

Paperwork Reduction Act Submission:
Supporting Statement A for the Office of
Disability Employment Policy (ODEP)

Retaining Employment and Talent after
Injury/Illness Network (RETAIN)
Demonstration Projects and Evaluation,
OMB No. 1230-0NEW

March 2019

OMB SUPPORTING STATEMENT PRA PART A

Retaining Employment and Talent after Injury/Illness Network (RETAIN) Demonstration Projects and Evaluation

A.1 Circumstances Necessitating the Information Collection

The RETAIN Demonstration Projects are a collaborative effort led by the U.S. Department of Labor's Office of Disability Employment Policy (ODEP) in partnership with DOL's Employment and Training Administration (ETA) and the Social Security Administration (SSA). RETAIN—Retaining Employment and Talent after Injury/Illness Network—projects will test the impact of early intervention strategies that improve stay-at-work/return-to-work (SAW/RTW) outcomes of individuals who experience work disability while employed. “Work disability” is defined as an injury, illness, or medical condition that has the potential to inhibit or prevent continued employment or labor force participation.

SAW/RTW programs succeed by returning injured or ill workers to productive work as soon as medically possible during their recovery process and by providing interim part-time or light-duty work and accommodations, as necessary. The RETAIN Demonstration Projects are modeled after promising programs operating in Washington state, including the Centers of Occupational Health and Education (COHE), the Early Return to Work (ERTW), and the Stay at Work programs. While these programs operate within the state's workers' compensation system and are available only to people experiencing work-related injuries or illnesses, the RETAIN Demonstration Projects provide opportunities to improve SAW/RTW outcomes for both occupational and non-occupational injuries and illnesses of people who are employed, or at a minimum in the labor force, when their injury or illness occurs.

Central to these projects is the early coordination of health-care and employment-related supports and services to help injured or ill workers remain in the workforce. These supports and services include:

- Training in occupational health best practices for participating health-care providers;
- Active involvement of a Return-to-Work Coordinator throughout the medical recovery period to facilitate continued employment;
- Enhanced communication among workers, employers, and health-care providers;
- Accommodations and job modifications; and
- Retraining and rehabilitation services.

To accomplish this, projects will provide services through an integrated network of partners that includes close collaboration between state/local workforce development entities, health-care provider systems/networks, and other partners as appropriate.

The primary goals of the RETAIN Demonstration Projects are:

1. To increase employment retention and labor force participation of individuals who acquire, and/or are at risk of developing, work disabilities; and
2. To reduce long-term work disability among project participants, including the need for Social Security Disability Insurance and Supplemental Security Income.

The ultimate purpose of the demonstration is to validate and expand implementation of evidence-based strategies to accomplish these goals.

DOL will administer and manage the grants as well as manage a third-party provider of programmatic technical assistance, while SSA will manage a third-party independent evaluation of the grant program. A separate PRA package will be submitted by SSA.

In order to assess whether the RETAIN projects are serving the target populations through coordinated care and achieving RETAIN's primary goals, DOL and SSA need to collect information that will assist the project's performance management and continuous quality improvement efforts, as well as the third-party evaluation effort, by providing baseline information relating to worker participants and also providing quarterly updates relating to project performance.

Information collection instruments included in this package:

- Baseline Collection Form Part 1
- Baseline Collection Form Part 2
- SSA Authorization of Disclosure Form

Other items included in this package:

- Quarterly Progress Report Appendix A
- Appendix A Program Data Collection Tool
- Appendix A Individual Level Data Collection Tool
- RTW Coordinator Data Collection Tool
- 60-Day FRN

A.2 Purpose and Use of the Information Collection

The purpose of the RETAIN information collection, both baseline worker participant data and quarterly project performance data, is to understand and assess RETAIN program start-up, pilot projects, and full implementation. In addition, worker participant data will be used as baseline data in RETAIN program evaluation activities conducted by SSA's third-party independent evaluator.

The Baseline Participant Forms will be provided to the grantees by ODEP and are included in this package. Part 1 will be completed by each worker participant seeking to enroll in RETAIN. Part 2 will be completed by the health-care provider and/or Return-to-Work Coordinator for each worker participant at the time of enrollment. SSA requires that each worker participant complete an Authorization of Disclosure form, allowing SSA to use the participant's data.

