

**SUPPORTING STATEMENT FOR
THE OLDER WORKERS STUDY IMPACT EVALUATION
OMB CONTROL NO. 1290-0NEW**

This is a new information collection request.

PART 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.

SCSEP is the only federally funded employment program that serves individuals ages 55 and older with low incomes. A network of grantees, subgrantees, host agencies, and partners operate the program. Currently, 75 SCSEP grantees, including 56 units of state and territorial governments and 19 national nonprofit organizations, operate the program.

SCSEP, as authorized by Title V of the Older Americans Act of 1965 (OAA), has a dual purpose “to foster individual economic self-sufficiency and to increase the number of participants placed in unsubsidized employment in the public and private sectors, while maintaining the community service focus of the program.” The OAA was amended by the Supporting Older Americans Act of 2020 and the Older Americans Act Reauthorization Act of 2016 (2016 OAA).

Section 502 (e) of the OAA provides for the Secretary “to carry out demonstration projects, pilot projects, and evaluation projects, for the purpose of developing and implementing techniques and approaches, and demonstrating the effectiveness of the techniques and approaches, in addressing the employment and training needs of eligible individuals.”

SCSEP aims to transition participants to unsubsidized (paid private sector) employment by providing a range of services, including a paid, part-time community service assignment with a public sector or nonprofit employer. Participants also receive assessments, case management, and support services. Other training opportunities may be available, such as digital training, occupational training, and on-the-job experience with a private sector employer, but some grantees have noted challenges in providing these opportunities (Kogan et al. 2012). Also, SCSEP participants do not consistently access job search assistance, job readiness activities, and career counseling from American Job Centers.

Although private sector work is the goal, a minority of participants transition to unsubsidized employment. In program year 2018, 13.6 percent of SCSEP participants exited for unsubsidized employment. During the COVID-19 pandemic (program year 2020), the rate declined to 8.3 percent.

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DOL is interested in testing the impact on unsubsidized employment of an intervention that provides occupational training, on-the-job learning, and job search assistance to interested SCSEP participants. DOL issued a Funding Opportunity Announcement (FOA) in April 2024 that invited the national SCSEP grantees to apply for optional Demonstration Grants on Sector-Based Training for Low-Income Older Adult Workers (Sector-based Training Grants Demonstration). The four-year grants will support the design and implementation of sector training services, a package of services including career navigation, occupational training, on-the-job training, and job search assistance that aims to help participants obtain employment in a specific, grantee-selected sector. These services will last up to one year for participants involved in the demonstration. Grantees will work closely with training providers, employers, and local workforce systems to select one or more industry sector(s) and occupation(s) of focus that is locally in demand, design grant activities, and implement them. The impact study will test whether this sector-based training approach can help older workers access unsubsidized employment.

This a **new collection** request is for a study participant Baseline Information Form.

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 Senior Community Service Employment Program (SCSEP), administered by the U.S. Department of Labor (DOL), aims to help low-income seniors ages 55 and older obtain private-sector, unsubsidized employment through job training and placement activities.

To learn more about SCSEP and to inform continuous improvement of the program, the DOL Chief Evaluation Office (CEO), in collaboration with the DOL Employment and Training Administration (ETA) funded Urban Institute and its partner, Capital Research Corporation, to conduct the Older Workers Study. The study includes the following components:

1. A review of existing knowledge and data to inform evaluation activities,
2. An implementation evaluation design,
3. An early implementation study and in-depth implementation study of programs receiving the 2020 DOL SCSEP grants,
4. An impact evaluation that identifies an intervention for a pilot and rigorously evaluates the impact of the intervention on older workers' employment outcomes (primarily placement outcomes), and
5. An evaluability assessment and potential future research options that would address important gaps in the evidence base related to employment services for older workers.

DOL received clearance for the data collection instruments associated with the Older Workers Study in-depth implementation study (component #3) on October 4, 2022. This is a **new collection** request associated with the impact study (component #4). This package requests clearance for one data collection activity that needs to start in January 2025. A timely start to the information collection is critical for conducting the study. The data collection instrument is:

1. Impact Evaluation of the Senior Community Service Employment Program Sector-based Training Grants Demonstration for Low-income Older Workers Baseline Information

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Form (referred to as Impact Study Baseline Information Form (BIF))

DOL will submit additional requests for future data collection for the Older Worker Impact Evaluation.

The impact study will estimate the effect of the sector-based training services developed and implemented by the grantees on participants' unsubsidized employment and earnings. The research questions are:

- What is the impact of the Demonstration program on employment and earnings? Service receipt? Tenure in the SCSEP program?

