

# Federal Data Collection Comment Opportunity for AEA Members

# Unemployment Insurance Non-Filer Supplement, Current Population Survey, U.S. Bureau of Labor Statistics

Comments Due March 5, 2018

The Bureau of Labor Statistics plans to ask OMB to approve the Unemployment Insurance (UI) Non-Filer Supplement of the Current Population Survey (CPS). The UI Non-Filer Supplement will gather information on people who are unemployed but also on a subset of those who are not in the labor force. Information will be collected about UI participation and reasons for not participating. The supplement also contains questions about people's job search experience, such as information about jobs for which they have applied and whether they would accept a job similar to their last job but at lower pay. Additionally, this supplement contains questions about the job search process of unemployed individuals and the difficulties these seekers have in finding new employment.

The supplement will be fielded in May and September 2018. Work patterns have changed since the supplement was last collected in 2005, making updated information of paramount importance. Data gathered in this supplement will help measure the effectiveness of current UI programs, identify possible shortcomings in existing UI programs, and assist policy makers in developing more effective policies. The 2018 supplement will be based on the 2005 survey instrument, with significant revisions. The supplement is funded by the Labor Department's Office of the Assistant Secretary for Policy.

## AEA members are encouraged to:

- provide opinions on the value of the CPS UI Non-filer Supplement for economic research;
- comment on the data collection instruments and methods; and
- suggest changes that would enhance data quality, value, and accessibility and lower respondent burden and federal cost.

Federal Register notice: <u>January 2, 2018</u> (includes instructions for submitting comments)

- Draft Survey Instrument (attached)
- Draft Supporting Statement (attached) -- needs, uses, plans, methods, sample, and costs
- Due date for comments: March 5, 2018
- More information: Dori Allard, Office of Employment and Unemployment Statistics, BLS, Allard.Dorinda@bls.gov

## Information on Information Collection Request (ICR) Process:

- By law, each data collection carried out by a federal agency must be cleared by OMB. Through this *Federal Register* notice, BLS is announcing that it intends to submit a request to OMB for clearance to conduct the CPS UI Non-filer Supplement and offers the public a 60-day opportunity to submit comments.
- After the close of the 60-day comment period, BLS will prepare and submit its request to OMB. That request will summarize and respond to each of the public comments it received.

## Guidance to AEA Members on Preparing Comments:

- Can comment on any aspect of the proposed data collection. Possible topics, for instance, include needs, uses, methodology, design, cost, schedule, and consultation with data users.
- May frame comments on specific topics in any way, such as:
  - o assessments identifying what you do and do not like and support
  - o suggestions for how BLS might proceed in this or future collections
  - o requests for example, for a change in the design of the survey instrument, to be consulted in the future, to carry out research on an alternative approach
  - o observations for example, implications of the sample size for statistical reliability
- May propose that OMB incorporate a request in its "terms of clearance." For
  instance, you could suggest as a term of clearance that BLS research the efficacy of
  an alternative set of questions and report back to OMB in a year on the results.

#### Additional AEA Resources:

- A Primer on How to Respond to Calls for Comment on Federal Data Collections
- After reviewing materials, you may provide your observations, critiques, and requests to AEAStat staff Andrew Reamer at <u>areamer@gwu.edu</u> and he will organize them into a draft letter for your review. Prof. Reamer is experienced in crafting comment letters for impact.

## CPS UI Non-Filer Supplement

This is the lead in introduction to the supplement.

## >PRESUP<

This month we are asking some additional questions about unemployment insurance benefits. People who have previously worked can apply to receive these benefits, which replace part of their income while they look for a job.

Accessed after lead in if interviewer needs to explain the purpose of the supplement.

## **HELP SCREEN:**

#### >REASON<

Your cooperation is important because the data collected will be used by the U.S. Department of Labor to learn more about individuals experience with unemployment benefits. Analysis from this survey data will help improve the U.S. unemployment insurance system.

>Q1< [Fill: Are you/Is name] retired FROM A JOB OR BUSINESS?

- 1) Yes
- 2) No

>Q2<What best describes [Fill: your/name's] situation at this time? For example, [fill: are you/is he/is she] disabled, ill, in school, taking care of house or family, or something else?

