

PART A: JUSTIFICATION

This is a **new collection** request associated with the Older Workers Descriptive and Implementation Study.

The Chief Evaluation Office of the U.S. Department of Labor (DOL), in collaboration with the Employment Training Administration (ETA) funded the Older Workers Implementation and Descriptive Study. The purpose of this study is to examine the implementation of the Senior Community Service Employment Program (SCSEP) and other DOL workforce programs serving older workers to inform the continuous improvement of SCSEP and develop options for potential future research studies that would address gaps in the evidence base related to employment services for older workers. DOL's Chief Evaluation Office contracted with the Urban Institute and its partner Capital Research Corporation to conduct the study of these efforts.

This package requests clearance for nine data collection activities which need to start in October 2022. A timely start to the information collection is critical for conducting the study. The nine data collection instruments for the implementation study are (Attachments A-I):

1. SCSEP subgrantee/local site survey
2. SCSEP subgrantee/local site staff interview protocol
3. SCSEP grantee staff interview protocol
4. SCSEP host agency interview protocol
5. SCSEP employer partner interview protocol
6. SCSEP American Job Center partner interview protocol
7. SCSEP community organization partner interview protocol
8. SCSEP participant focus group protocol
9. SCSEP participant interview guide

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.

Employment rates decline with age for both voluntary reasons (primarily retirement) and involuntary reasons (such as disability and job loss). Employment rates fall from ages 55 to 61 to ages 62 to 70, about 30 percentage points. Employment rates fall even further for ages over 70. (These data are from the 2019 American Community Survey Public Use Microdata Sample, US Census Bureau.) Despite these low rates, many older individuals desire to work. According to the Bureau of Labor Statistics,¹ older adults are overrepresented among discouraged workers (out-of-work adults not actively looking for work because they believe there are no jobs for them). Those ages 55 and older represent 27 percent of discouraged workers but only 23 percent of the labor force. Discouraged workers may have lost jobs and found it difficult to replace their previous wages, face age discrimination from employers, or lack skills (including technical skills) needed to succeed in available jobs.

The challenges facing older workers are especially pronounced for those in low-wage jobs. Nearly a quarter of older workers ages 62 and older were in unstable and low-wage jobs in 2015, an increase from 14 percent in 2005.² However, older adults with low incomes, who potentially could benefit most from employment and training programs, are more likely to lack access to and resources for training opportunities. At least one past study also shows that employers are less likely to provide training opportunities to employees who have less education than workers who have more education.³

SCSEP, as authorized by Title V of the Older Americans Act of 1965 (OAA), has a dual purpose “to foster individual economic self-sufficiency and to increase the number of participants placed in unsubsidized employment in the public and private sectors, while maintaining the community service focus of the program.” The OAA was amended by the Supporting Older Americans Act of 2020 and the Older Americans Act Reauthorization Act of 2016 (2016 OAA).

This evaluation of SCSEP is authorized by Title 29 of the American Competitiveness and Workforce Improvement Act, which states that “the Secretary of Labor shall . . . award grants to eligible entities to provide job training and related activities for workers to assist them in obtaining or upgrading employment in industries and economic sectors . . . projected to experience significant growth and ensure that job training and related activities funded by such grants are coordinated with the public workforce investment system (29 USC 3224(a)).”

¹Labor Force Statistics from the Current Population Survey: Persons Not in the Labor Force by Desire and Availability for Work, Age, and Sex,” US Bureau of Labor Statistics, accessed September 23, 2021, <https://www.bls.gov/cps/aa2020/cpsaat35.htm>; “Labor Force Statistics from the Current Population Survey: Civilian Labor Force Series LNU01024887, LNU0100060, and LNU01024230,” US Bureau of Labor Statistics, accessed September 23, 2021, <https://data.bls.gov/PDQWeb/ln>.

² Ghilarducci, T., Webb, A., and Papadopoulos, M. 2018. “The Growth of Unstable and Low-Wage Work Among Older Workers.” Policy Notes Series. New York, NY: Schwartz Center for Economic Policy Analysis and Department of Economics, The New School for Social Research.

³ Lerman, R. 2015. “Are Employers Providing Enough Training? Theory, Evidence and Policy Implications.” National Academy of Sciences. http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_168146.pdf.