Grantees will be provided guidance by ODEP on metrics to collect for the Quarterly Progress Report Appendix A. There is also a narrative component to the Quarterly Progress Report, which is not addressed here. Included in this package are three files relating to submission of Quarterly Progress Report Appendix A, consisting of two spreadsheets (Appendix A Program Data Collection Tool and Appendix A Individual Level Data Collection Tool) succinctly listing performance metrics as well as a text document (Quarterly Progress Report Appendix A) describing these metrics in detail. One spreadsheet (Appendix A Individual Level Data Collection Tool) concerns individual-level data, solely for worker participants in the treatment group, which will be stripped of any personally-identifying information (PII) such as names, addresses, or dates of birth, before being sent by the grantees to ODEP. All data submitted concerning health-care providers, Return-to-Work Coordinators, and employers will be in aggregate and entered into the other spreadsheet (Appendix A Program Data Collection Tool). Furthermore, we are providing an optional Return-to-Work Coordinator data collection tool to assist grantees in recording the information needed for related metrics that will be entered in the spreadsheets.

A.3 Use of Improved Information Technology and Burden Reduction

ODEP anticipates state agencies and health-care partners will use existing IT systems to the extent possible for collecting data. The completion of the authorization of disclosure form will be integrated with the informed consent process provided to worker participants by the grantees to meet the requirements of the grantees' health-care partners and institutional review boards. Quarterly Progress Reports will be completed and submitted electronically, to minimize burden. Grantees will be able to submit quarterly project reports to ODEP using a secure FTP platform.

A.4 Identification of Duplication of Information Collection Efforts

RETAIN is a new demonstration project, and as such this effort does not duplicate information already collected by ODEP, nor does it duplicate information currently being collected by other programs.

A.5 Impact on Small Businesses or Other Small Entities

This effort is not expected to impact small businesses, as respondents will be individual worker participants, health-care providers, or RTW coordinators.

A.6 Consequence to Federal Proposal or Policy if Collection Is Not Conducted

This data collection will inform ODEP in developing and promoting policies and effective practices to encourage and support positive SAW/RTW outcomes among individuals who develop, or are at risk of developing, a work disability. Without the information provided by this collection, ODEP will be limited in its ability to properly manage and monitor the performance of RETAIN grantees. Additionally, if the information is not collected, SSA's third-party evaluator will not be able to match the data to administrative records, which will severely hamper the quality of the evaluation. The scope and burden of the forms have been reduced as much as possible without sacrificing the value of the information to be collected.

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances relating to the general requirements cited in 5 CFR 1320.5. This request fully complies with 5 CFR 1320.5.

A.8 Federal Register Notice

A.8.1 Federal Register Notice and Comments

DOL published a 60-Day *Federal Register* Notice on June 22, 2018, 83 FR 29137-29139, to allow for public comments. No public comments were received. A copy of this notice is included in this package.

A.8.2 Consultations outside the Agency

The following agencies were consulted in developing the instrument design:

- Office of Management and Budget
- U.S. Department of Labor, Chief Evaluation Office
- U.S. Department of Labor, Employment and Training Administration
- Social Security Administration

In addition, the third-party evaluator reviewed and provided comments on the instruments.

A.9 Payment or Gifts to Respondents

No payments or gifts will be provided to respondents. Grantees are permitted to pay incentives to any party for participation in RETAIN. However, such incentives are not specifically for response to this information collection, completion of which is mandatory for each RETAIN enrollee.

A.10 Assurance of Privacy

Terms of the DOL cooperative agreement authorizing data collection require the states to maintain the privacy of all information collected, unless written permission is provided by the respondent. Informed consent will be provided by all RETAIN participants, allowing the use of data for enrollment procedures, project performance monitoring, continuous quality improvement, and evaluation. All information submitted on the Baseline Participant Form Part 1 is fully protected under the Privacy Act, and a Privacy Act Statement is included on the form.