- 1) Disabled
- 2) Ill
- 3) In school
- 4) Taking care of house or family
- 5) In retirement
- 6) Something else/other

>Q3< [Fill: Have you/Has name] worked at a job or business at any time during the past 12 months?

- 1) Yes
- 2) No

>Q4< [Fill (Have	you/Has name)] applied for unemployment benefits since [Fill (your/her/his)] last job?  1) Yes  2) No
>Q5< [Fill (Have you/H	as name)] received any unemployment benefits since [Fill (your/her/his)] last job?  1) Yes  2) No
>Q6< In what mo	nth and year did [fill (you/he/she)] start receiving unemployment benefits?
>Q7< Did [Fill (you/nar 1) Y 2) N	
>Q8< Why didn't [Fill ( One choice allow	you/name)] receive any unemployment benefits last week? ed.
	ting Vaiting for approval of application pplication approved, but waiting period not over
4) L 5) E 6) S 7) W 8) D ir 9) W 10) D	sed up (exhausted) all benefits eft job voluntarily, quit, or dismissed for conduct or cause arnings or hours too low to qualify trike/work stoppage Vas self-employed or an independent contractor isqualified (fraud, failed to report on time, refused work referral/work offer, icarceration) Vithheld for child support or overpayment ifferent pay periods (every two weeks, monthly) ther (specify) to Q8a
>Q8a< What is th Other Spe	at other reason?

>Q9<

Why [Fill (haven't you/hasn't name)] received any unemployment benefits since [Fill (your/her/his)] last job?

One answer allowed.

# **Applied and Waiting**

- 1) Waiting for approval of application
- 2) Application approved, but waiting period not over

# **Denied Claim / Did Not Qualify**

- 3) Used up (exhausted) all benefits
- 4) Left job voluntarily, quit, or dismissed for conduct or cause
- 5) Earnings or hours too low to qualify
- 6) Strike/work stoppage
- 7) Was self-employed or an independent contractor
- 8) Disqualified (fraud, failed to report on time, refused work referral/work offer, incarceration)
- 9) Withheld for child support or overpayment
- 10) Different pay periods (every two weeks, monthly)
- 11) Other (specify)

>Q9a< What is that other reason?	
Other Specify:	

## >010<

There are a variety of reasons why people might not apply for unemployment benefits. What are the reasons [Fill (you have/name has)] not applied for unemployment benefits since [Fill (your/her/his)] last job? [Interviewer does not read options out loud] MARK ALL THAT APPLY AND PROBE: Was there another reason?

- 1) Plan to file soon
- 2) Voluntarily left last job, retired or was self-employed

## **Knowledge Reasons**

- 3) Did not think eligible
- 4) Did not know benefits existed
- 5) Did not know where or how to apply
- 6) Used up or exhausted benefits
- 7) Last employer didn't give any information

## **Job-Related Reasons**

- 8) Expect to start a new job
- 9) Expect to be recalled to work soon

## **Problems With Application**

- 10) Application was too confusing, technical, or difficult to understand
- 11) Tried to get assistance with application but couldn't get help
- 12) Tried to file by phone or internet but application system wasn't functioning

#### **Attitudinal / Personal Reasons**

- 13) Too much like charity or welfare
- 14) Worried might impact future jobs
- 15) Does not need money / Benefits not expected to be large enough or last long enough
- 16) Expected application to be rejected
- 17) Too much work/hassle to apply or meet requirements

## **Other Problems**

- 18) No transportation
- 19) No telephone, no computer, or internet
- 20) Application or assistance is not available in their language
- 21) Other (specify) \_\_\_\_\_

-	s that other reason?
>Q11< Why didn't [Fill benefits?	l (you/name)] believe [Fill (you were/she was/he was)] eligible for unemployment
	Didn't earn/work enough/worked part time
	Didn't have a recent job
,	Had voluntarily left/quit last job/retired
	Was fired from last job
	Was self-employed or an independent contractor
	Told not eligible by former employer or office
7)	Received severance pay
8)	Other-Specify
-	s that other reason? specify:
>Q13< [Fill (W (your/his/her)]   <1> Ye	
<2> No	
>A1< Now, w months.	e also have a few questions about your experience looking for a new job over the last 2
How many jobs	[Fill have you/has name] applied for, if any, in the last 2 months?
1)	0
2)	1 to 10
3)	11 to 20
4)	21 to 80
5)	81 or more
>A2< To acceprelocate?	t any of the jobs [Fill you/name] applied for, would [Fill you/he/she] have to move or

