SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSIONS

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.

The U.S. Department of Labor (DOL), and the Employment and Training Administration (ETA) and the Center for Faith-Based and Community Initiatives (CFBCI) specifically, needs accurate, timely information on how services and systems under Workforce Investment Act (WIA) are unfolding and on the challenges and successes states and local areas encounter. Only in this way can it properly discharge its obligations to issue policy clarifications, regulations and technical assistance. This need is particularly acute given that the workforce investment system has been evolving rapidly in the several years since WIA was enacted. It is expected that WIA will continue to change rapidly.

Much of the information available to DOL on key operational issues is impressionistic or anecdotal in nature, based on hearsay or unsystematic observations, and not accurate as to the incidence or scope nationally. When accurate nationwide information is available, as from long-term in-depth evaluation studies, it is often not timely. Thus DOL has a need for accurate and timely information that can be found only with systematic studies.

Regarding the survey for Workforce Investment Boards (WIBs) in particular, the White House Office of Faith-Based and Community Initiatives (WHOFBCI) and OMB have directed DOL to conduct this survey. The reason is that ETA and CFBCI currently do not have a mechanism by which to obtain information regarding the grants, contracts, and cooperative agreements being awarded by local and state WIBs using WIA formula funds. It is critical that DOL obtain this information in order to better understand how much money is being spent and the types of organizations that receive the funds. DOL is especially interested to obtain information on those grants being awarded to faith-based and community-based non-profit organizations and about grants using WIA youth funds in particular. This WIB survey will bridge the gap in DOL's knowledge of WIB grants, contracts, and cooperative agreements that utilize WIA youth funds.

The U.S. Department of Justice (DOJ) is in a similar situation. Like the DOL, much of the information available to DOJ on key operational issues is impressionistic or anecdotal in nature, based on hearsay or unsystematic observations, and not accurate as to the incidence or scope nationally. When accurate nationwide information is available, as from long-term in-depth evaluation studies, it is often not timely. Thus DOJ has a need for accurate and timely information that can be found only with systematic studies. Absent this survey, the DOJ does not have a mechanism by which to obtain information regarding certain grants, contracts, and cooperative agreements being awarded by state administering agencies using DOJ funds, particularly the Bureau of Justice Assistance's Residential Substance Abuse Treatment for State

Prisoners program (RSAT). It is critical that DOJ obtain this information in order to better understand how much money is being spent and the types of organizations that receive the funds. Again, like DOL, DOJ is especially interested to obtain information on those grants being awarded to faith-based and community-based non-profit organizations.

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.

This DOL survey is designed fill a critical gap in its information needs regarding how the workforce system is unfolding and will inform development of legislation, regulations and technical assistance. The WHOFBCI used the information gathered by DOL in the December 2005 survey to determine the degree to which faith-based and community-based non-profit organizations received WIA Youth formula funds at the state and local levels. DOL will use the information gathered in the upcoming surveys to determine whether there have been any changes in the way DOL funds have been awarded, especially regarding their issuance to faith-based and community-based non-profit organizations.

The DOJ survey will fill a critical gap in DOJ's information needs regarding the issuance of DOJ funds and inform development of legislation, regulations, technical assistance, and possible program re-structuring. Results from both surveys will likely be compared to the survey results from other Federal Departments with Centers for Faith-Based and Community Initiatives.

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 burdens.

The DOL survey will be administered via electronic submission on the Internet, as it was in December 2005. The Internet will be used as a way of reducing respondent burden and increasing the efficiency of data collection and processing. It is anticipated that most of this survey's respondents will respond using the Internet version of the survey, though some will likely e-mail their responses; an option that will be discussed in more depth later in this document. The DOJ is also using electronic submission of responses as a way to reduce burden. The DOJ will distribute its survey to its 56 state administering agencies by e-mail, along with instructions for filling out the form; the state administering agencies will also be asked to respond via e-mail.

