With the goal of producing important information on innovative practices and perceived implementation challenges in providing services that integrate employment and substance use disorder (SUD) treatment services, the U.S. Department of Labor (DOL awarded nearly \$20 million in SUPPORT Act grants to four state workforce agencies. Grantees may use these funds to provide a range of employment services for affected individuals. The grants can also be used to train and support two types of workers: workers personally affected by opioid misuse or other SUDs (including having a friend or family member with a substance use disorder), and workers who seek to transition to professions that address the opioid crisis (such as addiction and SUD treatment, mental health services, and pain management). Finally, grantees can use a portion of their funds for individual or group outpatient treatment and recovery services, in addition to using funds for employment services. DOL contracted with Abt Associates and its partner, MDRC, to conduct an implementation evaluation that will inform program administrators and practitioners about providing services that address both employment and treatment needs for people with SUDs. Data collection instruments described in this submission will be used to collect implementation study data.

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 2018 SUPPORT Act directed DOL to develop a pilot grant program to address the economic and workforce impacts associated with high rates of SUDs. In 2020, DOL launched its SUPPORT Act pilot grant program, awarding nearly \$20 million in SUPPORT Act grants to four state workforce agencies: the Florida Department of Economic Opportunity, the Maryland Department of Labor, the Ohio Department of Job and Family Services, and the Wisconsin Department of Workforce Development. The four state grantees awarded sub-grants to 18 total local workforce development areas ("sub-grantees").

DOL's CEO, in partnership with ETA, is sponsoring an implementation evaluation of these grants. Abt Associates is conducting the evaluation in partnership with MDRC. The evaluation of the SUPPORT Act grants is designed to inform program administrators and practitioners on innovative approaches and perceived implementation challenges in providing services that address both employment and treatment needs for people with SUDs.

The Department of Labor Funding Opportunity Announcement for the SUPPORT Act grants (FOA-ETA-20-01) established DOL's desire to document activities across grantees

through an implementation evaluation. Further, the FOA established grantees must participate in the evaluation and grantees' notices of award stipulated they must cooperate with a third-party evaluation. Data needs to be collected between the fall of 2022 and summer of 2025. This evaluation is authorized by Section 169 of the Workforce Innovation and Opportunity Act (WIOA), which authorizes research and evaluations to improve the management and effectiveness of workforce programs and activities such as the SUPPORT ACT grant program (29 USC. §3225a). CEO undertakes a learning agenda process each year to identify departmental priorities for program evaluations. This DOL-funded study was a result of Section 169 of the Workforce Innovation and Opportunity Act and the annual process to determine the Department's research priorities for the upcoming year. It contributes to the labor evidence base to inform employment and training programs and policies and addresses departmental strategic goals and priorities.

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 SUPPORT Act Grants Evaluation will answer research questions focused on four broad topics:

- 1. What type of participants did the SUPPORT Act sub-grantees serve?
- 2. How were SUPPORT Act programs implemented?
- 3. How did SUPPORT Act grantees and sub-grantees engage partners?
- 4. What were the key outcomes of the SUPPORT Act grants?

The implementation study will address these questions through a series of interviews with grantee, sub-grantee, and partner staff; in-depth participant interviews; and grantee, sub-grantee, and partner surveys. This submission is to request clearance for the data collection instruments that will be used for these efforts: a data collection planning interview guide; three web-based survey instruments; interview guides for site visits; a participant interview guide; a participant consent form; and a final reflection interview guide. These, along with administrative data recorded in DOL's Participant Individual Record Layout (PIRL) and on-site observations of key activities are necessary to ensure that the SUPPORT Act Grants Evaluation can adequately document and assess grantee programs. Sub-grantees will also participate in an implementation learning activity (which does not entail data collection) that provides an opportunity to reflect on and troubleshoot perceived implementation challenges. Following is a description of each data collection instrument that requires OMB clearance.