Yes
 No

>A3< [Fill H	[ave you/Has name] had any problems finding jobs to apply for?
1)	Yes
2) 1	
,	
>A4< What	are the problems that [Fill you have/Name has] had in finding jobs to apply for?
	1) Too few jobs for what I am trained to do / for my education level
	2) The wages are too low
	3) The benefits associated with the job (pension, health insurance) are not good
	The hours of work are too few
	5) The hours of work are not convenient
	5) Jobs do not have flexible enough work schedule
	7) The jobs do not have good promotion potential
	8) Most of the suitable jobs are too far away 9) My health keeps me from being able to do many jobs
	10) Not searching hard enough
	11) Other, specify
	Try Other, specify
>A4a< Wha	t is that other reason?
Othe	er Specify:
>A5< How r	nany of those jobs [Fill you/name] applied for in the last 2 months led to an interview?
1	1) 0
2	2) 1 or 2
3	3) 3 to 7
2	4) 8 or more
>B1< How n	nany job offers, if any, [Fill have you/has name] received since [Fill you/he/she] last worked?
	1) 0
	2) 1
	3) 2 or more

>B2< Thinking about the [fill if B1>1 best] job offer that [Fill you/name] received, why did [Fill you/he/she] turn that job offer down? [Interviewer does not read options out loud]

One answer only

- 1) I have not turned down a job offer
- 2) The wage was too low
- 3) The benefits associated with the job (pension, health insurance) were not good
- 4) The hours of work were too few
- 5) The hours of work were not convenient
- 6) It did not offer a flexible enough schedule
- 7) The job was not in my usual occupation/would not use my skills well
- 8) The job did not have good promotion potential
- 9) The job would have required me to move, relocate to another part of the country
- 10) The commute to the job would have been too long
- 11) Personal reasons for turning down the job (e.g., ill health, could not arrange child care, not physically able to do the job)
- 12) Other, specify

>B2a<				
O	Other Specify: _	 	 	

>B3< How long ago did [Fill you/Name] receive [fill your/his/her] [Fill best] offer?

- 1) Within the last week
- 2) Longer than a week ago but less than a month
- 3) 1 to 2 months ago
- 4) 3 to 6 months ago
- 5) 6 or more months ago

>B4< If [Fill you/Name] were offered that job again today, would [Fill you/he/she] accept it or would [Fill you/he/she] still turn it down?

- 1) Accept the job
- 2) Turn down the job
- 3) I have not turned down the job offer

>B5< If [Fill you were/Name was] were offered a job similar to [Fill your/his/her] last job, would [Fill you/he/she] be willing to accept less pay than [Fill you/he/she] received at that job?

- 1) Yes
- 2) No

#### SUPPORTING STATEMENT

#### A. Justification

#### 1. Necessity of the Information Collected

The purpose of this request for review is to obtain clearance for the Unemployment Insurance (UI) Non-Filer Supplement to the Current Population Survey (CPS), scheduled to be conducted in May 2018 and September 2018. A modified version of this supplement was last given in May 2005, under an interagency agreement between the Department of Labor and the United States Census Bureau. The proposed supplement questions are shown in Attachment A. The UI Non-Filer Supplement will be asked about all household members age 16 or older who are unemployed and about a subset of those who are not in the labor force.

UI benefits are intended to provide temporary financial assistance to people who are unemployed through no fault of their own and meet certain eligibility requirements. These UI payments can have other benefits as well, such as helping to stabilize the economy during recessionary periods. Little, however, is known about the reasons and characteristics of people who do not file for UI benefits. Results from this supplement will be used to determine the number and characteristics of those who do and do not file for UI benefits, as well as non-filers' reasons for not filing. The data are necessary for the Department of Labor and other policymakers to measure the effectiveness of current UI programs and to plan for future changes.

The CPS has been the principal source of the official Government statistics on employment and unemployment for over 75 years. Collection of labor force data through the CPS helps BLS meet its mandate as set forth in Title 29, United States Code, Sections 1 through 9 (Attachment B).