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 information being requested is not otherwise available. Other research and evaluation efforts, including case studies or long-range studies, either cover only a limited number of sites or take many years for data to be gathered and analyzed.   Administrative information and data are too limited: The five-year Workforce Investment Plans, submitted by states and local areas, are too general in nature to meet DOL's informational needs and need be updated only once every five years; mandated quarterly or annual reporting requirements of states and local areas provide some information, but primarily about cost outlays and the number and characteristics of clients served and their outcomes; and participant outcome data does not provide information on key operational practices and issues. Thus, DOL has no alternative mechanism for collecting information that responds to the WHOFBCI and OMB request. This information is similarly unavailable from any other sources within the DOJ.

DOL and DOJ will make efforts to ease the burden on the universe of state and local level respondents. The proposed surveys will provide timely information that responds to the WHOFBCI, DOJ, and OMB requests and will supplement and complement, but not duplicate, other evaluation efforts and program reporting requirements.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information has no impact on small businesses or other small entities.

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.

Without the information collected through the proposed surveys, DOL and DOJ will be less effective in carrying out their oversight and technical assistance functions. These functions depend on each agency's staying abreast of emerging challenges or impediments to the delivery of workforce services under WIA and substance abuse treatment services for state prisoners under RSAT. Only with such information can these agencies effectively issue policy guidance or clarifications or identify and redress technical assistance needs that states or local areas may have. The WHOFBCI and OMB will likely use the information for the same purposes as DOL and DOJ.

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 secret, 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 that would cause this information collection to be conducted in any manner listed above.

8. If applicable, provide a copy and identify the data 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.

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.**

In accordance with 5 CFR 1320.8(d), DOL has published a notice in the *Federal Register* on August 25, 2006, allowing the public 60 days to comment on the proposed reinstatement of this survey [Volume 71, Number 165, Page 50467-50468]. To date, no comments were received.

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

This item is not applicable. No payment or gift to respondents will occur.

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

Persons to whom the questionnaire is distributed will be assured that their cooperation is entirely voluntary and that their responses will be held in confidence. DOL data collection will be carried out by an ETA contractor and will be released to the WHOFBCI, OMB, and public at-large in aggregated form only, so that no specific state or local area agency will be identified. The ETA contractor will follow rigorous procedures for assuring and maintaining respondents' confidentiality. In keeping with this, access to any data with identifying information will be limited only to DOL staff, CFBCI staff, and contractor staff directly working on the survey.

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 form whom the information is requested, and any steps to be taken to obtain their consent.

None of the questionnaire items will involve sensitive content, such as the topics referenced in this question.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **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.**

DOL will survey all of the state and local Workforce Investment Boards (WIBs) – 59 and 599 respectively. Fifty-three percent of the state WIBs and 65 percent of the local WIBs responded to the 2005 survey. We expect a 70 percent response rate for the upcoming survey, which translates to responses from 461 WIBs. It took the average WIB seven minutes to complete the 2005 survey and we expect the average WIB to complete these surveys within 10 minutes. This survey will be conducted once a year for three years. We do not plan to conduct special surveys to obtain information on burden estimates. The burden on respondents is not expected to vary widely.

This is the first time that the DOJ has conducted its survey. The DOJ pre-tested its survey in five states and determined that it would take, on average, 2 hours for each state administering agency to complete its data collection form. DOJ will survey all of its 56 state administering agencies. We anticipate that the response rate for the DOJ survey will be comparable to that of the 2005 DOL survey, i.e., 70 percent. This translates to responses from 39 agencies.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

- **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 in Item 14.**

The cost to respondents should be as follows:

For DOL survey:
461 respondents x 10 minutes per survey = approximately 77 hours x $30 per hour = $2,303. The $30 per hour estimate is based on what a reasonable standard hourly wage is for the administrative staff that will be answering the survey.

For DOJ survey:

39 respondents x 2 hours per survey = 78 hours x $30 per hour = $2,352. The $30 per hour estimate is based on what a reasonable standard hourly wage is for the administrative staff that will be answering the survey.

The difference in the hour estimate for the DOL and DOJ surveys reflects differences in survey instructions/requirements. The DOL survey was generally completed by WIB staffs, whereas the DOJ estimated is predicated on DOJ's requesting state agencies use their own files or contact their subcontractors and grantees to provide the information. In fact, the volume of data the states will report to DOJ will likely be greater than the volume each individual WIB reports to DOL.