- 1. An interview guide for planning data collection with program managers at four grantee and eight sub-grantee sites.
- 2. A one-time survey of staff from all grantees.
- 3. A one-time survey of staff from all sub-grantees.

- 4. A one-time survey of up to 90 sub-grantee community and employer partner representatives.
- 5. Interview guides to be used during site visits to four grantees and eight sub-grantees.
- 6. An interview guide to be used with approximately 40 program participants.
- 7. A form for participants to consent to being interviewed.
- 8. A short form for participants to complete and provide basic demographic information.
- 9. A guide for final reflection interviews with four grantees and eight sub-grantees.

Interview Guide for Data Collection Planning

Data collection planning interviews via videoconference with all four grantees and eight sub-grantees will collect background information needed to plan the site visits. These calls will provide an opportunity to gather updated information to inform the site visit and begin planning for data collection and other implementation study components, including on-site observations and implementation learning activities.

Grantee, Sub-grantee, and Partner Surveys

The three surveys will collect consistent information about SUPPORT Act grant programs from all four grantees and 18 sub-grantees and up to five community and employer partners for each sub-grantee (for a total of 90). The Grantee Survey will be more limited in nature, reflecting the role of grantees in daily program operations. It will focus on grantees' relationships with partners. The Sub-grantee Survey will cover background and context, program implementation and services provided, employer engagement and perceptions about SUD, perspectives on participant experiences, and relationships with partners. The Partner Survey will cover history and nature of their involvement in grant-funded services, employer engagement, and relationships with the sub-grantee and other partners.

Interview Guide for Grantee and Sub-grantee Site Visits

One round of site visits to four grantees and eight sub-grantees will collect in-depth qualitative information on program operations in support of the implementation study. The interviews will be with the following:

- grantee administrators,
- sub-grantee administrators,
- program staff,
- community partners, and
- employer partners.

These modular interview guides will cover a wide range of topics on SUPPORT Act grant implementation. Interview guides will be tailored for each respondent based on their role and responsibilities. While the surveys will capture consistent information about grant-funded program practices from all sub-grantees, the site visits will document practices in more detail from a smaller number of grantees and sub-grantees. This will allow a better understanding of how programs were implemented; their partnerships; perceived challenges faced in implementing programs and how they overcame them; and plans for replication, scaling and sustainability beyond the grant period.

In-depth Participant Interview Consent Form

For the in-depth participant interviews, respondents will first be asked to consent to the interview. The consent form states that the evaluators treat the information respondents provide as private. All publications based on the interviews will report findings anonymously and the names of participant respondents will not be published in any form. Only the evaluation team will be able to identify individual responses. To protect respondents' privacy, all data will be stored on a password protected drive established at the contractor site. Access to this drive will be limited to research staff members who are working on the project and have signed the non-disclosure agreement.

Interview Guide for In-depth Participant Interviews

In-depth participant interviews will collect detailed information on participants' experiences and attitudes about the SUPPORT Act grant-funded programs. This interview guide will cover participant experience in several areas including how the opioid crisis has affected them and/or their families, the barriers participants in recovery have faced to finding and retaining employment, the role of employment and employment services in alleviating the effects of the crisis on their lives, their interest in and goals participating in the program, and their perspectives on how well grant-funded services have met their needs.

Participant Interview Information Form

Following the in-depth participant interviews, respondents will be asked to complete a brief form. This instrument will capture demographic information that will allow the research team to describe in aggregate the group of respondents. To protect respondents' privacy, names will not be recorded and all data will be stored in a locked file cabinet at the contractor site. Access to these forms will be limited to research staff members who are working on the project and have signed the non-disclosure agreement.

Final Reflection Interview Guide

Approximately one year after the site visits, a semi-structured interview protocol will be used to guide videoconference interviews with program managers for all four grantees and the eight sub-grantees selected for implementation study visits. The guide will be used to document implementation lessons and the extent to which services and partnerships will be sustained once the grants end.

