

Employment Processes as Barriers to Employment in the Lower-Wage Labor Market: *Interventions to Address Racial Bias*

Formative Data Collections for ACF Research

0970 – 0356

Supporting Statement

Part A

MAY2023

Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

Project Officer:
Megan Reid

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

Part A

Executive Summary

- **Type of Request:** This is a new information collection request under the umbrella generic, Formative Data Collections for ACF Research (0970-0356).

- **Description of Request:** The Office of Planning, Research, and Evaluation within the Administration for Children and Families at the U.S. Department of Health and Human Services launched the **Employment Processes as Barriers to Employment in the Lower-Wage Labor Market project (EPB Project)** to understand the many ways in which employment processes in hiring, promotion, and wage setting contribute to racial disparities in employment as a meaningful first step in improving racial equity in employment. The EPB project will systematically review how employment processes can perpetuate racial bias in employment and explore and identify strategies that hold promise in reducing racial biases in the low-wage labor market. As part of this project, ACF is proposing to conduct in-person and phone interviews with program staff, partners, employers, and workers involved with four promising interventions. A previous information collection request was approved in May 2022, for a related study for the EPB project, to conduct one-on-one semi-structured discussions with a range of project collaborators. We do not intend for this information to be used as the principal basis for public policy decisions.

- **Time Sensitivity:** The EPB project's final report will be completed and submitted to ACF by March 2024. It will not be a public report. We are seeking OMB approval by July 2023 to ensure that data collected from the site visits can be used to inform the final report.

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

A1. Necessity for Collection

Bias can affect the opportunities for workers of color in lower wage jobs at multiple points in employment processes, including how job openings are advertised, employer screening of applications to select interviewees, interviewing the candidate, the characteristics of the job into which a low-wage worker is hired (e.g., starting wage, hours, opportunities for advancement), performance review, and subsequent promotion decisions. The Office of Planning, Research, and Evaluation (OPRE) within the Administration for Children and Families (ACF) proposes to conduct site visits to organizations implementing interventions that seek to disrupt racial bias in the low-wage labor market. As part of this project, OPRE received approval under this umbrella generic in May 2022¹ to conduct one-on-one semi-structured discussions with a range of project collaborators to obtain perspectives on biases in employment processes and potential solutions to address those sources of bias. Through those discussions, as well as a literature review and field scan, the study team identified a range of possible approaches to addressing bias, and interventions that are implementing such approaches. This currently proposed information collection would be to conduct site visits to a subset of those interventions.

The purpose of conducting site visits is to gather details about a set of interventions being implemented that take varied approaches to address potential barriers and, in turn, to identify interventions that may be promising subjects for future study and provide details to inform options of how they might be studied—including what kinds of causal designs might be feasible. The site visits will add to OPRE’s understanding of interventions and mechanisms that interrupt bias identified through the literature review and engagement with collaborators and lived experience experts. The individuals at implementing organizations, and the employers, workers and other partners they work with, will describe the intervention or framework that they are implementing and how it potentially addresses racial bias. Discussions with organization staff, and others involved in implementing the interventions, are key to understanding how programs are approaching the problem of racial bias in low wage employment, which will inform future research in the field.

Approval for this collection is requested to help OPRE learn about approaches that intend to address and interrupt potential barriers to employment within employment processes for workers of color in the low-wage labor market. 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.

There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency. ACF has contracted with Abt Associates to complete this study.

A2. Purpose

Purpose and Use

The primary intent of the data collection is to contribute to ACF’s research agenda focused on programs that promote self-sufficiency of households with low incomes. The information from this data collection will be used to inform an internal report for ACF on priority questions for future research regarding racial barriers in employment processes and how to interrupt them, as well as methodological options to address those research questions.

¹ OMB #0970-0356; Title: Employment Processes as Barriers to Employment in the Lower-Wage Labor Market

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

If the data collection ends up producing pieces of information that seem to be of value to OPRE's external constituencies—such as other researchers or practitioners who work with populations that ACF serves—then it is possible that that information could be included in dissemination products tailored to those audiences. We do not foresee these dissemination products to be directly developed from this one information collection activity. Information from this activity may be incorporated into broader dissemination products.

Many individuals in households that have low incomes are people of color. To the extent that racially biased employment processes impede the ability of these individuals to obtain employment, maintain employment, and advance in their careers, those biased processes are also a barrier to ACF achieving its goals. Therefore, ACF is supporting data collection that will help the agency better understand the ways in which employment processes can be biased and possible strategies to address that bias.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for research and evaluation (0970-0356):

1. inform the development of ACF research
2. maintain a research agenda that is rigorous and relevant

Regarding the first goal, the information collected will help ACF identify promising strategies to combat bias in employment processes that could be subjects of future research to better understand how they function, how effective they are, and how they might be scaled to help more workers of color in low-wage jobs.

