

Formative Data Collections for DOL Research

OMB Information Collection Request 1290 – 0NEW

Supporting Statement

Part A

- The goal of this generic ICR is to conduct formative studies to inform DOL research and evaluation.
- The intended use of the resulting data is to improve internal decisions regarding DOL’s research, and evaluation. We may share information resulting from these data collections in the following ways:
 - Research design documents or reports; research or technical assistance plans; background materials for technical workgroups; concept maps, process maps, or conceptual frameworks; contextualization of research findings from a follow-up data collection that has full PRA approval; or informational reports to Technical Assistance (TA) providers. In sharing findings, we will describe the study methods and limitations with regard to generalizability and as a basis for policy.
- These formative studies will collect data using well-established methodologies including: semi-structured and in-depth qualitative interviews; focus groups; direct observations; document analysis; and structured surveys.
- The populations to be studied include key stakeholder groups involved in DOL projects and programs, state or local government officials, service providers, participants in DOL programs or similar comparison groups, experts in fields pertaining to DOL research and programs, or others involved in conducting DOL research or evaluation projects.
- Data will be analyzed using well-established qualitative analysis methods, such as coding interviews for themes. Structured response surveys will be analyzed using descriptive statistics and other appropriate statistical methods.

This is a new information collection request.

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 Chief Evaluation Office (CEO), U.S. Department of Labor (DOL), seeks approval of this generic clearance to allow DOL to conduct a variety of formative data collections. We anticipate the majority of data collections that fall under this generic request to come from CEO, but program offices will also have access to this resource when they are pursuing research and evaluation. All proposed collections will be reviewed by and submitted through CEO.

DOL programs promote the welfare of the wage earners, job seekers, and retirees of the United States; improve working conditions; advance opportunities for profitable employment; and assure work-related benefits and rights. CEO studies DOL programs, and the populations they

serve, through rigorous research and evaluation projects. These include evaluations of existing programs, evaluations of innovative approaches to helping wage earners, job seekers, and workers, research syntheses, and descriptive and exploratory studies. CEO's research offers further understanding of current programs and service populations, explores options for program improvement, and assesses alternative policy and program designs. CEO works closely with all offices and agencies throughout DOL to develop and implement evaluations that address priorities set by the Secretary and the agencies.

CEO's research and evaluations are 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))."

Under this generic clearance, DOL would engage in a variety of formative data collections with researchers, practitioners, Technical Assistance (TA) providers, service providers and potential participants throughout the field to fulfill the following goals: (1) inform the development of DOL research, (2) maintain a research agenda that is rigorous and relevant, (3) ensure that research products are as current as possible and (4) inform the provision of technical assistance. DOL envisions using a variety of techniques including semi-structured discussions, focus groups, surveys, and telephone or in-person interviews, in order to reach these goals.

Under this generic clearance, DOL seeks approval to collect information from more than 9 respondents that can inform and support future and current research but that are not highly systematic or intended to be statistically representative or otherwise generalizable. The general methods proposed for coverage by this clearance are described in this justification package. Also outlined are the proposed procedures for keeping OMB informed about the various types of data collections, and the nature of the research activities being conducted.

Study Background

This generic clearance follows after the generic clearance for formative research for Administration for Children and Families (OMB No. 0970-0356).

Following standard Office of Management and Budget (OMB) requirements, DOL will submit to OMB information about individual information collection activities proposed under the generic clearance. DOL/CEO will provide OMB with a copy of the individual instruments or questionnaires, as well as other materials describing the project.

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.

Overview of Purpose and Approach

All of the methods and the data collections approved under this clearance will be used for the purposes of informing CEO's and DOL's internal decision-making, technical assistance, research planning, and contextualization of research findings. These formative information collections help ensure DOL develops and implements necessary and effective research and evaluation studies.

Under this umbrella generic information collection (GenIC) request, information will not be collected with the primary purpose of publication, but findings are meant to inform DOL activities and may be incorporated into documents or presentations that are made public. See section A16 for additional information.

The specific types of information gathering methods included under the umbrella of this clearance are varied. DOL will submit individual GenIC requests under this clearance, which will include:

- A full Supporting Statement A and Supporting Statement B, to include the following:
 - Intended use of the information collection.
 - Demonstration of the fitness of purpose between the proposed collection and its intended use.
 - Specific population of focus.
 - Contextual information about the study, including any potential barriers or facilitators.
 - Description of the qualitative analytic method(s) used including the strengths and limitations of the method(s) for the purpose of the study.
 - Information about how outcomes will be communicated and shared.
 - Notification that the data collection is for internal program purposes only; it is not meant to provide policy recommendations and the findings are not meant to be generalizable. Any plans for sharing information (as described in A16) will be clearly detailed.
- All instruments, protocols, and other supplementary materials.

