

Justification for Non-Material Change to OMB 1290-0046

This memo requests a non-material change to the Paperwork Reduction Act (PRA) package previously approved by the Office of Management and Budget (OMB Control No. 1290-0046) for data collection for the Evaluating Registered Apprenticeship Initiative Study. These changes are requested as a result of the realization that increasing the Hubs site visit data collection by two sites and decreasing Youth/Pre-apprentice site visit data collection (category 2/3) by two sites would improve the Hubs Implementation Study while not hurting the Youth/Pre-apprenticeship Implementation Study, by allowing approximately half of each category (7 of 15 sites of Hub grantees and 10 of 19 of Youth/Pre-apprenticeship grantees) to be visited. This change would allow for more coverage of the Hub sites, as well as a deeper understanding of the capacity building and expansion strategies these grantees are using to expand apprenticeship.

Background

DOL and various industries have invested billions of dollars over the past decade to encourage, develop and expand industry-driven apprenticeship training nationwide. Further, through the Build Back Better (BBB) and Infrastructure Investment and Jobs Act (IIJA), the need for a coordinated national investment strategy for Registered Apprenticeship is critical to support the Administration's goals and priorities. The ABA grant program builds on the Department's previous and ongoing efforts to expand and modernize Registered Apprenticeship. DOL awarded the ABA grants in 2022, investing \$171 million to fund 39 grantees, including a focus on equity and partnerships as well as pre-apprenticeship activities. DOL's Chief Evaluation Office (CEO) has commissioned the Evaluating Registered Apprenticeship Initiatives Study (ERAI) with a goal of understanding the implementation of these recent investments in apprenticeship sponsored by the Department. At the time of the evaluation team's proposal including the number of site visits, DOL planned on awarding only \$121 million, funding grantees. Supplemental funding allowed \$50 million in additional awards and 9 more grantees.¹ The ICR was based on the original numbers of grantees proposed.

In January 2024, OMB approved the new information collection request (ICR) for 14 instruments to be used in the evaluation. These instruments included the ABA Youth Apprenticeship and Pre-Apprenticeship Grantee Staff Interview Protocol, ABA Youth Apprenticeship and Pre-Apprenticeship Partner/Employer Interview Protocol, ABA Registered Apprenticeship Hub Grantee Staff Interview Protocol, ABA Registered Apprenticeship Hub Partner Interview Protocol, and the ABA Registered Apprenticeship Hub Customer Interview Protocol. .

Change Requests

DOL requests minor changes to reduce the number of estimated respondent grantees in one category and increase the number of estimated respondent grantees in another category for data collection. The total burden to grantees will be unchanged. Specifically, the request is to change from 16 to 13 estimated ABA Youth Apprenticeship and Pre-Apprenticeship Grantee Staff Interview Protocol respondents, from 12 to 10 estimated ABA Youth Apprenticeship and Pre-Apprenticeship Partner/Employer Interview Protocol respondents, from 7 to 9 estimated ABA Registered Apprenticeship Hub Grantee Staff Interview Protocol respondents, from 7 to 9 estimated ABA Registered Apprenticeship

¹ <https://www.dol.gov/newsroom/releases/eta/eta20220824>

Hub Partner Interview Protocol respondents, and from 5 to 7 estimated ABA Registered Apprenticeship Hub Customer Interview Protocol respondents.

These requested non-substantive changes do not require any changes to the burden estimates. The field period for the grantee surveys will begin in November 2024 to March 2025.

An updated burden table with these changes is provided below:

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
ABA Youth Apprenticeship and Pre-Apprenticeship Grantee Survey	7 ²	1	7	3	21	38.13	800.73
ABA State Apprenticeship System Grantee Survey	2 ²	1	2	1	2	38.13	76.26
ABA Registered Apprenticeship Hub Grantee Survey	5 ²	1	5	1	5	38.13	190.65
ABA Pre-apprenticeship Participant Survey	334 ³	1	334	1	334	7.25	2,421.5
ABA Apprenticeship Survey	334 ³	1	334	1	334	7.25	2,421.5
ABA Participant Focus Group Protocol	27 ⁴	1	27	1.5	40.5	7.25	293.63
ABA Youth Apprenticeship and Pre-Apprenticeship Grantee Staff Interview Protocol	1613 ⁵	1	1613	1	1613	38.13	610.08 495.69
ABA Youth Apprenticeship and Pre-Apprenticeship Partner/Employer Interview Protocol	1210 ⁵	1	1210	1	1210	38.13	457.56 381.30
ABA State Apprenticeship System Grantee Staff/Partner Interview Protocol	10 ⁶	1	10	1	10	38.13	381.3
ABA State Apprenticeship System Employer Interview Protocol	4 ⁶	1	4	1	4	38.13	152.52
ABA Registered Apprenticeship Hub Grantee Staff Interview Protocol	79 ⁷	1	79	1	79	38.13	266.91 343.17
ABA Registered	79 ⁷	1	79	1	79	38.13	266.91

Apprenticeship Hub Partner Interview Protocol							343.17
ABA Registered Apprenticeship Hub Customer Interview Protocol	57 ⁷	1	57	.5	253.5	38.13	95.33 133.46
ABA Impact Evaluation Baseline Survey – participants	1,334 ⁸	1	1,334	0.33	440.2	7.25	3,191.45
Total	2,104	14	2,104	15.33	1,235.13	410.3	11,626.33

¹ Hourly wage for program staff and partners reflects the May 2022 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 2022 National Occupational Employment and Wage Estimates United States,” (accessed from the following web site as of May 1, 2023: https://www.bls.gov/oes/current/oes_nat.htm. For apprentices and pre-apprentices the hourly wage listed is the minimum wage.

² Assumes each of the ABA grantees is surveyed. Number of respondents per year are rounded to nearest whole unit.

³ This assumes that we survey roughly 3,000 apprentices and 3,000 pre-apprentices with a 33 percent response rate over three years.

⁴ Assumes 5 focus groups (one per state) in study 1 and 4 focus groups in study 2 over three years. Assumes a maximum of 9 participants per group over three years.

⁵ Assumes 10 grantees visited for study 2 and interview 4 program staff and 3 partners (including employers) per site over three years. Number of respondents per year are rounded to nearest whole unit.

⁶ Assumes 5 grantees visited for study 1 and interview 4 grantee staff and 2 partners (other than employers) and 2 employers interviewed over three years. Number of respondents per year are rounded to nearest whole unit.

⁷ Assumes 7 grantees visited for study 3 interviews with 4 grantee staff, 4 partners (including employers) and 3 customers total over three years. Number of respondents per year are rounded to nearest whole unit.

⁸ Assumes 1,334 participants randomized every year for three years. Number of respondents per year are rounded to nearest whole unit.