SCSEP places program participants in paid, part-time, community service assignments (CSAs) to obtain work experience, skills, or job training to help prepare them to transition into unsubsidized employment. In addition to job training and placement services, SCSEP can provide participants with or refer them to support services. The ultimate goal of SCSEP is to help participants obtain employment, improve their economic situation, and become self-sufficient. SCSEP serves adults ages 55 and older whose family income is no more than 125 percent of the federal poverty level and who are unemployed. It gives priority to veterans and their qualified spouses, and to people who are over age 65, have a disability, low literacy skills, or limited English proficiency; live in rural areas; are homeless or at risk of becoming homeless; were once incarcerated; have poor employment prospects; or failed to find employment after receiving services through other WIOA programs and the American Job Centers.

Congress authorized \$405 million for SCSEP program year 2021, funding national and state grantees. The last research process and outcome study funded by DOL on SCSEP was published ten years ago.⁴ The current project focuses on the implementation of the SCSEP program and its components and strategies within and beyond SCSEP that can successfully serve older workers. It will inform how to improve services for older workers within SCSEP and other government and non-government employment programs serving older workers. It will also gather evidence on the adoption and continuation of new strategies during the pandemic and examine strategies to improve equitable access to and outcomes from SCSEP. Finally, it will develop options for possible future research and evaluation activities. The data for this project will be collected from national grantees between fall/winter 2022 and summer/fall 2023, to allow time for analysis and reporting by the end of the project at the end of June 2024.

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 inform:

- an **Implementation Study** to identify program typologies and models whose approaches, components, and service delivery could best serve older workers or populations with similar employment barriers. These typologies and models may include innovations in implementing paid work components, outreach to the target population, supports for participants, and strategies developed during the COVID-19 pandemic, especially those focusing on expanding equity; and
- an **evaluability assessment** and development of **options for potential future research and evaluation studies** that address gaps in the evidence base related to employment services for older workers.

⁴ Kogan, Deborah, Hannah Betesh, Marian Negoita, Jeffrey Salzman, Laura Paulen, Haydee Cuza, Liz Potamites, Jillian Berk, Carrie Wolfson, and Patty Cloud. 2012. "Evaluation of the Senior Community Service Employment Program SCSEP: Process and Outcomes Final Report." SPRA and Mathematica.

<https://www.mathematica.org/publications/evaluation-of-the-senior-community-service-employment-program-scsep-process-and-outcomes-study>

The **Older Workers Implementation and Descriptive Study** will address the following research questions:

- ***What strategies and partnerships are perceived to be promising in SCSEP and other DOL programs serving older workers?*** For this research question, the study team will examine the types of program models, strategies, components, and partnerships implemented by SCSEP and other DOL programs, and explore which are perceived to be promising.
- ***How might programs serving populations with similar barriers to older adults who have low incomes inform SCSEP?*** For this research question, the study team will explore other workforce programs in the communities in which SCSEP programs operate that address perceived challenges adults face in finding employment success. These programs may include non-SCSEP programs funded by federal agencies or privately, including other programs operated by SCSEP subgrantee organizations.
- ***How did SCSEP grantees adapt activities during the pandemic? What features will programs retain going forward and why?*** For this research question, the study team will build on the findings of the Early Implementation Study focused on a subset of national SCSEP grantees' response to the pandemic. The team will document responses and strategies at the local level and provide a longer-term view of the strategies adopted due to the pandemic but that have become a part of the program, such as virtual training.
- ***How are SCSEP grantees adapting their programs to better and more equitably serve older adults?*** For this research question, the study team will document strategies that grantees and subgrantees are using to recruit and serve participants with different characteristics (e.g., age, race, gender, work preference, skill level), how they address perceived challenges facing different groups of older workers in gaining unsubsidized employment, and the opportunities for change to better serve diverse populations of older adults.

The evidence generated by this study will be relevant to SCSEP grantees (national and state), DOL policy makers and administrators interested in improving SCSEP and other government funded training programs serving older workers, and other state and local policy makers and programs seeking knowledge and evidence about ways to improve employment services to older workers.

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, specifically the software program Qualtrics, will be used to program and administer the survey data collection. This survey software offers a user interface that is modern, secure, and easy to navigate for respondents. The software will also facilitate generation of tabulations of responses as surveys are completed by subgrantees and processed.

