

Workforce Recruitment Program (WRP)

OMB CONTROL NO. 1230-0017

OMB Expiration Date: 9/30/2024

**SUPPORTING STATEMENT FOR
Workforce Recruitment Program (WRP)**

AGENCY: Office of Disability Employment Policy (ODEP), United States Department of Labor (DOL).

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This ICR seeks to obtain approval for a revision to an information collection currently in use - the Workforce Recruitment Program (WRP).

A. JUSTIFICATION

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 WRP is a recruitment and referral program that connects students with disabilities to an opportunity for employment. Through participating colleges and universities, WRP creates a database for Federal and select private-sector employers nationwide to find highly motivated college students and recent graduates with disabilities who are eager to demonstrate their abilities in the workplace through summer or permanent jobs. Candidates represent all majors, and range from college freshmen to graduate students and law students. Information from these candidates is compiled in a searchable database that is available through this website to Federal Human Resources Specialists, Equal Employment Opportunity Specialists, and other Federal employees and hiring officials in Federal agencies.

Every year, WRP staff approach more than 300 colleges and universities to participate in the WRP recruitment process for the year. WRP School Coordinators at these schools conduct outreach to their eligible students and encourage them to apply to participate in the WRP. School Coordinators must be college staff and are usually from the career or disability services office. Candidates that are approved by the School Coordinators and completed the application by the deadline are given the opportunity to have an elective informational interview with a trained volunteer WRP Recruiter from a Federal agency. To be eligible to register, candidates must be current, full-time, degree-seeking undergraduate or graduate students with a disability, or have graduated within two and a half years of the release of the database each December. Candidates must be U.S. citizens, must be attending or have graduated from a U.S. accredited college or university, and be eligible under the Schedule A Hiring Authority for persons

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with disabilities. Candidates must also be approved by a WRP School Coordinator to apply to WRP and participate in an interview.

Candidates are not interviewing for specific positions at specific agencies. They have the opportunity to have an elective informational interview with a Federal recruiter to learn about Federal service and discuss their career path. Candidates are not placed into jobs; they are simply applying to be part of a database of postsecondary students and recent graduates with disabilities that is made available to Federal employers directly and to the private sector through a contractor. Employers will then reach out to candidates directly if they are interested in interviewing or hiring them for a specific position. Candidates should be aware that WRP is not a guarantee of employment and not everyone who participates in WRP is contacted by employers.

Information collection instruments included in this package:

- WRP Applicant Referral Agreement
- WRP Student Registration Form
- WRP Schools Table
- WRP Student Application
- WRP Application Major and Minor List
- WRP Job Preference List

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.

WRP uses information entered by students for tracking purposes and to connect students with interested employers. Candidates are not placed into jobs; they are simply applying to be part of a database of postsecondary students and recent graduates with disabilities that is made available to Federal employers directly and to the private sector through a contractor. Employers will then reach out to candidates directly if they are interested in interviewing or hiring them for a specific position.

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.

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Registration and application are conducted entirely online, accessible through internet-connected devices.

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 A.2 above.

There is no existing information collection duplicative of this program to connect students with disabilities to employers.

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

This effort is not expected to impact small businesses or similar entities, as targeted respondents will be current or recent students with disabilities, not business entities.

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 information gathered from students with disabilities is necessary to connect them with available job opportunities at interested employers. Termination of this information collection would prevent WRP from continuing its operations.

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;**

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- 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 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 secret, 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 relating to the general requirements cited in 5 CFR 1320.5. This request fully complies with 5 CFR 1320.5.

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 *Federal Register* Notice was published on February 10, 2023 (88 FR 8913), to allow for public comments. No public comments were received. A copy of this notice is included in this package.

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.