Users of Information

The evaluation of the SUPPORT Act grants will produce important information on innovative practices and perceived implementation challenges in providing services that integrate employment and SUD treatment services. The immediate users of data collected will be the Abt Associates evaluation team, who will use the data to describe how the grants are being implemented and derive perceived lessons for developing and operating employment programs serving SUD-affected populations.

Indirect users of the data collected include:

- DOL and other federal agency staff
- State and local workforce agencies or systems and organizations serving SUD-affected populations
- Researchers
- Policymakers at the local, state, and federal levels of government looking to increase and expand employment services for SUD-affected populations
- Others interested in understanding the experiences and lessons from expanding employment services for SUD-affected populations.

Finally, a Public Use File will be prepared and made available for future research.

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.

The Grantee, Sub-grantee, and Partner Surveys will build in multiple technological elements to minimize burden.

The surveys will be administered online. Burden-reducing features include:

- **Secure personalized access.** Each grantee, sub-grantee, and partner will receive a link and password to the web-based survey. The survey will be created using commercial software that will allow respondents to answer questions at a time that suits them.
- **Automated skip patterns.** Skip logic embedded in the survey place less of a burden on the respondent than the customary "if-then go to" instructions of a paper and pencil questionnaire. Including efficient skip patterns minimizes respondent burden by not asking inappropriate or non-applicable questions
- **Modularity.** The survey will be in a modular format that allows the primary respondent to pass sections or questions on to other staff members who may be better equipped to address particular topics.
- Automated edit checks. The computerized instrument will check for allowable ranges for quantity and range value questions, minimizing out of range or unallowable values. These eliminate entry errors that can require follow-up via phone calls to gather correct details.
- **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.

This will be the first evaluation of the SUPPORT Act grants. Qualitative grantee- and subgrantee- level data that we request in this PRA package has not been collected before and is not collected in other formats or through other means. In regard to the ICR for the implementation study site visit interview guides, the protocols are designed to complement and build on information provided by grantees and sub-grantees under an earlier knowledge development phase. In regard to the ICR for the Grantee, Sub-grantee, and Partner survey, grantees currently submit narrative quarterly reports to DOL, but they do not provide sufficient detail across implementation study topics. Grantees do provide information about their program activities in the PIRL, and the survey is designed to complement this data by exploring study topics in further detail. In-depth participant interviews provide a unique opportunity to collect first-hand information about their experiences and perspectives.

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

The involvement of small businesses or other small entities that are not grantees or subgrantees is expected to be limited. Interviews with and surveys of sub-grantee community or employer partners may involve small businesses or other small organizations. For the interviews, no information will be collected without their voluntary consent and the discussions would be limited to 60 minutes. Similarly for the survey, no information will be collected without consent

and each response will take 30 minutes. Only the minimal amount of data needed for this study will be collected.

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 Grantee, Sub-grantee, and Partner Surveys are a one-time data collection activity. The surveys are critical to the implementation study. They will systematically document how all SUPPORT Act grant-funded programs operate. Without this information, the evaluators will not have details on the implementation of programs across all grantees.

The initial planning interviews and site visits to four grantees and eight sub-grantees will also be critical to the implementation study. The visits will capture information about grant implementation, changes made over time and reasons for them, and plans to sustain activities following the end of the grant. The in-depth information gathered during the site visits will complement the information gathered from the survey. Without these visits, the evaluation team would not be able to capture the evolving nature of program services, as well as document perceived challenges and their solutions. The final reflection interviews conducted approximately one year after the site visits will document implementation lessons and the extent to which services and partnerships will be sustained once the grants end.

In-depth participant interviews provide a unique opportunity to understand variation in service delivery through examining participant experience in several areas including how the opioid crisis has affected them and/or their families, the barriers participants in recovery have faced to finding and retaining employment, the role of employment and employment services in alleviating the effects of the crisis on their lives, their interest in and goals for participating in the program, and their perspectives on how well grant-funded services have met their needs.

