

**Justification for Non-Substantive Change  
Regarding a Single Follow-Up Survey  
for the Impact Evaluation of the TAA Program  
OMB Control No. 1205-0460, expires November 2009.**

This is to justify conducting a single follow-up survey at 25 months, instead of two follow-up surveys, at 15 and 30 months, for the Impact Evaluation of the Trade Adjustment Assistance (TAA) program. The two follow-up surveys were described in the original Information Collection Request (ICR) for the evaluation, which OMB approved in November 2006.

ETA recently submitted another non-substantive change request, after discussion with the Office of Management and Budget (OMB), regarding changes in incentive payments for survey respondents in an effort to boost response rates. OMB asked ETA to conduct an experiment regarding the incentive payments, which took several months to complete. ETA submitted a memorandum from the evaluation subcontractor (Mathematica) reporting on the experiment. ETA then conferred with OMB regarding the memo and the incentive payment structure for the remainder of the baseline survey data collection. OMB issued the Notice of Action approving that non-substantive change immediately thereafter, on December 5<sup>th</sup>, 2008.

**Background**

The original design of the evaluation called for a baseline survey of two treatment groups, TAA participants and TAA “nonparticipants” (certified workers who did not receive Trade Readjustment Allowances or any TAA services) and two comparison groups of statistically matched Unemployment Insurance (UI) claimants, which were twice as large as the treatment groups. The 15-month follow-up survey was to include TAA participants, TAA nonparticipants, and half the original comparison group members. The 30-month follow-up survey was to be conducted with only TAA participants and their comparison group counterparts (and not TAA nonparticipants and their comparison group). Because of significant delays in conducting the baseline survey, it will now be completed in February 2009, after beginning in March 2008. A 15-month survey would have to begin in June 2009 and end in November 2009, while a 30-month follow-up would have to be started in September 2010 and end in March 2011. ETA now proposes to dispense with the 15-month survey and administer approximately a 25-month follow-up survey in place of the 30-month follow-up, commencing in June 2010.

**Reason for the Single Follow-up Survey**

Given the project delays experienced to date, including the extended time to conduct the baseline interviewing, there is not sufficient time to complete a 30-month survey and conduct data analysis, paper generation, agency review, and briefings prior to the expiration of project funds on September 2011. However, a 25-month survey, to start in June 2010 and end in December of that year, would permit sufficient time for the completing remaining project activities by September 30, 2011. The timing of this survey activity would also accommodate possible concerns about conducting a household survey, even if not a new data collection, during the key spring months of the decennial census in 2010.

Given that the baseline survey has been extended forward in time and that the 30-month survey can be replaced by 25-month survey, the 15-month survey seems dispensable with little loss to the project. Specifically, because the baseline survey has been delayed appreciably, the time elapsed between the baseline survey and a possible 25-month survey may be as short as 16 months for some respondents (as would occur for respondents interviewed in February 2009, when baseline interviewing is to conclude). For a large number of respondents, then, an interim survey at 15-months now makes little sense.

Moreover, dropping the 15-month follow-up survey will yield appreciable cost savings, which can be used to pay for the increased incentive payments now approved by the OMB, the greater level of effort required to obtain acceptable baseline survey response rates, and increases in labor and non-labor costs as a result of lengthy delays early in the project.

Finally, as in the original design, the final follow-up survey will be conducted only with TAA participants and their comparison group counterparts, on the grounds that the focus of the evaluation is on estimating impacts for those who receive TAA services and benefits and administrative data is available to estimate impacts for the TAA nonparticipants.