The survey will be hosted on the internet via a live secure web-link. To reduce burden, the surveys will employ the following: (1) secure log-ins and passwords so respondents can save and complete the survey in multiple sessions, (2) drop-down response categories so respondents can quickly select from a list, (3) dynamic questions and automated skip patterns so respondents only see those questions that apply to the, (including those based on answers provided previously in the survey), and (4) logical rules for responses so respondents' answers are restricted to those intended by the question.

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.

All nine data collection instruments are collecting new data that are not available through alternative sources.

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

The information collection does not target small businesses or entities. However, the evaluation grantees could be small organizations, such as businesses or nonprofit organizations. If small businesses are involved, 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.

If these one-time data are not collected, DOL will not have the information necessary to determine how SCSEP grantees are currently implementing the program on the ground, especially during a pandemic (or similar major disaster); what strategies grantees are employing that have potential to improve the program; and what possible future research could provide evidence of improvement.

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.

The 60-day notice to solicit public comments was published in the Federal Register on February 14, 2022 (87 FR 8296). There were no public comments.

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.

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.

The project includes a Technical Working Group (TWG) to provide substantive feedback throughout the project period. Members of the TWG are listed in Table A.1. They have expertise in research methodology as well as on programs and populations similar to those being served in the SCSEP program.

Table A.1. Technical Working Group

Jacqueline Angel

Wilbur J. Cohen Professor of Health and Social Policy and Professor of Sociology at The University of Texas at Austin.

Cal Halvorsen

Assistant Professor and Affiliate of the Center on Aging & Work at Boston College.

Maria Heidkamp

Director of Program Development at the Heldrich Center for Workforce Development at Rutgers University.

Susan Houseman

Vice President and Director of Research at W.E. Upjohn Institute for Employment Research

David Judkins

Principal Associate of Social and Economic Policy at Abt Associates.

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

CEO will provide a \$25 gift card to program participants that take part in the focus groups or individual participant interviews.

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

All respondents taking part in data collection activities are assured that information collected will be kept private to the extent permitted by law. In each data collection activity, respondents will be informed that all data will be used for research purposes only, will be kept securely, and individually identifiable data will not be shared with program staff or the Department of Labor. Participants will be assured no one will ever publish their name in connection with the information collected, but information will be combined with data across the study, so researchers can describe the overall program implementation and participant experiences. The team will clean and code variables to prepare the analysis file and will prepare documentation and a codebook for the analysis. They will finally tabulate responses to each survey question (i.e., absolute and relative frequency) and prepare basic statistics including mean/median/minimum/maximum and frequencies, depending on the question type. Further, all

respondents will be assured that their participation is completely voluntary and given the option of not answering any individual question.

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 study does not include any questions of a sensitive nature. However, the Urban Institute's Institutional Review Board (IRB) requires approval for all data collection activities involving surveys and interviews. The Urban Institute IRB has given approval for the data collection activities outlined here.

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.2 provides the annualized 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 team also had two national grantees review the survey instrument to help determine the time their subgrantees or local sites would need to complete the survey. Both reviewers estimated the completion time to be 3 hours. We believe this level of detail is needed to meet the goals of the study to collect information on SCSEP implementation.

We will conduct a survey with one subgrantee staff member for each of the 19 national SCSEP grantees.⁵ The total number of survey respondents will include 318 subgrantee staff. The number of these respondents is annualized over three years in Table A.2.

In-depth study will be done with 20 subgrantee local sites. In each of these, structured interviews will be done with subgrantee/local staff, host agency staff, grantee staff, employer partner, partner American Job Center staff, community organization partner staff. Most interviews will be 1 or 1.5 hours in length. However, the subgrantee/local site director or staff interviews may take up to 2 hours. We believe these individuals will be the most knowledgeable about local level implementation of SCSEP, and this level of detail is needed to meet the goals of the study. We indicate in the introduction that they are not expected to answer all questions so this estimate may vary across respondents. Interviews or focus groups will be done with SCSEP participants, depending on subgrantee circumstances. These burden estimates are based on our assumption that we will conduct focus groups in 8 sites and individual interviews in 12 sites. Local site interviews and participant data gathering is also annualized over three years in Table A.2.