#### 2. Needs and Uses

The UI Non-Filer Supplement will gather information on people who are unemployed but also on a subset of those not in the labor force. Information will be collected about UI participation and reasons for not participating. The supplement also contains questions about people's job search experience, such as information about jobs for which they have applied and whether they would accept a job similar to their last job at lower pay. UI benefits provide temporary financial assistance to the unemployed who meet certain eligibility criteria and can also help protect the economy during economic downturns. Work patterns have changed since the supplement was last collected in 2005, making updated information of paramount importance. Data gathered in this supplement will help measure the effectiveness of existing UI programs and assist policy makers in developing future policies. Additionally, there is a notable dearth of available data describing the job search process of unemployed individuals and the difficulties these seekers have in

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finding new employment. This supplement offers data that can help understand the hurdles the unemployed face while searching for work.

Because this supplement is part of the CPS, in which detailed demographic data are collected, estimates can be produced for a variety of subpopulations. Given sufficient sample size, comparisons between UI filers and non-filers will be possible across characteristics such as sex, race and ethnicity, age, and educational attainment.

#### 3. Use of Information Technology

The Census Bureau, which conducts the actual collection of the CPS data—designing the sample, training and monitoring the interviewers, and conducting a continuing quality control program—uses methods designed to keep respondent burden as low as possible. These interviewing methods, which include the use of computer-assisted interviewing, were improved as part of a complete redesign of the CPS implemented in January 1994. The redesign was preceded by years of wide-ranging discussions, research, and large-scale field tests aimed at long-range improvements in the survey.

The CPS and all of its supplements are collected 100 percent electronically by using Computer Assisted Telephone Interviews and Computer Assisted Personal Interviews (CATI/CAPI). With the collection of Basic CPS data for January 2007, an updated computer-assisted interviewing software, called Blaise, was introduced for running the data collection instrument. Blaise is a Windows-based survey processing system developed by Statistics Netherlands and licensed by Westat in the United States. The questions in the UI Non-Filer Supplement were designed to obtain the required information with minimal respondent burden.

## 4. Efforts to Identify Duplication

There are few data sources about the characteristics of unemployed people who do not file for UI benefits and their reasons for not doing so. Some other CPS supplements contain basic information about people who receive UI benefits. The Annual Social and Economic Survey contains information about income received through UI benefits; this information, however, is limited to income received through UI programs in the past year and does not include any information on people who did not file or who filed but did not receive benefits. Another CPS supplement, the biennial Displaced Worker Supplement, collects information about UI participation and whether benefits were exhausted; these data are collected only for those age 20 or older who have been displaced from a job in the past three years.

Some smaller scale studies of UI participants have been conducted using administrative data or samples from UI Claims data. For example, a Department of Labor (DOL)-sponsored, two-wave longitudinal study in two areas of California examined the experience of UI recipients, and 2008-2009 claims data were used to examine the

experiences of UI participants who did and did not exhaust their benefits. Since these studies relied on administrative data from UI Claims, UI non-filers were not included.

Lastly, there is a lack of available data about the difficulties unemployed individuals have in seeking new employment. The questions about applications and job offers will help fill that lack by supplying data not previously collected in the CPS.

## 5. Minimizing Burden

The data are collected from households; their collection does not involve any small businesses or other small entities.

#### 6. Consequences of Less Frequent Collection

Because the UI Non-Filer Supplement has not been conducted since 2005, there has been a dearth of high quality data in recent years about people who do not file for UI benefits and their reasons for not doing so. More information is needed to assess the efficacy of UI programs. This information—in combination with information collected in the monthly CPS, such as demographic characteristics and information about last job held—will help guide law makers to determine if new policies or regulations are needed to protect these and other types of workers.

#### Special Circumstances

There are no special circumstances. The CPS data are collected in a manner that is consistent with the guidelines in 5 CFR 1320.5.

#### 8. Federal Register Notice/Consultation Outside the Agency

## Federal Register Notice

No comments were received as a result of a Federal Register notice published in 83 FR 157 on January 2, 2018.

