

**SUPPORTING STATEMENT FOR
EVALUATING REGISTERED APPRENTICESHIP INITIATIVE STUDY**

OMB CONTROL NO. 1290-0NEW

This is a new information collection request.

A. JUSTIFICATION

The US Department of Labor (DOL) Chief Evaluation Office (CEO), in collaboration with DOL Employment and Training Administration (ETA) funded the Evaluating Registered Apprenticeship Initiatives Study (ERAI) with a goal of understanding the implementation of these recent investments in apprenticeship sponsored by the Department. The purpose of the project is three-fold:

- (1) Design and conduct analyses that add to the evidence base on apprenticeship strategies and models through an evaluation of the Apprenticeship Building American (ABA) grants.
- (2) Conduct an impact and cost-benefit evaluability assessment of pre-registered apprenticeship programs that lead to registered apprenticeship programs (RAPs).
- (3) Coordinate across the portfolio of apprenticeship projects at CEO and beyond to facilitate sharing of findings, methods, and learning about apprenticeship broadly across research teams.

DOL's CEO contracted with Urban Institute and its partners, Mathematica, and Social Policy Research Associates to conduct the study of these efforts. The ERAI will address the first purpose above by conducting three implementation studies:

- (1) Implementation study of the ABA State Apprenticeship System Building and Modernization grants
- (2) Implementation study of the ABA Expansion of RAP Opportunities for Youth grants and ABA Ensuring Equitable RAP Pathways through Pre-Apprenticeship Leading to RAP enrollment and Equity Partnerships grants (referred to as the ABA Youth Apprenticeship and Pre-Apprenticeship grants).
- (3) Implementation study of ABA Registered Apprenticeship Hubs grants

This is a **new collection** request associated with the ERAI. This package requests clearance from 14 data collection activities which need to start in February 2024. A timely start to the information collection is critical for conducting the study. The 14 data collection instruments are:

1. ABA Youth Apprenticeship and Pre-apprenticeship Grantee Survey
2. ABA State Apprenticeship System Grantee Survey
3. ABA Registered Apprenticeship Hub Grantee Survey
4. ABA Pre-apprenticeship Participant Survey
5. ABA Apprenticeship Survey

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6. ABA Participant Focus Group Protocol
7. ABA Youth Apprenticeship and Pre-apprenticeship Grantee Staff Interview Protocol
8. ABA Youth Apprenticeship and Pre-apprenticeship Partner/Employer Interview Protocol
9. ABA State Apprenticeship System Grantee Staff/Partner Interview Protocol
10. ABA State Apprenticeship System Employer Interview Protocol
11. ABA Registered Apprenticeship Hub Grantee Staff Interview Protocol
12. ABA Registered Apprenticeship Hub Partner Interview Protocol
13. ABA Registered Apprenticeship Hub Grantee Customer Interview Protocol
14. ABA Impact Evaluation Baseline Survey - participants

DOL will submit additional requests for future data collection for the overall study.

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.

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 through expanding the number of programs and apprentices, diversifying the industries that utilize Registered Apprenticeship, and increasing access to and completion of RAPs for underrepresented populations and underserved communities.

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.¹ The ABA grants advance DOL’s efforts “to expand, diversify and modernize registered apprenticeship by increasing the number of programs and apprentices, diversifying the industries that use the “earn-as-you-learn” model for workforce development, and improving the access and performance of the programs in underrepresented and underserved communities.”² The awards ranged from \$2 million to \$8 million over a five-year grant period.

Funding was awarded in four categories:

- (1) State Apprenticeship System Building and Modernization (\$18.6 million)

¹ On July 7, 2022, DOL announced an initial set of ABA grant awards totaling \$121.8 million. Six of the awards went to organizations to lead Registered Apprenticeship Hubs that “facilitate the establishment, scaling, and expansion of Registered Apprenticeship Programs in new and fast-growing industries and occupations.” On August 24, 2022, DOL announced an additional set of 9 Hub grant awards, totaling \$50 million. For more information, see the two news releases at <https://www.dol.gov/newsroom/releases/eta>.