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As part of [Executive Order 14035 on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce](#), the Departments of Labor and Defense were asked to produce a report to the Assistant to the President on ways to expand and strengthen the Workforce Recruitment Program (WRP) and its job opportunities. As part of producing that report, ODEP collected feedback through a publicized email during fall 2021 from Federal Government employees about ways to expand the program. In addition, the WRP team regularly holds conversations with federal employers as part of webinars and through phone calls and emails, during which employers ask questions and share feedback about the program. Many of the suggested changes to the WRP application were conveyed to WRP staff through these mediums. Questions and feedback from students and School Coordinators contributed to clarifying some of the instructions in the application as well. ODEP staff also consulted with the Office of the Solicitor and reviewed the [Measuring Sex, Gender Identity and Sexual Orientation Report](#) produced by the Sexual and Gender Minority Research Office (SGMRO) at the National Institutes of Health when making changes to some of the demographics questions that are part of the application.

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.

ODEP consulted with three internal and external representatives to the agency involved in requesting WRP. The consultation asked ODEP contacts for their feedback on burden estimates for information collection activities associated with requesting a WRP application. None of the three representatives had any changes or comments on the estimated burden, so ODEP is proceeding with the initial estimates published in the 60-day notice. The individuals/organizations consulted about the information collection are listed in the table below.

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Table 1: List of Agency Representatives

Contact	Organization	Email	Phone
Lauren Karas	ODEP	Karas.Lauren.E@DOL.GOV	(202) 693-4934
Miranda Lange	ODEP	Lange.Miranda@DOL.GOV	(646) 264-5042
Frances Vhay	ODEP	Vhay.Frances.J@DOL.GOV	(202) 693-7863

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

There are no payments or gifts to respondents.

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

Informed consent is obtained from students registering with WRP. A privacy policy details the restriction of information obtained by WRP to its intended purpose, as well as the protection of information consistent with the Privacy Act, the e-Government Act of 2002, the Federal Records Act, and as applicable the Freedom of Information Act.

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 questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **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**

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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.**
- **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 in Item 14.**

The table below provides the number of respondents, frequency of response per respondents, and total number of responses for the combined registration, application, and interview, which are expected to total approximately one hour per respondent. It is expected that WRP will process approximately 2,500 student applicants per year.

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate*	Total Burden Cost
Year One	2,500	1	2,500	1	2,500	\$29.76	\$74,400
Year Two	2,500	1	2,500	1	2,500	\$29.76	\$74,400
Year Three	2,500	1	2,500	1	2,500	\$29.76	\$74,400
Three-Year Annualized	2,500	1	2,500	1	2,500	\$29.76	\$74,400

* This is the hourly mean wage across all occupations based on the May 2022 Occupational Employment Statistics, https://www.bls.gov/oes/current/oes_nat.htm.

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13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

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 service 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 collection 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 is no cost burden to respondents.

14. Provide estimates of the annualized cost 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), any other expense that would

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not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

The estimated annual cost to the Federal Government from this information collection is \$860,530.

15. Explain the reasons for any program changes or adjustments.

As part of [Executive Order 14035 on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce](#), the Departments of Labor and Defense were asked to produce a report to the Assistant to the President on ways to expand and strengthen the Workforce Recruitment Program (WRP) and its job opportunities. As part of producing that report, ODEP collected feedback through a publicized email during fall 2021 from Federal Government employees about ways to expand the program. In addition, the WRP team regularly holds conversations with federal employers as part of webinars and through phone calls and emails, during which employers ask questions and share feedback about the program. Many of the suggested changes to the WRP application were conveyed to WRP staff through these mediums. Questions and feedback from students and School Coordinators contributed to clarifying some of the instructions in the application as well. ODEP staff also consulted with the Office of the Solicitor and reviewed the [Measuring Sex, Gender Identity and Sexual Orientation Report](#) produced by the Sexual and Gender Minority Research Office (SGMRO) at the National Institutes of Health when making changes to some of the demographics questions that are part of the application.

16. For collections of information whose results will be published, outline plans for tabulations, 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.

No results will be published from this project, and no analysis will be conducted. This information collection exists as a means of individually connecting students with disabilities to job opportunities at interested employers.

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 instrument will display the OMB expiration date.

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18. Explain each exception to the certification statement.

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for this collection.