Regarding the second goal, the information collected will help ensure that ACF's research agenda is able to focus research questions on aspects of bias in low-wage labor markets that are most relevant and salient to workers, their employers, and programs that serve them—including ACF-funded programs.

Site visits will be to four programs implementing approaches that hold promise for reducing racial bias in employment processes. Site visitors will interview program managers, staff, partners, employers and workers in each site. The data collected will be used in conjunction with information extracted through the research team's literature review to identify anti-bias strategies that may be promising subjects for future research as well as information collected through a series of collaborator calls (OMB #0970-0356; ICR Ref. No. 202205-0970-015²).

The information collected is meant to contribute to the body of knowledge relevant to ACF programs, ACF program participants, and participants' employment outcomes. It is not intended to be used as the principal basis for a decision by a federal decision-maker and is not expected to meet the threshold of influential or highly influential scientific information. Further, the respondents will not be representative of the general population and will not be generalized to a broader population.

Research Questions

Site visit data collection will be guided by the following key research questions.

1. In what ways do respondents perceive that racial bias influences hiring, wage assignment, and promotion decisions in the low-wage labor market?

² Title: Employment Processes as Barriers to Employment in the Lower-Wage Labor Market

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

2. What potentially promising strategies are being implemented to actively address racial bias in employment processes in the low-wage labor market that employment and training programs may be able to use or promote?
3. What and who have been involved in implementing those approaches?
4. What challenges and successes have been experienced in implementing those bias-reduction approaches?
5. What lessons can be drawn from those experiences that may apply to future efforts to reduce racial bias in employment processes?
6. For approaches that are currently in practice, what is the current evidence base on their effectiveness or promise? What research is underway? What further research would be useful to fill knowledge gaps?
7. Based on our understanding of sources of racial bias in the low-wage labor market, what sources of bias are *not* being addressed? Why have programs opted to address some source of bias rather than others?
8. What contextual factors, such as broader labor market, political and social trends, do we need to know/understand that might affect the issue of employment bias and strategies intended to address it? For example, are certain strategies perceived to be more or less promising based on the tightness of the labor market? Or based on the current social climate as it relates to race?

Study Design

The site visit interviews will document local contexts, the intervention’s goals, the organizational structures and partnerships that support program implementation, implementation facilitators and barriers, and staff, employer, partner, and worker experiences. Data will be collected by a team of two to three researchers either in-person or virtually (depending on the intervention).

Discussion topics within each Discussion Guide will include a combination of the following, depending on the type of respondent:

- Organizational context
- Economic and political context surrounding the intervention
- Intervention goals and design
- Employers’ motivations, goals and experience
- Workers’ motivations, goals and experience
- Intervention design and implementation
- Reflections

<i>Instruments</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Instrument 1: Discussion Guide – Program managers, program staff, and partners	Respondents: One or more individuals from each of the following groups: program managers, program staff, and partners. Content: List of discussion topics that will be tailored to each site and individual (see the attached Discussion Guide and the bulleted topics provided in Section A.2). Purpose: Gain understanding of interventions and mechanisms that are being implemented in the low-wage labor market to disrupt biases.	Mode: In-person, video conference, telephone Duration: 60-90 minutes
Instrument 2: Discussion Guide	Respondents: One or more individuals from the employer category. Content: List of discussion topics that will be tailored to each site and	Mode: In-person, video conference,

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

- Employers	individual (see the attached Discussion Guide and the bulleted topics provided in Section A.2). Purpose: Gain understanding of employers' perspective on racial bias in the lower-wage labor market, and interventions and mechanisms that are being implemented in the low-wage labor market to disrupt biases.	telephone Duration: 60-90 minutes
Instrument 3: – Discussion Guide – Workers	Respondents: One or more individuals from the worker category. Content: List of discussion topics that will be tailored to each site and individual (see the attached Discussion Guide and the bulleted topics provided in Section A.2). Purpose: Gain understanding of workers' perspective on racial bias in the lower-wage labor market, and interventions and mechanisms that are being implemented in the low-wage labor market to disrupt biases.	Mode: In-person, video conference, telephone Duration: 60-90 minutes
Instrument 4: Interviewee Demographic Form	Respondents: All respondents. Content: Demographic information. Purpose: Allow the study team to analyze interviewees' perceptions and experience in the context of their identities, consistent with the study's focus on dynamics and manifestations of bias in employment processes.	Mode: paper, electronic Duration: 6 minutes

Other Data Sources and Uses of Information

The data collected from site visits will be used in conjunction with two other sources of information—the project's literature review and a series of collaborator calls³. The literature review identified common instances of bias within the low-wage labor market and hiring and employment practices and potential strategies to address bias. The research team conducted calls with collaborators to get a broad range of perspectives on the sources and nature of bias, including from employers, workers, representatives from the workforce system, worker advocates and software developers. The research team used the findings from the literature review and collaborator calls to develop the criteria for sites to visit for this more in-depth data collection. The study's final report, internal to ACF, will incorporate information from all three of these sources.