² Employment and Training Administration, News Release, August 24, 2022. <https://www.dol.gov/newsroom/releases/eta/eta20220824>

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- (2) Expansion of registered apprenticeship Program Opportunities for Youth (\$29.9 million)
- (3) Ensuring Equitable RAP Pathways through Pre-Apprenticeship Leading to RAP enrollment and Equity Partnerships (\$35 million)
- (4) Registered apprenticeship Hubs to help employers design, develop, and deliver RAPs and facilitate the establishment, scaling, and expansion of RAPs (\$88.3 million)

Grant funds are authorized by the National Apprenticeship Act for the Apprenticeship Building America (ABA) grant program.

Although the evidence base on apprenticeship in the U.S. is growing, there are still several key knowledge gaps that are ripe for rigorous evaluations and evidence-building. Policymakers, researchers, evaluators, and practitioners are generally persuaded that apprenticeship has positive net benefits, but the study is needed to build more evidence on how states can build sustainable apprenticeship infrastructure; how to broaden access to and success of youth in apprenticeship; how pre-apprenticeship is being used to increase access to and outcomes of registered apprenticeship; and how hub intermediaries can be most effectively employed to increase the number of apprenticeships and apprentices. Impact analysis of the pre-apprenticeships in ABA is needed to better understand what role pre-apprenticeship plays in improving access to and outcomes of registered apprenticeship, especially for those groups traditionally underrepresented in apprenticeship.

This a **new collection** request associated with ERAI. This package requests clearance for 14 data collection activities which need to start in February 2024. Given that the grantees are already beginning to enroll participants, a timely start to the information collection is critical for conducting the evaluations.

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:

- (1) An implementation study of strategies for state apprenticeship system building and modernization
- (2) An implementation study of strategies to expand opportunities for youth served by registered apprenticeship programs and strategies for equitable apprenticeship pathways through pre-apprenticeships leading to a registered apprenticeship
- (3) An implementation study of registered apprenticeship hubs
- (4) An impact and cost-benefit evaluability assessment of pre-apprenticeship programs that lead to registered apprenticeship programs.

Each study will address the following research questions and use the instrument identified

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above by number shown is Table A.1.:

Table A.1. Research Questions

Research question	Instruments Used (Identified by Number)
Study 1. State Apprenticeship Expansion and Modernization	
1. In what ways did grantees expand registered apprenticeships? What was the planning process states used to prioritize objectives and modernize systems?	2, 9, 10
2. What strategies did grantees use to develop the pipeline of potential apprentices, including pre-apprenticeship programs and other strategies to broaden interest in apprenticeship?	2, 6, 9, 10
3. To what extent did grantees focus on expanding registered apprenticeships in emerging or nontraditional industries and/or expanding opportunities for underrepresented populations in traditional industries for apprenticeship? How did grantees determine their priorities across focal industries and populations?	2, 9, 10
4. What strategies did grantees use to increase equity in access to RAPs? How did grantees perceive differences in strategies affecting gaps, barriers, and opportunities?	2, 6, 9, 10
5. What are promising strategies from stakeholder perspectives that merit bringing to scale?	6, 9, 10
6. What types of state-level system changes were associated with grantee efforts to build their capacity to expand apprenticeships?	2, 9
7. How did grantees leverage, develop, or modernize data systems to improve performance or accountability of apprenticeship programs, improve knowledge of the costs and benefits of apprenticeship, or make it easier to develop apprenticeship programs?	9, 10
8. How do differences in state structures appear to affect how grant funds were implemented, such as federal versus state-level registration models, state apprenticeship offices, and state-level legislative supports?	9
9. How did grantees leverage the Workforce Innovation and Opportunity Act and their state's workforce development system to further the goals of their grants?	9, 10
10. What do grantees still perceive as gaps in the capacity of state systems to support apprenticeship that could be filled with further assistance?	2, 9
11. What types of national, state, local partners did grantees work with to meet the goals of the grant? What were the roles and responsibilities of these partners and how did they contribute to meeting the goals of the grant?	2, 9, 10
Study 2. Youth Apprenticeship and Pre-Apprenticeship	
1. What are the components of existing models of pre-apprenticeship programs? How do the components of pre-apprenticeship programs funded under this grant program differ from other existing pre-apprenticeship programs?	1, 7
2. How do the goals and intended outcomes of pre-apprenticeship programs vary? What are participant goals?	1, 4, 5, 6, 7, 8