- **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.

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13 and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995)), DOL published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on April 13, 2022 (87 FR 21924) and provided a 60-day period for public comment. No public comments were received.

Consultation with Experts Outside of the Study

The evaluation team consulted with members of the project Technical Work Group on the evaluation design:

- Lawrence Vinson, Chief of Staff, Addiction Recovery Care, LLC;
- Craig Gebers, Chief Recovery Officer, Zepf Center;
- Mary Brolin, Scientist and Lecturer, Institute for Behavioral Health at the Heller School for Social Policy and Management, Brandeis University;
- Marianne Cloeren, Associate Professor, University of Maryland School of Medicine; and
- Kate Dunham, Director of the Workforce and Human Services Division, Social Policy Research Associates.

Consultation with Representatives of Grantees

The evaluation team consulted with representatives in the following DOL offices on the development of the evaluation design and the data collection instruments: the Division of Research and Evaluation within ETA that commissioned the evaluation; the Office of Workforce Investment within ETA; and the CEO, which coordinates, manages, and implements the Department's evaluation program.

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

The SUPPORT Act Grants Evaluation will use incentives to encourage participation in indepth participant interviews. Participants completing an in-depth interview will be given a \$20 gift card to thank them for their time. Offering incentives to gain cooperation and solicit participation is a well-established practice in social science research and program evaluation for both small-scale studies and sample surveys. Participants are provided incentives as a gesture of appreciation for voluntary participation in data collection activities. No other respondents will receive payments.

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. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. To protect site visit respondents' privacy, all hard copies of site visitor notes will be stored in a locked file cabinet at Abt Associates when not in use. Electronic versions of site visitor notes will be stored on a password protected drive set up by the IT departments at Abt and its the subcontractor. Access to this drive will be limited to research staff members who are working on the project and have signed non-disclosure agreements with DOL.

None of the respondents that participate in grantee, sub-grantee, and partner interviews or complete the survey will be identified in any report or publication of this study or its results; their participation will be voluntary; and their information will be kept private. This information will be provided verbally to interview respondents and verbal consent will be requested.

In-depth interview participants will receive a written consent form. The In-depth Participant Interview Consent Form will provide all of the assurances of privacy and data protection information to interview participants.

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.

There are no sensitive questions in the Interview Guide for Data Collection Planning, the Interview Guides for Grantee and Sub-grantee Site Visits; the Final Reflection Interview Guide; or the Grantee, Sub-grantee, or Partner surveys. Several questions in the In-Depth Participant Interview Guide may be considered sensitive by some program participants. These questions ask about participant experience in several areas including how the opioid crisis has affected them and/or their families, the barriers participants in recovery have faced to finding and retaining employment, the role of employment and employment services in alleviating the effects of the crisis on their lives, their interest in and goals participating in the program, and their perspectives on how well grant-funded services have met their needs. Participants will be informed that their participation is voluntary, that they may decline to answer any question that they wish, and that their information will be kept private and they will not be identified in any report or publication of this study or its results.

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."

Exhibit A1 presents the estimated respondent burden on grantee, sub-grantee, and partner agency staff and program participants to complete the data collection instruments included in this package. It shows the average time, in hours, to participate in interviews for the implementation study and to complete the survey.

The SUPPORT Act Grants Evaluation team will interview the grant director or designee at each of four grantees for the data collection planning interview. Similarly, the team will interview one staff member at each of the eight sub-grantees for the planning interview. As part of the site visits, the evaluation team will interview the grant director and up to four additional staff from each grantee, and up to 10 staff and partners (including the sub-grantee director) from each of the eight sub-grantees participating in site visits. Grantee and sub-grantee data collection planning interviews will take approximately 1 hour. Each grantee and sub-grantee director interview will take approximately 1.5 hours, and each grantee staff, sub-grantee staff, and partner interview will take approximately 1 hour. During site visits, the evaluation team will interview five participants at each of eight sub-grantees. Each participant will sign an Informed Consent Form, complete an in-depth interview, and complete a Participant Information Interview Form. The consent form and information form will each take approximately 5 minutes. The interviews will take approximately 1 hour. Final reflection interviews will be conducted with directors at each of the grantees and sub-grantees. Each of these interviews will take approximately 1 hour.