A3. Use of Information Technology to Reduce Burden

The Site Visit Discussions will generally be conducted in person, but we will use video conferencing technology or phone when in-person discussions cannot be arranged at an individuals' typical worksite or other convenient location. Using video conferencing reduces respondent burden by allowing the respondents to participate at a location and time that is most convenient for them. For in-person discussions we will use audio recording devices to reduce the need for follow-up.

A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

The data to be collected during the site visit discussions is not available from any other source. For example, it would be impossible to collect information on staff perceptions of program facilitators and barriers without obtaining it directly from those involved in program implementation. However, the team will verify with each site that information being requested is available only through the qualitative interviews that are proposed.

A5. Impact on Small Businesses

³ OMB #0970-0356; Title: Employment Processes as Barriers to Employment in the Lower-Wage Labor Market.

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

We anticipate that some of the sites may include employers and/or workers from small businesses. Discussions with all employers and workers will be arranged at a time and location, and using a mode that is convenient for the business. We will also utilize virtual data collection options as needed to reduce the time needed for travel.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

A7. Now subsumed under 2(b) above and 10 (below)

A8. Consultation

Federal Register Notice and Comments

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), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This first notice was published on November 3, 2020, Volume 85, Number 213, page 69627, and provided a sixty-day period for public comment. The second notice was published on January 11, 2021, Volume 86, Number 6, page 1978, and provided a thirty-day period for public comment. ACF did not receive any substantive comments.

Consultation with Experts Outside of the Study

In developing the data collection instruments and study design, the EPB Study team consulted with a small number of individuals with expertise in racial bias in employment processes in the low-wage labor market. To ensure equity and account for power differentials and marginalization across experts' ways of knowing, we sought input from two types of experts: those with lived experience (i.e., workers of color in the low-wage labor market) and research and practitioner experts. The lived experience and research experts provided input on the study's literature review. The lived experience and practice experts reviewed the study's memo on the proposed site selection process, and we anticipate requesting the lived experience experts' input on aspects of the data collection instruments after they are tailored by site. For these activities, the same information was not and will not be requested from more than 9 individuals.

A9. Tokens of Appreciation

For workers who participate in interviews, we propose providing a \$50 gift card for completing a semi-structured 75-minute interview (Instrument 3). Most of the respondents in the study 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, may 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. We believe \$50 is a reasonable amount to express appreciation to interviewees for their participation in these data collection activities. Under the project's

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

previous data collection under this generic clearance, a token of appreciation of \$35 was approved, which appeared to aid in recruitment. The slightly increased amount (\$50 as opposed to \$35) reflects the fact that interviews for this data collection are expected to be in-person, somewhat longer and that the set of respondents are a more narrowly defined (and smaller) group, which increases the recruitment challenges.

A10. Privacy: Procedures to protect privacy of information, while maximizing data sharing

Personally Identifiable Information

The study team will collect personally identifiable information including name, title, contact information, organization and affiliation, and gender. The purpose of collecting name, title, organization, contact information, and affiliation are for scheduling discussions with the respondents and for analyzing responses appropriately given respondents' organizational role. The purpose of collecting gender is to examine the experience and perception of racial bias that may differ by gender.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Assurances of Privacy

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. As specified in the contract, the research team will comply with all Federal and Departmental regulations for private information.

Data Security and Monitoring

The following privacy and data security measures will be in place to protect respondents' privacy, including any personally identifiable information collected about them:

1. All data, including portable media (e.g., voice/video recordings) and computerized files, are kept in secure areas.
2. All research staff will be trained on appropriate privacy and data security matters.

A11. Sensitive Information⁴

This data collection will ask in general terms about racial bias that respondents have experienced or observed and collect demographic information (Instrument 4). It will not involve collection of identifiable information about individuals involved in an instance of racial bias that respondents have experienced or observed. The data collection does not aim to document specific instances in detail, but to identify and understand ways in which bias occurs. Before beginning discussions, the research team will ensure that respondents understand that they can decline to respond to any questions that they do

⁴ Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities which indicate political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

not feel comfortable addressing. The interviewee demographic form will collect information on the respondent’s gender as prior research has found that racial disparities in employment outcomes vary by gender. In turn, the experience of racial bias is likely to differ by gender as well. The demographic information collected will be connected to responses, but not to names, and stored in a restricted file with study assigned identification numbers associated to each response.