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Research question	Instruments Used (Identified by Number)
3. What strategies did grantees use to implement pre-apprenticeship programs? Which strategies were reported to be most successful? What do grantees and partners perceive as the elements of a quality pre-apprenticeship program?	1, 4, 7, 8
4. What strategies do grantees and partners perceive as effective in growing the number of pre-apprenticeship programs, with a focus on pre-apprenticeship opportunities that articulate to RAPs as part of a career pathway? Among those that articulate to RAPs, what are the different articulation strategies and what do grantees, partners, and participants perceive as effective strategies?	1, 4, 5, 7
5. What types of partners did grantees work with toward meeting the goals of the grant? What were the roles and responsibilities of these partners and how did they contribute toward the goals of the grant? What resources did the grantee provide to partners?	1, 7, 8
6. What do grantees and partners perceive as some promising practices for working with industries/sectors, types of employers (such as large or small businesses), and other key stakeholders? How were regional workforce systems and partnerships developed and maintained? How does this compare with prior apprenticeship studies?	1, 7, 8
7. What are the completion rates and wages for participants in apprenticeship and pre-apprenticeship programs? How do these completion rates and wages differ by various subgroups, including underrepresented populations?	1, 4, 5, 6, 7, 8
8. In what ways did grantees expand and/or create new registered apprenticeship and pre-apprenticeship programs for youth?	1, 7, 8
9. What strategies do different stakeholders perceive as being effective in increasing the participation of youth (16-24) in RAPs and pre-apprenticeship programs that lead to RAPs? What strategies led to participation of pre-apprentices and apprentices?	1, 4, 5, 6, 7
Study 3: Registered Apprenticeship Hubs	
1. How did grantees structure the Hubs? What were the roles of grantees and how did they change over time? How did the structures differ across grantees? What were grantees' and partners' perceptions of the "Hub" as an intermediary model to support RAP expansion? What did they perceive to be the benefits and challenges? What were grantees' and partners' plans to sustain the Hub after the grant?	3, 11, 12
2. What was the planning process grantees used to prioritize goals, objectives, and types of industries? How were partners involved? How did the planning process differ across grantees? What did grantees and partners think worked well in the planning process and what would they improve?	11,12
3. How were the Hubs' partner networks developed? What were partners' roles within this network? How did the partnerships change over time? What partnership strategies appeared to support rapid development, scaling, and deployment of RAPs?	3, 11, 12
4. How did grantees coordinate and leverage efforts across all of the ABA-funded Hubs? What did grantees perceive to be the benefits and challenges of this coordination?	11, 12
5. What strategies did the grantees use in engaging with industry and employers? How did the strategies change over time? What roles did industry and employers play in meeting the goals of the grant? How did grantees and their partners deploy employer incentives? What were grantees' and partners' perceptions of the incentives and their ability to help support RAP expansion?	3, 11, 12

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6. What types of RAPs (including pre-apprenticeship) did the Hubs successfully help to develop and launch? What are grantees' and partners' perceptions of promising strategies that merit bringing to scale? What were their perceptions of the challenges to reaching and working with employers and industry?	3, 11, 12
7. What strategies did grantees use to advance equity in apprenticeship? How did the strategies change over time? To what extent, according to grantees and partners, did Hubs advance equity in both traditional and new and emerging sectors and occupations? What were grantees' and partners' perceptions of promising strategies that merit bringing to scale? What were the challenges to advancing equity in apprenticeship?	3, 11, 12
8. To what extent did grantees and partners build capacity in the registered apprenticeship system to expand RAPs? How did they build this capacity? What were the grantees' and partners' perceptions of the changes in the registered apprenticeship ecosystem served that resulted from the Hubs' efforts to build the capacity for expanding RAPs?	3, 11, 12
9. What strategies did Hubs use to promote TA services to the field? How did the strategies change over time? Who were the desired and actual "customers" of the TA services? To what extent did grantees and partners perceive that those strategies increased utilization of Hub services?	3, 11, 12, 13
10. What TA activities did Hubs engage in to help bolster or expand registered apprenticeships? How did this change over time? What are grantees' and partners' perceptions of promising strategies that merit bringing to scale?	3, 11, 12, 13
11. In what ways were the Hubs' TA activities and services perceived to help customers in the field? What TA services were not considered by Hub partners as successful at supporting customers and why? What did customers perceive to be the benefits and challenges of the TA? What were the promising practices for providing TA?	11, 12, 13

The evidence generated by the evaluation will be relevant not only to the ABA grantees and their partners participating in the DOL initiatives, but to DOL policymakers and administrators assessing current and future apprenticeship initiatives, and to employers, training institutions and workforce development partners seeking knowledge and evidence about effective strategies and models, practices, and partnerships to improve and expand registered apprenticeships.