DOL understands that OMB will make every effort to review materials for individual generic information collection requests ***within 10 working days*** of submission.

DOL will make separate submissions for clearance of full, non-developmental data collection efforts.

DOL will provide a report summarizing the number of hours used, as well as the nature and results of the activities completed under this clearance with subsequent overarching generic information collection renewals.

Study Design and Universe of Data Collection Efforts

Under this clearance, DOL will use a variety of approaches. The exact data collection methods and the samples for each Generic Information Collection will depend on the project. The particular samples will vary based on the content of the discussion and the programs or policies of interest. These formative studies will collect data using well-established methodologies, including:

- **Semi-structured discussions or conference calls:** Semi-structured discussions or conference calls with multiple participants are conversations between researchers and one or more informants around a series of topics, potentially including probing questions and follow-up questions. Unlike a structured survey, where the interview follows a prescribed set of questions or a script, semi-structured discussions are designed to be more flexible and responsive to the direction of the conversations prompted by the respondent's comments. Semi-structured discussions are useful because they allow for an interactive approach to information gathering, while maintaining some consistency across respondents.
- **Focus groups:** This method involves group sessions guided by a moderator who follows a topical outline containing questions or topics focused on a particular issue, rather than adhering to a standardized questionnaire. Focus groups can be more efficient than individual interviews, since multiple individuals participate at one time. In addition, the group dynamics can yield richer responses than individual interviews for some types of topics.
- **Telephone or in-person interviews:** Interviews are one of the oldest and most widely used methods of data collection. Typically structured around a prescribed set of questions, interviews can be done over the phone or face-to-face. With technological advances, telephone interviews have become an efficient source of systematic data collection.
- **Questionnaires/Surveys:** Questionnaires are common and popular tools to gather data from multiple people. Information from a questionnaire can inform research and evaluation planning. Questionnaires may be used to gather information about specific programs or populations served by DOL (i.e., program processes, needs assessments, cost workbooks, etc.).
- **Direct Observation:** Direct observation yields detailed descriptions of the activities, actions, and behaviors of individuals; interpersonal interactions; settings; and organizational processes and procedures. Unless observation includes direct involvement

from the observed individuals, these activities will be described in the justification package but will not be included in the estimated burden for a GenIC¹.

Respondents could include key stakeholder groups involved in DOL projects and programs, state or local government officials, service providers, participants in DOL programs or similar comparison groups; experts in fields pertaining to DOL research and programs, or others involved in conducting DOL research or evaluation projects.

- 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.**

DOL and its contractors will employ information technology as appropriate to reduce the burden of respondents who agree to participate. We will provide specific information about the use of technology for each individual GenIC.

- 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.**

This research will not duplicate any other work being done by DOL. DOL program offices collaborate regularly and will continue to collaborate to prevent any duplication of information collection efforts. The purpose of this clearance is to better inform and improve the quality of DOL's research and evaluation. Data gathering under this request would not be feasible without this generic clearance due to the time constraints of seeking clearance for each individual data collection. To the maximum extent possible, we will make use of existing data sources before we attempt to utilize the additional fieldwork sought under this clearance. These efforts will be described in each individual GenIC.

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

The research to be completed under this clearance is not expected to impact small businesses. If an individual collection involves small organizations, the justification package will include a discussion to address this involvement.

¹ Per 44 USC, 5 CFR 1320.3: Definitions: ... **“Information” does not generally include items in the following categories...**(3) Facts or opinions obtained through **direct observation** by an employee or agent of the sponsoring agency or through nonstandardized oral communication in connection with such direct observations. . . .” (emphasis added).

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.

DOL anticipates that all of the information collected under this generic clearance will involve a one-time data collection. If this project were not carried out, the quality of the research and its relevance to public policy and practitioner concerns among a variety of projects would likely suffer.

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 confidentially to the extent permitted by law.**

There are no special circumstances for the proposed data collection efforts.

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.

Federal Register Notice and Comments

The 60-day notice to solicit public comments was published in the Federal Register on March 8, 2021 (86 FR 13401). During the notice and comment period, no comment was received.

Consultation with Experts Outside of the Study

Consultation with staff from DOL contractors carrying out research and evaluation surveys will occur in preparation for and in conjunction with the fielding of the data collections under this request. Relevant information about consultations will be included with each GenIC request.

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

Per OMB guidance, incentives are generally not appropriate for contractors, cooperators, grantees or program participants because they already have a pre-existing relationship with the agency. Incentives are most appropriate where participants are being asked to travel to a site to participate in a focus group or cognitive interview. Incentives are generally not appropriate for questionnaires/surveys.

