

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL  
UNDER THE PAPERWORK REDUCTION ACT OF 1995**

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## **A. JUSTIFICATION**

This is a justification for the Department of Labor, Employment and Training Administration's (ETA) request for approval to implement reporting and recordkeeping requirements of the YouthBuild (YB) program. This reporting structure features standardized data collection for program participants and quarterly progress and Management Information System (MIS) report formats. All data collection and reporting will be done by YouthBuild grantees.

The quarterly progress reports provide a detailed, narrative account of program activities, accomplishments, and progress toward performance outcomes during the quarter. The quarterly performance reports include aggregate and participant-level information on demographic characteristics, types of services received, placements, outcomes, and follow-up status. Specifically, these reports collect data on individuals who receive education, occupational skill training, leadership development services, and other services essential to preparing at-risk youth for high-wage, high-demand occupations through YouthBuild programs.

The accuracy, reliability, and comparability of program reports submitted by grantees using federal funds are fundamental elements of good public administration and are necessary tools for maintaining and demonstrating system integrity. The use of a standard set of data elements, definitions, and specifications at all levels of the workforce system helps improve the quality of performance information that is received by ETA.

### **A.1 Circumstances Necessitating Data Collection**

On September 22, 2006, President Bush signed into law the YouthBuild Transfer Act (Pub. L. 109-281) which transfers the YouthBuild program from the Department of Housing and Urban Development (HUD) to the Department of Labor (DOL). The Employment and Training Administration (ETA) will administer the YouthBuild program beginning in FY 2007. The YouthBuild program is designed to: enable disadvantaged youth to obtain the education and employment skills necessary to achieve economic self-sufficiency in occupations in demand and post-secondary education and training opportunities; provide disadvantaged youth with opportunities for meaningful work and service to communities; foster the development of employment and leadership skills and commitment to community development among youth in low-income communities; and expand the supply of permanent affordable housing for homeless individuals and low-income families by utilizing the energies and talents of disadvantaged youth.

The YouthBuild Transfer Act also emphasizes post-secondary transitions for participants and stronger linkages with the One-Stop Career Center System, community colleges, and apprenticeship programs.

YouthBuild is designed to assist youth who are often significantly behind in basic skills, in obtaining a high school diploma or GED credential. In YouthBuild, unemployed and undereducated young people ages 16-24 work toward their GED or high school diploma while learning job skills by building affordable housing for homeless and low-income people. The primary target populations for YouthBuild are adjudicated youth, youth aging out of foster care,

out-of-school youth, and other at-risk populations. The reporting and recordkeeping system incorporates each of these aspects necessary for program evaluation.

Three outcome measures will be used to measure success in the YouthBuild grants: placement in employment or education, attainment of a degree or certificate, and literacy and numeracy gains. These are the youth common performance measures implemented across federal job training programs as of July 1, 2005. By standardizing the reporting and performance requirements of different programs, the common measures give ETA the ability to compare across programs the core goals of the workforce system—how many people entered jobs; how many stay employed; and how many successfully completed an educational program. In addition to the three outcome measures, grantees will report on a number of leading indicators that serve as predictors of success. These include participation in education or training, attainment of degrees and certificates, workforce preparation, mentoring, community service, post-secondary exploration and preparation, and leadership development.

In applying for the YouthBuild grants, grantees agree to submit participant data and aggregate reports on enrollee characteristics, services provided, placements, outcomes, and follow-up status. Grantees will collect and report quarterly YouthBuild performance data using an ETA-provided MIS. The MIS will be a web-based case management and reporting application housed on ETA's servers.

Pub.L. No. 105-220, Sec 185(d) (The Workforce Investment Act) broadly addresses reports, recordkeeping, and investigations across programs authorized under Title I of the Act. The provisions of section 185:

- require the Secretary to ensure that all elements of the information required for reports be defined and reported uniformly [section 185(d)(2)]
- direct each state, local board, and recipient (other than a sub-recipient, sub-grantee, or contractor of a recipient) to prescribe and maintain comparable management information systems, in accordance with the guidelines that shall be prescribed by the Secretary designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188 [section 185(c)(2)]
- require that recipients of funds under Title I shall maintain such records and submit such reports in such form and containing such information as the Secretary may require regarding the performance of programs and activities carried out under Title I [section 185(a)(2)]
- require that recipients of funds under Title I shall maintain standardized records for all individual participants and provide to the Secretary a sufficient number of such records to provide for an adequate analysis of the records [section 185(a)(3)]
- specify that the reports shall include information about programs and activities carried out under Title I pertaining to:
  - relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants
  - programs and activities in which participants are enrolled, and the length of time

- that participants are engaged in such programs and activities
  - outcomes of the programs and activities for participants, including the occupations of participants and placement for participants in nontraditional employment
  - specified costs of the programs and activities
  - information necessary to prepare reports to comply with section 188 and 29 CFR Part 37.37 [(a-b),(d-e)].
- require that all elements of the information required for the reports described in section 185(d)(1)(A-E) above are defined and uniformly reported.