The evaluation team estimates the Grantee and Partner Surveys will take an average of 30 minutes and the Sub-grantee Survey will take an average of 1 hour to complete based on prior similar data collection. The evaluation team will pre-test the surveys with one SUPPORT Act grantee and one sub-grantee, and one community partner to confirm this estimate. Respondents for the Grantee and Sub-grantee Survey will most likely be the directors or an administrator. Respondents for partners agencies are also likely to be administrators. The estimated response rate for the Grantee Survey is 100 percent as participation in evaluation activities is required as a condition of the grant award and the universe is small allowing for concentrated reminders and follow-up. The estimated response rate for the Sub-grantee Survey is 90 percent given the small universe and planned reminders and follow-up. Sub-grantees will nominate their most engaged

partners for the survey; therefore, the estimated response rate for the Partner Survey is 80 percent.

Exhibit A2: Estimated Annualized Respondent Hour and Cost Burden

Instrument	Annual Number of Respondents	Number of Responses per Respondent	Average Burden Hour per Response	Annual Estimated Burden Hours	Average Hourly Wage	Total Annual Burden Cost
Interview Guide for Data Collection Planning – Grantee Director ^a	1	1	1	1	\$30.54	\$30.54
Interview Guide for Data Collection Planning – Sub- grantee Director ^b	2	1	1.5	3	\$30.54	\$91.62
Survey –Grantee Director ^a	1	1	0.5	1	\$30.54	\$15.27
Survey – Sub-grantee Director b	6	1	1	6	\$30.54	\$183.24
Survey – Sub-grantee Community Partner ^f and Employer Partner ^e	30	1	0.5	15	\$18.84	\$226.08
Interview Guide – Grantee Director ^a	1	1	1.5	2	\$30.54	\$61.08
Interview Guide – Grantee Staff ^c	5	1	1	5	\$18.84	\$100.48
Interview Guide – Sub-grantee Director ^b	3	1	1.5	5	\$30.54	\$137.43
Interview Guide – Sub-grantee Staff ^d	13	1	1	13	\$18.84	\$251.20
Interview Guide – Sub-grantee Community Partner ^f	8	1	1	8	\$18.84	\$150.72
Interview Guide – Sub-grantee Employer Partner ^e	3	1	1	3	\$45.30	\$120.80
In-depth Participant Interview Consent Form ^g	13	1	0.12	2	\$10.15	\$16.24
In-depth Participant Interview Guide ^g	13	1	1	13	\$10.15	\$135.33
Participant Interview Information Form ^g	13	1	0.12	2	\$10.15	\$16.24
Final Reflection Interview Guide – Grantee and sub- grantee Director ^a	4	1	1.5	2	\$30.54	\$61.08
Total	116	17	NA	85	NA	\$1,855.41

^a The median hourly wage for Grant Directors was calculated based on information from the Bureau of Labor Statistics; May 2020 National Industry-Specific Occupational Employment and Wage Estimates found at https://www.bls.gov/oes/2020/may/naics3 624000.htm#11-0000 Social and Community Service Managers (NAICS 62400, SOC code 11-9151 wage rate of \$30.54).

^b The median hourly wage for Sub-grantee Directors was calculated based on information from the Bureau of Labor Statistics; May 2020National Industry-Specific Occupational Employment and Wage Estimates found at

https://www.bls.gov/oes/2020/may/naics3_624000.htm#11-0000: Community and Social Service Managers (NAICS 62400, SOC code-11-9151 wage rate of \$30.54).