A.11 Justification for Sensitive Questions

The instrument will ask for the following sensitive information: name, date of birth, social security number, phone number, and address. This information is necessary for Return-to-Work Coordinators to properly track participants' progress and follow up as necessary. Some of this information will also be used to match participant data to administrative data from existing programs with which RETAIN will collaborate, including SSA data. DOL will not receive any personally-identifying information.

A.12 Estimates of Annualized Burden Hours and Costs

Table A.12.1 provides the number of respondents, frequency of response per respondents, and total number of responses for the Baseline Participant Forms; as well as the total burden hours (16,000 hours) and the total burden cost (\$146,826.67) for the data collection. The two Baseline Participant Forms and Authorization of Disclosure Form combined are expected to take 20 minutes to complete. Annually, total burden will amount to 5333 hours and \$48,942.22.

Table A-12.1 Estimated Annualized Respondent Hour and Cost Burdens

Study Component/Form	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Burden per Response (In Hrs.)	Total Burden Hours	Average Hourly Wage¹	Total Annualized Cost
State 1	1,166.67	1	1,166.67	20/60	388.89	\$27.53	\$10,706.11
State 2	1,166.67	1	1,166.67	20/60	388.89	\$27.53	\$10,706.11
State 3	1,166.67	1	1,166.67	20/60	388.89	\$27.53	\$10,706.11
State 4	1,166.67	1	1,166.67	20/60	388.89	\$27.53	\$10,706.11
State 5	166.67	1	166.67	20/60	55.56	\$27.53	\$1,529.44
State 6	166.67	1	166.67	20/60	55.56	\$27.53	\$1,529.44
State 7	166.67	1	166.67	20/60	55.56	\$27.53	\$1,529.44
State 8	166.67	1	166.67	20/60	55.56	\$27.53	\$1,529.44
Year 1, Qtrs 1-3 per Grantee	0.00	1	0.00	20/60	0.00	\$27.53	\$0.00
Year 1, Qtr 4 per Grantee	666.67	1	666.67	20/60	222.22	\$27.53	\$6,117.78
Year 2, Qtrs 1-2 per Grantee	666.67	1	666.67	20/60	222.22	\$27.53	\$6,117.78
Year 2, Qtrs 3-4 per Grantee	2,000.00	1	2,000.00	20/60	666.67	\$27.53	\$18,353.33
Year 3 per Grantee	2,000.00	1	2,000.00	20/60	666.67	\$27.53	\$18,353.33
Three-year Total	5,333.33	1	5,333.33	20/60	1,777.78	\$27.53	\$48,942.22
Three-year Total (non-annualized)	16,000	1	16,000	20/60	5,333.33	\$27.53	\$146,826.67

Note: All rows, except the last, are annualized over three years.

This table assumes 8 grantees in the first 6 quarters and 4 grantees in the next 6 quarters.

A.13 Estimates of Annualized Respondents Capital and Maintenance Costs

There are no expected costs to the respondents or record-keepers.

¹ The hourly wage rate for the study respondents was taken from Bureau of Labor Statistics, “Economic News Release, Table B-3. Average hourly and weekly earnings of all employees on private nonfarm payrolls by industry sector, seasonally adjusted. December 2018” found at: <https://www.bls.gov/news.release/empsit.t19.htm>.

A.14 Estimates of Annualized Cost to the Federal Government

There is no additional cost to the federal government from these data collections, as any analysis or other activities will be conducted using existing resources.

A.15 Changes in Hour Burden

This is a new collection necessary to understand and assess RETAIN program start-up, pilot projects, and full implementation. In addition, worker participant data will be used as baseline data in RETAIN program evaluation activities conducted by SSA's third-party independent evaluator. The Baseline Participant Forms will be provided to the grantees by ODEP and are included in this package. Part 1 will be completed by each worker participant seeking to enroll in RETAIN. Part 2 will be completed by the health-care provider and/or Return-to-Work Coordinator for each worker participant at the time of enrollment. SSA requires that each worker participant complete an Authorization of Disclosure form, allowing SSA to use the participant's data.

A.16 Plans for Tabulation and Publication

Not applicable.

A.17 Approval to Not Display the Expiration Date

All written instruments associated with the effort will display the OMB expiration date.

A.18 Exceptions to Certification Statement

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for this collection.