Pub.L. No. 105-220, Sec 189(d) (The Workforce Investment Act) requires the Secretary to prepare and submit to Congress an annual report regarding the programs and activities carried out under Title I. The report must include:

- a summary of the achievements, failures and problems of the programs and activities in meeting the objectives of Title I
- a summary of major findings from research, evaluations, pilot projects, and experiments conducted under Title I in the fiscal year prior to the submission of the report
- recommendations for modifications in the programs and activities based on analysis of such findings
- such other recommendations for legislative or administrative action as the Secretary determines to be appropriate

## **A.2 How, by Whom, and For What Purpose the Information is to be Used**

Grantees will be expected to implement new recordkeeping and reporting requirements with grant funds. As a government-procured MIS will be provided to all grantees, their implementation costs will be minimized. Grant funds may also be used with the prior approval of the grant officer to upgrade computer hardware and internet access to enable projects to use the MIS.

Grantees will enter data into the MIS on individuals who receive services through YouthBuild programs. These data will be used by the Department and ETA to evaluate performance and delivery of YouthBuild program services. Attachment A contains a list of the required data elements to be collected in the MIS and the purpose for collecting each item. The MIS will allow grantees to collect additional participant data beyond those elements required by YouthBuild.

ETA will use the data to track total participants, characteristics, services, and outcomes for YouthBuild participants. Common measures will enhance ETA's ability to assess the effectiveness of the YouthBuild program within the broader youth workforce investment system.

Within ETA, the data are used by the Offices of Workforce Investment, Financial and Administrative Management, Policy Development and Research, Performance and Technology, and Field Operations (including the regional offices). Other DOL users include the Offices of

the Assistant Secretary for ETA and Assistant Secretary for Policy.

The reports and other analyses of the data will be made available to the public through publication and other appropriate methods and to the appropriate congressional committees through copies of such reports. In addition, information obtained through the MIS information and reporting system will be used at the national level during budget and allocation hearings for DOL compliance with the Government Performance and Results Act (GPRA) and other legislative requirements, and during legislative reauthorization proceedings.

### **A.3 Use of Technology to Reduce Burden**

To comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of participant data and the preparation of quarterly reports to the extent feasible by providing a web-based MIS/Case Management System and by providing uniform data elements and data definitions to grantees across ETA programs. All YouthBuild data and reports will be submitted to ETA via the internet. Grantees will collect, retain, and report all information electronically through the ETA-provided MIS.

### **A.4 Efforts to Identify Duplication**

A hallmark of WIA Title I is increased accountability in exchange for optimal flexibility. Title I has strengthened accountability by requiring more comprehensive performance standards and establishing quarterly reports for demonstration projects. The data items identified in Attachment A are needed on the individual MIS records to support the measures, and much of these data will be used by grantees to prepare the quarterly progress reports.

ETA has minimized the reporting burden by establishing the number of data elements required commensurate with the level of resources expended and services received. Data items collected by program reports and individual records are needed to: (1) account for the detailed educational, occupational skill training, post-secondary planning and placement, and leadership services and activities provided by YouthBuild program grantees to help at-risk youth participants get and keep well paying jobs; (2) better identify overlapping and unproductive duplication of services; and (3) reduce the effect of stove-piped data and generate performance information across employment and training programs. Information provided through the Youthbuild management information and reporting system is not available through other data collection and report systems.

### **A.5 Methods to Minimize Burden on Small Businesses**

For reporting purposes, the involvement of small businesses or other small entities that are not grantees or sub-grantees is extremely limited. The only time contacting them may be required is during the provision of a service. Methods to minimize the burden on small entities that are grantees or subgrantees are discussed in other sections of this supporting statement.

## A.6 Consequences of Less-Frequent Data Collection

29 CFR 95.51(b) (59 F.R. 38271, July 27, 1994), which governs monitoring and reporting program performance under grants and agreements with non-profit organizations, states that quarterly reports shall be due 30 days after the reporting period. If ETA did not comply with these requirements, funding for discretionary grant programs would be compromised. In applying for YouthBuild grants, grantees agree to meet ETA's reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY06-08), which requires the submission of quarterly reports within 30 days after the end of the quarter.

## A.7 Special Circumstances for Data Collection

These data collection efforts do not involve any special circumstances.