#### Outside Consultation

The following people have been in continuous consultation concerning the development of the survey:

## U.S. Department of Labor

Molly Irwin
Chief Evaluation Officer
Office of the Assistant Secretary for Policy
Department of Labor
(202) 693-5091

**Commented [EG1]:** To be updated at the end of the comment period

Census Bureau
Lisa Clement
Survey Director, Current Population Survey
Bureau of the Census
4600 Silver Hill Rd Rm 7H105
Washington, DC 20233-8400
(301) 763-5482

In addition to the above, a statement soliciting comments for improving CPS data is prominently placed in all Census Bureau publications that cite CPS data. A similar statement is included in the technical documentation that accompanies the microdata files. Finally, the CPS advance letters (Attachments D and E) provide respondents with an address at the Census Bureau to which they can submit general comments on the survey, specifically those regarding respondent burden.

#### 9. Paying Respondents

The Census Bureau does not make any payments or provide any gifts to individuals participating in the CPS.

#### 10. Assurance of Confidentiality

The Census Bureau will collect the supplement data in compliance with the Privacy Act of 1974 and OMB Circular A-130. Each sample household will receive an advance letter (Attachment D) approximately one week before the start of the initial CPS interview and a follow-up letter approximately one week before the start of the fifth CPS interview (Attachment E). The letters include the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and state the estimated time required for participating in the survey. Field representatives must ask each respondent if he/she received the advance letter and, if not, must provide a copy of the letter to each respondent and allow sufficient time for him/her to read the contents. Also, interviewers provide households with the pamphlet "How the Census Bureau Keeps Your Information Confidential," which further describes the Census Bureau's commitment to data confidentiality (Attachment F). If they feel it will be helpful, interviewers also provide households with the "Factsheet for the Current Population Survey," which contains information about and data from the CPS (Attachment C). All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9 (Attachment G). Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or substantial fine if he/she discloses any information given to him/her.

As is the case with data collection, data released to the public by BLS in tabular form or as microdata files are released in compliance with Title 13. Tabular data released to the public are always in aggregated form. No individual survey records are made available to the public. Any microdata files that are released are public use files with all identifying information removed from the records.

#### 11. Justification for Sensitive Questions

No sensitive questions are asked in this supplement.

#### 12. Estimate of Respondent Burden

The estimated respondent burden for the May and September 2018 UI Non-Filer Supplements is 2,000 hours. This is based on an average burden of approximately 2 minutes for each of the 60,000 people asked about in the supplement (30,000 each for May and September). Generally, one respondent answers for the household. The actual respondent burden is dependent upon the size of the household and the characteristics of its occupants. The overall annualized dollar cost to the respondents for collection of the supplement data is \$28,000. This estimate assumes a wage rate for all respondents of \$14.00 an hour, the median hourly earnings for workers paid by the hour in 2016.

Table 1. Estimated Annual Respondent Burden (Hours and Dollars)

Total Respondents	Frequency	Total Annual Responses	Average Time per Response	Estimated Total Burden (Hours)	Estimated Total Burden (Dollars)
60,000	Once	60,000	2 minutes	2,000	\$28,000

<sup>\*\*</sup>Costs are rounded to the nearest dollar and calculated using the 2016 median hourly wage rate of \$14.00 per hour from the Current Population Survey.

#### 13. Estimate of Cost Burden

- a. Capital start-up costs: \$0
- b. Total operation and maintenance and purchase of services: \$0

There are no costs to survey respondents other than the time it takes to respond to the questionnaire. Respondents answer questions based on personal experience, which requires no record-keeping or other expenses.

#### 14. Cost to the Federal Government

The total estimated cost of the May and September 2018 supplements is \$x,000. This cost is borne by the DOL's Office of the Assistant Secretary for Policy (OASP) and largely represents the charge by the Census Bureau for conducting the supplement. Census activities for this supplement include programming the collection instrument, developing interviewer training materials, collecting and processing data, and creating a public use microdata file. Also included are costs for BLS staff to evaluate data quality, analyze results, prepare a news release, and publish estimates.

Commented [EG2]: Budget estimates are being calculated

#### 15. Changes in Respondent Burden

This is a new data collection.

#### 16. <u>Time Schedule for Information Collection and Publication</u>

The May 2018 CPS, of which this supplement is a part, will be conducted largely during the week of May 13-19, 2018. The September 2018 CPS will be conducted largely during the week of September 16-22, 2018. Processing of these supplements will commence in June 2018 and October 2018, respectively. Survey results will appear as a news release in 2019.