The evaluation team intends to use a randomized controlled trial (RCT) design. Participants who consent to be in the impact study will receive the BIF prior to random assignment. The data collected through the BIF will supplement information gathered through the Grants Performance Management Data System (GPMS), which houses SCSEP participant records beginning at the time of application. Specifically, the BIF will gather information not available through GPMS, such as details about their longest pre-SCSEP job, reasons they are interested in the

Demonstration services, and quality of life. The BIF will also collect the participant Social Security Number, which is required to obtain study participant employment and wage records from the National Directory of New Hires (NDNH), a national database of quarterly earnings data from state Unemployment Insurance records maintained by the federal Office of Child Support Services within the Administration for Children and Families, U.S. Department of Health and Human Services (HHS). DOL will enter into a Memorandum of Understanding with HHS to use the data. Although SCSEP grantees collect participant SSNs, the data is not available to the study team through the GPMS.

The BIF data will be used to profile the study population, test for systematic differences between the treatment and control groups, define subgroups and improve the precision of impact estimates.

The study seeks to answer the overall question, "Is sector training an effective strategy to help low-income older adults find unsubsidized employment?"

The evidence generated by the evaluation will be relevant not only to SCSEP grantees and their partners, but to DOL policymakers and administrators assessing current and future sectoral training initiatives, and to employers, training institutions and workforce development partners seeking knowledge and evidence about effective strategies and models, practices, and partnerships to facilitate unsubsidized employment.

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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.

Participants who consent to be in the study will fill out a paper form, which grantee staff will enter into an online Participant Tracking System prior to random assignment. Alternatively, grantees may choose to have the form electronically filled out by the participant (with the availability of a computer or tablet at intake). SCSEP grantees note that many participants have very limited computer skills, and may select filling out a paper form as more straightforward.

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 2 above.

The team will use GPMS data for most analyses. The BIF will collect data that is not available through the GPMS.

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. BIF data will be collected from SCSEP participants who consent to be in the study. It is possible that some subgrantees affiliated with the national grantees that receive Sector-based Training Demonstration grants will be small entities. However, the grant application instructions are clear that funded grantees and their subgrantees will participate in an impact study, including data collection associated with the study.

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 data are not collected, DOL will not have the information about participants' employment history deemed necessary to answer research questions and, critically, SSNs required to obtain employment and earnings data from NDNH. The GPMS does not contain necessary post-program detail to calculate employment and earnings impacts.

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 a 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 secrets, 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.

The 60-day notice to solicit public comments was published in the Federal Register, 89 FR 2024-22432 on October 1, 2024. No public comments were received.

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.

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.1. They have expertise in research methodology, sector-based training, and populations similar to those being served in SCSEP.

Table A.1. Technical Working Group

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Jacqueline L. Angel, Wilbur J. Cohen Professor in Health and Social Policy, LBJ School of Public Affairs, University of Texas at Austin

Cal J. Halvorsen, Assistant Professor, Boston College School of Social Work and affiliate of the Center for Aging & Work at Boston College

Maria Heidkamp, Chief Innovation and Policy Officer, New Jersey Council of County Colleges

Susan Houseman, Vice-President and Director of Research, Upjohn Institute for Employment Research

David Judkins, Principal Associate, Abt Associates

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

There are no payments or gifts to study participants who consent to be in the study, fill out the BIF, and get randomly assigned to a study group.

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

All participants taking part in data collection activities sign an informed consent form that describes information collected, and how it will be kept private to the extent permitted by law. In addition to providing consent to take part in the randomized lottery, participants 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 DOL. Further, all participants 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.
*** 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.**

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*** If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

*** 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 under “Annual Cost to Federal Government.”**

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.

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 (\$)	Annual Burden Costs
Baseline Information Form (participants)	1,600	1	1,600	.25	400	\$7.25 ¹	\$2,900

¹ Hourly wage for participants is the minimum wage.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

*** 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 services 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 collections 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.**

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*** 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 other than their time.

14. Provide estimates of annualized costs 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.

The total cost to the Federal government is \$2,212,256, and annualized cost to the federal government is \$553,064. Costs result from the following two categories:

- a. The annualized cost to the federal government for the evaluation contractor, Urban Institute and its partner Capital Research Corporation, to carry out this evaluation is \$539,214. The total cost of the evaluation to date is \$2,156,856. Therefore, the annualized cost is $\$2,156,856 / 4 = 539,214$.
- b. The annualized cost for federal technical staff to oversee the evaluation is \$553,064. This is calculated by the following: an annual level of effort of 200 hours for one Washington, DC-based Federal GS-14 step 2 employee earning \$69.25 per hour. (See Office of Personnel Management Salary Table 2024-DCB; Grade 14, Step 2. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB.pdf>. Hourly salary determined by dividing annual salary by 2080.) Therefore, the annualized cost is $200 \text{ hours} \times \$69.25 = \$13,850$.

The total annualized cost to the federal government is \$553,064 ($\$539,214 + \$13,850$).

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

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

Data collection will begin in January 2025 and will end in August 2027. After data collection, baseline data will be presented in tables in the impact study report. The report will be submitted to DOL in spring 2030.

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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 approval number and expiration date will be displayed or cited on all forms completed as part of the data collection.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

No exceptions are necessary for this information collection.