A12. Burden

Explanation of Burden and Cost Estimates

Table A.12 shows the annual burden and cost of the data collection instruments and activities described in this ICR.

Each set of respondents brings a different perspective on bias in employment processes and strategies intended to address it. Program managers are responsible for designing and the overall oversight of programs that may address bias; staff are responsible for the day-to-day management of such programs. Program partners play different roles that supplement the services and programming developed by program managers. Employers participate in programs and oversee changes to their employment processes that come from participating in the programs. Workers may participate in programs or experience employment processes implemented by employers who participate. Employers and workers will also share their overall perceptions and experiences regarding racial bias in the lower-wage labor market.

The number of respondents was determined in an effort to balance available resources and the utility of the information collected.

The assumed wage rate is based on the May 2021 employment and wages from Occupational Employment Statistics survey from the Bureau of Labor Statistics (https://www.bls.gov/oes/current/oes_nat.htm), and was estimated with the following assumptions for occupations and industries:

- The rate for program managers and for partners, \$51.39, is based on the mean hourly wage for Management Occupations in Social Advocacy Organizations (SOC code 11-0000 (bls.gov)).
- The rate for individuals that are program staff, \$20.47, is based on the mean hourly wage for Office and Administrative Support Workers in Social Advocacy Organizations (SOC code 43-9199 (bls.gov)).
- The rate for employers, \$65.67 is based on a mean hourly wage for Human Resource Managers across industries (SOC code 11-3121, [Human Resources Managers \(bls.gov\)](https://www.bls.gov/oes/current/oes_nat.htm)).
- The rate for workers, \$21.88 per hour is based on the median “Usual Weekly Earnings” for workers who are high school graduates with no college, for the fourth quarter of 2022. <https://www.bls.gov/charts/usual-weekly-earnings/usual-weekly-earnings-over-time-by-education.htm>.

Table A.12: Estimated Annualized Burden and Cost to Respondents

Instruments	Type of	No. of	No. of	Avg.	Total/	Avg.	Total
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**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

	<i>Respondent</i>	<i>Respondents (total over request period)</i>	<i>Responses per Respondent (total over request period)</i>	<i>Burden per Response (in hours)</i>	<i>Annual Burden (in hours)</i>	<i>Hourly Wage Rate</i>	<i>Annual Respondent Cost</i>
Instrument 1: Discussion Guide	Program managers	8	1	1.5	12	\$51.39	\$616.68
Instrument 1: Discussion Guide	Program staff	8	1	1.5	12	\$20.47	\$245.64
Instrument 1: Discussion Guide	Partners	8	1	1	8	\$51.39	\$411.12
Instrument 2: Discussion Guide	Employers	24	1	1.5	36	\$65.67	\$2,364.12
Instrument 3: Discussion Guide	Workers	24	1	1.25	30	\$21.88	\$656.40
Instrument 4: Interviewee Demographic Form	All	72	1	.1	7.2	\$42.88	\$308.74
	Total	72	2	.73 (avg)	105.2	\$42.88 (avg)	\$4,602.70

Note: For program managers, staff and partners we estimate an average of two respondents at each of the four sites. For employers and workers, we estimate an average of six respondents per site. The count of total respondents equals double the sum of the cells in the column above it because each respondent responds to two instruments, one of Instruments 1, 2, or 3; plus Instrument 4. The average hourly wage for Instrument 4 is a weighted average of the hourly wages of each type of respondent listed in the preceding rows.

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

Table A.2 shows the estimated annual costs to the Federal government. The amount for Instrument Development and conducting site visits and interviews is \$146,000.

Table A.2: Estimated Annual Costs to Government

<i>Cost Category</i>	<i>Estimated Costs</i>
Conduct and Summarize Site Visit Interviews	\$146,000
Total/annual costs	\$146,000

A15. Reasons for changes in burden

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

This is for an individual information collection under the umbrella formative generic clearance for ACF research (0970-0356).

A16. Timeline

We expect data collection to take place over a four month period, following OMB approval. The table below summarizes the data collection timeline and the development of a report internal to ACF exploring questions for further study.

<i>Activity</i>	<i>Length of Activity</i>	<i>Timeframe Post OMB Approval</i>
Site visit interviews	4 months	Months 1-4
Reporting	8 months	Months 5-12

A17. Exceptions

No exceptions are necessary for this data collection.

Attachments

Instrument 1: Discussion Guide – Program managers, program staff, and partners

Instrument 2: Discussion Guide – Employers

Instrument 3: Discussion Guide – Workers

Instrument 4: Interviewee Demographic Form

Appendix A: Draft Site Visit Outreach Email

Appendix B: Project Description