The news release will be published in electronic and paper formats. The electronic news release will be posted on the BLS webpage at www.bls.gov/cps. Paper copies will be mailed upon request. Additionally, the Census Bureau will release a public use version of the microdata after the publication of the news release.

#### 17. Request to Not Display Expiration Date

The Census Bureau does not wish to display the assigned expiration date of the information collection because the instrument is automated and the respondent, therefore, would never see the date. The advance letters sent to households by the Census Bureau contains Census's OMB clearance number for the CPS and Census's version of the failure to comply notice. (See attachments D and E.) Copies of these advance letters are stockpiled by the Census Bureau for use as needed; changes to the letter would make the current inventory of letters unusable.

## 18. Exceptions to the Certification

There are no exceptions to the certification.

#### SUPPORTING STATEMENT B

# B. <u>Collection of Information Employing Statistical Methods</u>

# 1. Universe and Respondent Burden

The UI Non-Filer Supplement will be conducted in May and September 2018, in conjunction with the CPS, for which the universe is 122 million households. From this universe, we select a sample of approximately 72,000 households each month, of which approximately 60,000 households are eligible for interviews. About 53,000 households are actually interviewed each month. The items in the supplement are asked, as appropriate, for members of the households.

# 2. Procedures for Collecting Information

This is a supplemental survey associated with the May and September 2018 CPS. The statistical properties of the supplemental questions will fall within those associated with the CPS itself. See Attachment H for information on sample design and selection. For information about estimation procedures, see Chapter 10 of "Current Population Survey Design and Methodology: Technical Paper 66," available at http://www.census.gov/prod/2006pubs/tp-66.pdf.

# 3. <u>Methods to Maximize Response</u>

Response rates and data accuracy for the CPS are maintained at high levels through internal consistency edits in the computerized instrument, interviewer instructions, training, and close monitoring of these data. For information about data accuracy and nonresponse, see "Current Population Survey Design and Methodology: Technical Paper 66" (training of interviewers is detailed in Appendix D, design of the instrument is described in Chapter 6, data processing is described in Chapter 9, and nonresponse is described in Chapters 15 and 16), available at <a href="http://www.census.gov/prod/2006pubs/tp-66.pdf">http://www.census.gov/prod/2006pubs/tp-66.pdf</a>.

# 4. <u>Testing of Procedures</u>

The 2018 UI Non-Filer Supplement questionnaire is based on the questionnaire used for the 2005 supplement, collected under an interagency agreement between the Department of Labor and the United States Census Bureau. (See Attachment A for the 2018 questionnaire.) However, there were a number of minor changes; for example, a number of response options were altered or modernized. In addition, new questions about job search activity and job offers were added. Job search activity questions included the number of jobs applied for over the past 2 months, whether the job would require relocating, whether there were difficulties in finding jobs to apply for, and if so, what those difficulties were. Questions

about job offers included the number of offers since the last job, reason for not accepting offers, and whether the person would accept a job similar to their last job but at lower pay. All questions in the UI Non-Filer Supplement underwent cognitive testing and expert review. Attachment I discusses the findings from the cognitive testing.

In addition, the UI Non-Filer Supplement is subject to the same testing procedures as the monthly CPS. This includes instrument testing, output testing, and systems testing.

# 5. <u>Contact Persons</u>

The following individuals may be consulted concerning the statistical data collection and analysis operation:

# **Statistical Design:**

Yang Cheng Demographic Statistical Methods Division Bureau of the Census (301) 763-3287

## Statistical Analysis:

Dori Allard Office of Employment and Unemployment Statistics Bureau of Labor Statistics (202) 691-6470

## Data Collection/Survey Design:

Lisa A. Clement Survey Director, Current Population Survey Bureau of the Census (301) 763-5482

#### Attachments

- A. Supplement Questionnaire
- B. Title 29, United States Code, Sections 1 through 9
- C. CPS Factsheet
- D. CPS Advance Letter MIS 1
- E. CPS Advance Letter MIS 5
- F. Confidentiality Brochure
- G. Title 13, United States Code
- H. Redesign of the Sample for the Current Population Survey
- I. Cognitive Testing Report