**Justification for Non-Material Change to ICs Cognitive Interview Data Collections for DOL Research, Formative Study of Trade Adjustment Assistance (TAA) Navigators, Implementation Evaluation of the Strengthening Community Colleges Training Grant Program (SCC) Cohort 2 and Cohort 3, and National Worker Survey under Generic OMB 1290-0043**

This memo requests a non-material change to the Paperwork Reduction Act (PRA) package Information Collection (IC) previously approved by the Office of Management and Budget (OMB Control No. 1290-0043) for data collection for the **Cognitive Interview Data Collections for DOL Research, Formative Study of Trade Adjustment Assistance (TAA) Navigators, Implementation Evaluation of the Strengthening Community Colleges Training Grant Program (SCC) Cohort 2 and Cohort 3,** and **National Worker Survey**. These changes are requested as a result of the Executive Order entitled Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (Defending Women).

**Background**

Cognitive Interview Data Collections for DOL Research: Cognitive interviews (also known as cognitive tests) are requested to make sure the questions in the Worker Survey are easy to understand and answer and understood consistently across participants. Cognitive interviewing uses in-depth interviewing that assesses how people interpret, process, retrieve, and respond to words, phrases, questions, and response options.

Formative Study of Trade Adjustment Assistance (TAA) Navigators: Formative Study of TAA Navigators to build evidence about the roles of Navigators more generally, and also how TAA Navigators support the implementation of the TAA program in some states and local areas. The data collected as part of this Formative Study of TAA Navigators will be used to understand which states employ TAA navigators; selected TAA administrators’ perception about why states have chosen to implement Navigator positions or not; how state with Navigators are using them; how Navigator positions have evolved since their inception; how the role of Navigators in TAA are similar to or different from those in other programs, and to inform potential future research on the effectiveness of Navigators in TAA or other programs.

Implementation Evaluation of the Strengthening Community Colleges Training Grant Program (SCC) Cohort 2 and Cohort 3:The Chief Evaluation Office of the U.S. Department of Labor (DOL) has requested an independent implementation evaluation of the Strengthening Community Colleges Training Grant (SCC). This program provides funding to assist community colleges in expanding workforce development program efforts, building capacity, and improving equity in the skilled workforce for key industry sectors. The program supports community college initiatives to develop, implement, and advance evidence-based strategies that address specific student and employer-perceived challenges and barriers by building a training-to-workforce pipeline program that partners community colleges with industry employers. Trewon Technologies, LLC, has been engaged to conduct this implementation evaluation of the SCC program, with a specific focus on SCC Cohort 2 (13 grantees) and SCC Cohort 3 (15 grantees). This document seeks approval for a generic clearance for a formative data collection to support the implementation evaluation of the Strengthening Community Colleges (SCC) Training Grant program for cohorts SCC2 and SCC3. This data collection will employ formative data collection techniques, including semi-structured focus groups, questionnaires, telephone or in-person interviews, and document reviews, and seeks to describe and more fully understand the implementation of the SCC program. The findings from this data collection will inform and support future and current research related to the outcomes of the SCC program. Still, findings are not highly systematic, do not seek causal relationships, nor are they intended to be statistically representative or otherwise generalizable.

National Worker Survey: Request to conduct formative research to obtain a better understanding of recruitment and administration strategies for the RDS respondents. The formative research will assess the appropriateness and acceptability of using the RDS method to recruit workers in low-wage industries for a study of FLSA violations and would identify potential challenges in the use of the RDS method and mitigation strategies to address these challenges.

**Change Requests**

DOL requests changes to two instruments for the Cognitive Interview Data Collections for DOL Research IC to use an updated demographic question and the discontinuation of ICs where data collection has completed or is no longer relevant. This non-substantive change requests the following:

* For the Cognitive Interview Data Collections for DOL Research IC the Screener (Appendix D) and the National Worker Survey CI Guide (Appendix F) have been updated to ask about “sex” rather than “gender”.
* The discontinuation of the ICs: Formative Study of Trade Adjustment Assistance (TAA) Navigators, Implementation Evaluation of the Strengthening Community Colleges Training Grant Program (SCC) Cohort 2 and Cohort 3, and the National Worker Survey.

The questionnaires have been updated and provided in this package.

These requested non-substantive changes do not require any changes to the burden estimates.