13. **Provide an estimate of 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 shown in Items 12 and 14).**

- **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.

The proposed information collection plan will not require the respondents to purchase equipment or services or to establish new data retrieval mechanisms.

(a) We do not expect any total capital and start-up costs.

(b) We do not expect extensive time spent on generating, maintaining, and disclosing or providing the information.

- **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 collection 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.**

The proposed information collection plan will not require the respondents to purchase equipment or services or to establish new data retrieval mechanisms. These costs are not expected to vary.

- **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.**

We do not expect responding agencies to purchase equipment or services in order to respond to this information collection plan effort.

14. Provide estimates of annualized cost 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The Federal government's costs for this effort will derive from the contractors who will conduct the surveys. We have projected that the DOL survey will cost the federal government $35,000 to complete. This estimate takes into account all expenses, including variable hours for different professionals (project manager, senior researcher, research associate), as well as equipment and overhead. The DOJ survey will be administered by the Bureau of Justice Assistance and no cost has been calculated for this internal function.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

The estimate of burden for DOL recipients is slightly lower than estimated prior to the 2005 survey; because the actual response time was lower than initially estimated. Previously, DOL estimated that each survey would take 20 minutes, resulting in a total annual burden of 180 hours. Based on experience with the survey, DOL now estimates that each survey will take approximately 10 minutes resulting in a total annual burden of 77 hours.

Since this is a new survey for DOJ, their estimates of 78 annual burden hours have been added to the DOL estimates.

Since this survey was originally planned as a one-time survey, it was discontinued in April 2006. The reinstatement of this survey results in a program change of 155 annual burden hours.

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.

The WHOFBCI, DOJ, DOL, or OMB may publish the results, along with findings from other Federal Departments with Centers for Faith-Based and Community Initiatives. A summary of the results from the 2005 survey at DOL and DOJ are published on the WHOFBCI Website at http://www.whitehouse.gov/government/fbci/final_report_2005.pdf. Neither agency anticipates that complex analytical techniques will be used if a decision is made to publish the results.

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.

DOL will display the OMB control number and expiration date for any individual surveys under this clearance.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

There are no exceptions to the certification statement.

B. Collection of Information Employment Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked "Yes", the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

We plan to survey the entire universe of DOL state and local WIBs, i.e., 658 WIBs. We anticipate the response rate to be 70 percent, which will yield responses from approximately 461 WIBs.

The DOJ will survey the entire universe of its 56 state administering agencies. As with the DOL survey, we anticipate a response rate of 70 percent, which will yield responses from an estimated 39 state agencies.

2. Describe the procedures for the collection of information including:

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**
- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequently than annual) data collection cycles to reduce burden.**

Since we are planning to survey all state and local WIBs, rather than taking a representative sample of them, none of the first four bullet points outlined above apply to this survey. Regarding the last bullet point, this survey is envisioned for annual data collection so that the WHOFBCI, DOL and DOJ can ascertain fund expenditures for this initiative on a regular basis.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

Our process for maximizing response rates, begins with DOL and DOJ sending DOL and DOJ respondents a preliminary e-mail describing the survey, its importance, and how respondents can access it. In the case of the DOL survey, this first communication will be followed by an e-mail that includes each respondent's unique user ID and password, as well as an automatic link to the survey. Mid-way through the survey process we will begin a series of e-mail and telephone follow-up reminders/encouragements for those who have not responded to our survey. If any respondents have difficulties accessing or completing the online survey, we will provide them with the option of e-mailing their survey results to us rather than utilizing the web version.

DOJ respondents will also receive mid-way through the survey process, a series of e-mail and telephone follow-up reminders/encouragements for those who have not responded to the survey. Throughout the survey time period, DOJ staff will be available to state administers to provide technical assistance to complete the form.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

The contractor will pretest each survey with up to, but no more than, nine respondents. The pretest will assess the clarity of content and wording of the survey, the organization and format of the questionnaire, respondent burden time, and potential sources of response error. The pretest will be used to modify the questionnaire, instructions, or navigation as appropriate.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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