If an incentive is proposed, a detailed justification based on the type of collection, population of respondents, and other circumstances will be provided in the individual information collection request. Per the Office of Information and Regulatory Affairs, Office of Management and Budget guidance document *Questions and Answers when Designing Surveys for Information Collections* (Updated Oct. 2016)², justifications will focus on data quality, burden on the

² https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/pmc_survey_guidance_2006.pdf

respondent, past experience, improved coverage of specialized respondents, rare groups, or minority populations; reduced survey costs; and/or equity.

Each justification will cite the research literature that demonstrates significant improvements in response rates and non-response bias when applied to similar participants, data collection methods, and data collection contexts. OMB does not consider it appropriate to use private sector market rates as a justification for incentives in government information collections. Where no evidence is available, DOL may propose a field test or experiment to evaluate the effects of the incentive.

The following includes expected ceiling amounts for different types of collections:

- Focus groups where participants are expected to travel to a central site: Up to \$75
- Cognitive Interviews or similar exercises (intensive one-on-one probing of basis for thoughts) in which participants are expected to travel to a central site: Up to \$40
- Questionnaires/Surveys: TBD, under special circumstances

For any collection over 90 minutes, participants may be offered an incentive to account for incidental expenses (transportation, child care, lost wages, etc.).

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

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.

Individual statements will be included with each generic information collection request submitted under this clearance, but in general, the contractor performing the data collection shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The contractor shall ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements. Any specific pledges evaluation staff must sign, as required by the contractor, will be described in individual GenIC requests.

As necessary, the contractor shall use Federal Information Processing Standard (currently, FIPS 140-2) compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. The contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The contractor shall: ensure that this standard is incorporated into the contractor's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile

devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology requirements and other applicable Federal and Departmental regulations. In addition, the contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or personally identifiable information that ensures secure storage and limits on access.

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

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.

Most of the questions that will be included in these activities will not be of a sensitive nature. However, it is possible that some potentially sensitive questions may be included under this clearance. For proposed collections that include questions of a sensitive nature, DOL will provide a full explanation when submitting an individual GenIC request.

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. 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.

A variety of forms will be used in conducting the research under this clearance, and the exact number of different forms, length of each form, and number of subjects/respondents per form are unknown at this time. Based on DOL’s past studies, we request an estimated burden of 5,500 burden hours over three years. While we will not exceed the total burden cap for this generic (5,500), we may use more or less burden within each instrument type.

ESTIMATED ANNUAL BURDEN HOURS

Type of Instrument (Form/Activity)	Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Average Burden Time per Response (hours)	Estimated Burden Hours	Average Hourly Wage	Monetized Value of Time
Semi-structured discussions and focus groups	3,000	1	3,000	1	3,000	\$30.21	\$90,630
Interviews	1,500	1	1,500	1	1,500	\$30.21	\$45,315
Questionnaires/surveys	1,000	1	1,000	1	1,000	\$30.21	\$30,210
Total	5,500		5,500		5,500		\$166,155

Total Annual Cost

To calculate the annualized cost to respondents for the hour burden, we assume that the typical respondent will be social scientists, other recognized national experts, state or local government officials or service providers. Based on data on our expected respondents from the Bureau of Labor Statistics, we use a mean hourly wage of \$30.21³.

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.**

³ This is an average of the mean hourly wages for social scientists (\$43.70), state government officials (\$24.82), local government officials (\$26.36), and social service occupation (\$25.94), from Occupational Employment and Wage Statistics, May 2021 Occupation Profiles https://www.bls.gov/oes/current/oes_stru.htm#11-0000. (120.82/4 = \$30.21)

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 additional 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), and 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.

Based on previous costs, we estimate the annual costs to the Federal Government to average around \$100,000 per GenIC. Costs will be covered by the individual research and evaluation projects, from their data collection budgets. These costs will be described in individual GenIC requests.

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

This is a new information collection request.

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.

Due to the nature of this clearance, there is no definite or tentative time schedule at this point. We expect work to continue continuously throughout the duration of the clearance. For each individual GenIC request, we will provide OMB with an overall project schedule. The Agency will develop individual timelines for projects involving generic clearances based on an understanding that OMB/OIRA will *review within 10 working days* of receiving the information collection request.

Under this generic IC, information will not be collected with the primary purpose of publication, but findings are meant to inform DOL activities and may be incorporated into documents or presentations that are made public.

The following are some examples of ways in which we may share information resulting from these data collections: research design documents or reports; research or technical assistance plans; background materials for technical workgroups; concept maps, process maps, or conceptual frameworks; contextualization of research findings from a follow-up data collection that has full PRA approval; or informational reports to TA providers. In sharing findings, we will describe the study methods and limitations with regard to generalizability and as a basis for policy. Any planned uses, including for publication or sharing of information from this IC will be described and submitted for approval in each individual generic information collection (GenIC).

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.

All instruments will display the expiration date for OMB approval.

18. Explain each exception to the certification statement.

No exceptions are necessary for this information collection.