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 A.2 above.

ABA is a new grant program of DOL. The data collection described here is to understand the inaugural cohort. All 14 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 ABA grantee partners could be small organizations, such as businesses or nonprofit organizations. If small businesses or organizations 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 ABA grantees are currently implementing the program on the ground; what strategies grantees are employing that have potential to improve this program and future similar programs; 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 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 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.

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.

1. Federal Register announcement

The 60-day notice to solicit public comments was published in the Federal Register on May 4, 2023.

2. Consultation outside of the agency

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.2. They have expertise in research methodology as well as on programs and populations similar to those being served in each ABA grant category.

Table A.2. Technical Working Group

Alex Camardelle

Vice President of Policy and Research, Atlanta Wealth Building Initiative

Carolyn J. Heinrich

Professor of Public Policy and Education, Vanderbilt University.

Kevin Hollenbeck

Consultant, Former VP, W.E. Upjohn Institute for Employment Research.

Maura Kelly

Professor, Sociology Department, Portland State University

Christopher Maclarion

Director of Apprenticeship and Training, Maryland Department of Labor

Lul Tesfai

Director Program Development, Irvine Foundation

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

Apprentices participating in the participant focus groups will receive a \$50 gift card. Apprentices and pre-apprentices responding to the survey will receive a \$25 gift card.

10. Describe any assurance of confidentiality 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 and has reviewed and approved the activities herein.

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 complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, 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 data collection for these activities is estimated to take place over three years, with the annualized cost to respondents for each activity shown in Table A.3.

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Table A.3. 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
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	41	7.25	\$293.63
ABA Youth Apprenticeship and Pre-Apprenticeship Grantee Staff Interview Protocol	16 ⁵	1	16	1	16	38.13	\$610.08
ABA Youth Apprenticeship and Pre-Apprenticeship Partner/Employer Interview Protocol	12 ⁵	1	12	1	12	38.13	\$457.56
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	7 ⁷	1	7	1	7	38.13	\$266.91
ABA Registered Apprenticeship Hub Partner Interview Protocol	7 ⁷	1	7	1	7	38.13	\$266.91
ABA Registered Apprenticeship Hub Customer Interview Protocol	5 ⁷	1	5	.5	3	38.13	\$95.33

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ABA Impact Evaluation Baseline Survey – participants	1,334 ⁸	1	1,334	0.33	440	7.25	\$3,191.45
Total	2,104		2,104		1,236		\$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 12 grantees visited for study 2 and interview 4 program staff and 3 partners (including employers) per site over three years.

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 5 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.

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 are no direct costs 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 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 total cost to the Federal government over three years is \$2,662,584, and annualized cost to the federal government is \$887,528. Costs result from the following two categories:

- a. The annualized cost to the federal government for the evaluation contractor, the Urban Institute and its partners Mathematica and Social Policy Associates (Contract Number: DOL #1605DC-18-A-0032/1605C2-21-F-00029, to carry out this evaluation is \$874,800³.
- b. The annualized cost for federal technical staff to oversee the evaluation is \$12,728. This is calculated by the following: an annual level of effort of 200 hours for one Washington, DC-based Federal GS-14 step 1 employee earning \$63.64 per hour. (See Office of Personnel Management 2023 Hourly Salary Table at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf>) Therefore, the annualized cost is 200 hours x \$63.64= \$12,728.

The total annualized cost to the federal government is \$887,528 (\$874,800 + \$12,728).

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

This is a new information collection.

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.

³ The total contractor cost includes the cost for \$50 gift cards paid to focus group participants and the \$25 paid to apprentice and pre-apprentice survey respondents.

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Data collection will begin in February 2024 and will end in March 2026. After data collection, data will be presented in summary formats, tables, charts, and graphs to illustrate the results. Several briefs will be developed based on interim findings in 2023, 2025, and 2026. Three final reports (one for each study) and accompanying summary briefs will be submitted in fall 2026.

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 Control Number and expiration date will be displayed on all forms completed as part of the data collection.

18. Explain each exception to the certification statement.

No exceptions are necessary for this information collection.