^cThe median hourly wage for Grantee Staff was calculated based on information from the Bureau of Labor Statistics; May 2020 National Industry-Specific Occupational Employment and Wage Estimates found at https://www.bls.gov/oes/2020/may/naics3 624000.htm#11-0000 Community and Social Service Occupations (NAICS 62400, SOC code-21-0000 wage rate of \$18.84).

^d The median hourly wage for Sub-grantee Staff was calculated based on information from the Bureau of Labor Statistics; May 2020 National Industry-Specific Occupational Employment and Wage Estimates found at https://www.bls.gov/oes/2020/may/naics3 624000.htm#11-0000 Community and Social Service Occupations (NAICS 62400, SOC code-21-0000 wage rate of \$18.84).

^eThe median hourly wage for Employer Partners was calculated based on information from the Bureau of Labor Statistics; May 2020 National Industry-Specific Occupational Employment and Wage Estimates found at https://www.bls.gov/oes/2020/may/naics4 621300.htm Offices of Other Health Practitioners Human Resources Managers (NAICS 621300, SOC code 11-3121 wage rate of \$45.30).

^fThe median hourly wage for Community Partners was calculated based on information from the Bureau of Labor Statistics; May 2020 National Industry-Specific Occupational Employment and Wage Estimates found at https://www.bls.gov/oes/2020/may/naics3 624000.htm#11-0000: Community and Social Service Occupations. (NAICS 62400, SOC code-21-0000 wage rate of \$18.84).

^g The median hourly wage for participants was calculated based on the loaded federal minimum wage.

- **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 additional costs to respondents other than their time.

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 annualized cost to the federal government is \$637,423. Costs result from the following two categories:

- a. The estimated cost to the federal government for the contractor to carry out this implementation study is \$1,235,514. Annualized over two years, this comes to \$617,757.
- b. The annual cost borne by DOL for federal technical staff to oversee the contract is estimated to be \$20,665.65. We expect the annual level of effort to perform these duties will require 200 hours for one federal GS 14 step 4 employee based in Washington, D.C., earning \$64.58 per hour. (See Office of Personnel Management 2021 Hourly Salary Table at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-

<u>tables/pdf/2021/DCB.pdf</u>.) To account for fringe benefits and other overhead costs, the agency has applied multiplication factor of 1.6:

200 hours \times \$64.58 \times 1.6 = \$20,665.60.

Thus, the total annualized federal cost is \$617,757+ \$20,665.60= \$637,422.60 (637,423 rounded).

- **15**. *Explain the reasons for any program changes or adjustments reported on the burden worksheet.*This is a new data collection effort.
- **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.

For the evaluation of the SUPPORT Act grants, CEO is seeking OMB approval beginning in summer 2022 and ending in 2024.

- **Data collection planning interviews** with grantees and sub-grantees occur in summer 2022.
- **Grantee, Sub-grantee, and Partner surveys** occur in fall 2022.
- **Implementation study site visits, including in-depth participant interviews,** occur between fall 2022 and winter 2023.
- **Final reflection calls** with grantees and sub-grantees occur in early 2024.

Deliverables for the SUPPORT Act Grants Evaluation will be completed on the following schedule:

- Rapid analysis memoranda providing preliminary findings and rapid results prior to and after the implementation study report. Anticipated topics for these analyses are:
 - Partnerships, drawing on the grantee, sub-grantee, and partner surveys and site visits, by the end of 2022, and
 - Participant perspectives, drawing on in-depth participant interviews, by the end of 2023.
- **Implementation study report,** synthesizing findings across all data collection activities will be submitted in the fall of 2024.
- **Public use or restricted use data file** containing all data collected for the study with personal identifiers removed will be submitted by the fall of 2025.
- **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.

All instruments created for the SUPPORT Act Grants Evaluation will display the OMB approval number and the expiration date for OMB approval.

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.