Hourly wage for program staff and partners reflects the May 2021 mean hourly wage estimate for “social and community service managers” as reported by the U.S. Department of Labor, Bureau of Labor Statistics.⁶ Hourly wage for SCSEP participants is listed as the federal minimum wage.

⁵ The study will not survey state grantees or subgrantees because of the additional resources required and the determination that the state grantees are unlikely to provide substantially different types of information than national grantees.

⁶ See the U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wage Estimates, 2022, “May 2021 National Occupational Employment and Wage Estimates United States.” (accessed from the following web site as of April 14, 2022: https://www.bls.gov/oes/current/oes_nat.htm).

OLDER WORKERS IMPLEMENTATION AND DESCRIPTIVE STUDY

OMB CONTROL NO. 1290-ONEW

OMB EXPIRATION DATE:

Table A.2. Estimated Annualized Respondent Hour and Cost Burden

Type of instrument	Number of Respondents	Number of Responses Per Respondent	Total Number of Responses	Average Burden Per Response (in hours)	Estimated burden hours	Average Hourly Wage ¹	Annual Burden Costs
SCSEP subgrantee survey	106 ²	1	106	3.0	318	\$36.92	\$11,740.56
SCSEP subgrantee staff interview protocol	33 ³	1	33	2.0	66	\$36.92	\$2,436.72
SCSEP host agency interview protocol	13 ⁴	1	13	1.5	20	\$36.92	\$719.94
SCSEP grantee staff interview protocol	10 ⁵	1	10	1.5	15	\$36.92	\$553.80
SCSEP employer partner interview protocol	7 ⁶	1	7	1.0	7	\$36.92	\$258.44
SCSEP American Job Center partner interview protocol	13 ⁷	1	13	1.0	13	\$36.92	\$479.96
SCSEP community organization partner interview protocol	13 ⁸	1	13	1.0	13	\$36.92	\$479.96
SCSEP participant focus group protocol	19 ⁹	1	19	1.5	29	\$7.25	\$206.63
SCSEP participant interview guide	12 ¹⁰	1	12	0.5	6	\$7.25	\$43.50
Total	226		226		487		\$16,919.51

¹ For program staff and partners reflects the May 2021 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, 2022, “May 2021 National Occupational Employment and Wage Estimates United States.” For participants, mean hourly wage estimate is the national minimum wage.

² Assumes inclusion of all subgrantees of 19 national grantees.

³ Assumes interviews with 5 subgrantee staff in each of the 20 local sites of the national grantees.

⁴ Assumes interviews with 2 host agency staff (one leadership and one supervisory staff person) for each of the 20 local sites.

⁵ Assumes interviews with 2 grantee staff for 15 national grantees overseeing the 20 local sites.

⁶ Assumes interviews with 1 staff with employers in each of the 20 local sites.

⁷ Assumes interviews with 2 staff at American Job Centers in each of the 20 local sites.

⁸ Assumes interviews with 2 staff at community organization partners in each of the 20 local sites.

⁹ Assumes focus groups with 7 SCSEP participants in 8 local sites.

¹⁰ Assumes interviews with 3 SCSEP participants in 12 local sites.

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.

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 three years is \$1,456,345.80, and annualized cost to the federal government is \$485,448.60. Costs result from the following two categories:

- a. The annualized cost to the federal government for the evaluation contractor, the Urban Institute and its partner Capital Research Corporation (Contract Number: 1605C2-21-F-00029) to carry out this evaluation is \$464,783 (the total cost of the study over three years is \$1,394,349.)

- b. The annual cost borne by DOL for federal technical staff to oversee the contract is estimated to be \$20,665.60. 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-tables/pdf/2021/DCB.pdf>.) To account for fringe benefits and other overhead costs, the agency has applied multiplication factor of 1.6: $200 \text{ hours} \times \$64.58 \times 1.6 = \$20,665.60$.

The total annualized cost to the federal government is \$485,448.60.

\$464,783
+ \$20,665.60
= \$485,448.60 (\$485,449 rounded)

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 October 2022 and end July 2023. After data collection, analysis of the data will be done between August and October 2023. The final report draft will be written by December 2023. There will be a 2nd TWG meeting in February 2024 to receive feedback on the report. The first revision of the report will be in March 2024 and the 2nd revised final report (the final version) will be in June 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.