## A.8 Federal Register Notice and Consultation Outside the Agency

A 60-Day Notice for Public Comment was published in the Federal Register volume 72, page 9588 on March 2, 2007. DOL received a number of extremely useful suggestions for improving the operations of the YouthBuild Performance system. As one example, since the YouthBuild is an on-going program in which youth are enrolled for a period of time several people commented on the need to enter the last date of activities in each month. DOL has removed those data elements which should streamline data collection. In addition, some commenters helpfully provided edits and corrections to typographical errors. Overall, the comments provided were thoughtful and provided us with valuable information which will inform the overall design of the system and its smooth implementation. A summary of the comments received and the Department's responses can be found below.

DOL will provide extensive training on the use of the performance system and will provide on-going help-desk support to assist users in day-to-day operations.

Public Comment Summary	Agency Response
Several commenters suggested that the MIS system be designed to export data to other systems to enable grantees to provide data required by other funders to minimize double entry of data.	DOL is amenable to this suggestion and is exploring export options.
One commenter asked if columns A, C, and D would calculate automatically on the Quarterly Performance Report.	All of the information required for the Quarterly Performance is automatically generated and calculated by the system.
Several commentators noted that the system collects data on specific activities related to education, job training, workforce preparation, community involvement, leadership development, post-secondary exploration and planning, mentoring, health services, and supportive services. For each activity, the MIS asks for the start date of the activity, the expected completion date, the last date of activity during the month, the end date of the activity, and whether the participant successfully completed the activity. Since these activities are taking place throughout the	DOL agrees with that this is burdensome and has removed "last date of activity for the month" in each of the categories of on-going activities.

<p>program and are often integrated with one another entering the last date of activity during the month seemed burdensome.</p>	
<p>Another commenter suggested that in YouthBuild programs, most of the activities mentioned above take place from the beginning of the program and occur throughout. They are intertwined and not necessarily offered as distinct activities since YouthBuild programs operate as a comprehensive model. If participants are engaged in all these activities throughout the program cycle, will this data prove useful to DOL?</p> <p>In a related comment, it was noted that there are a number of data elements that are part of the MIS but not part of the Quarterly Performance Report and recommended that data elements that do not contribute to calculations in the Quarterly Performance Report be flagged in the MIS and be made optional.</p>	<p>DOL designed the case management system to be used by the program to gather and use real-time data for program management and improvement. Data required by DOL for quarterly reports will be automatically generated through the use of this case management system.</p> <p>As noted above, many of the fields in the MIS system are provided as options for the grantee to use for day-to-day management of the program. Many of the fields in the system are optional and therefore, do not represent undue burden for grantees.</p>
<p>One commenter indicated that no performance indicators or benchmarks were included and suggested that grantees measure their own performance against what was promised in their proposals.</p>	<p>DOL will establish national performance benchmarks for all YouthBuild grantees once grants have been awarded.</p>
<p>Several commenters ask about the kind of back-up documentation that will be required and if such documentation will need to be kept in a participant's paper file. One commenter recommended that grantees control their own document and certification process and that self-reporting and self-certifying be acceptable beyond a social security card and a birth certificate to ensure that the recruitment and certification process happens in a timely and compressed manner and that the program can set its start date because it has oversight over the enrollment and eligibility process.</p>	<p>DOL will provide further guidance on required documentation for eligibility, services, and outcomes as part of the new YouthBuild grantee orientation.</p>
<p>One commenter noted that their agency's WIA MIS system has numerous approval points (checks and balances) that allow us to manage our program and to track down errors in data and would like to see the YouthBuild program have a similar system.</p>	<p>DOL's YouthBuild MIS will have a similar system of checks and balances.</p>
<p>One commenter noted that data could then be sent to YouthBuild USA (in place of the State level in WIA) and that YouthBuild USA could roll up the data for DOL.</p>	<p>DOL will be responsible for all data collection internally.</p>
<p>One commenter recommended that the analysis of the "participant data collection burden" be split into two separate components: 1) to <i>record and collect</i> the data and 2) to <i>enter</i> the data into the system because these two tasks are different. At the current level of sophistication, one staff member will likely be responsible for entering the data into the system (this will ensure data integrity) and multiple program staff will be responsible for recording and collecting data within their respective areas of responsibility.</p>	<p>DOL believes that the two components are adequately covered in the burden hours listed. If the two components were separated, the current total of burden hours would still add up to the same amount of burden hours.</p>

<p>One commenter believes that grantees will have to spend a significant amount of time developing protocol for collecting the data, if they do not already have an MIS system for case management in place that can be linked to the YouthBuild MIS.</p>	<p>DOL believes that systematic data collection is essential to the quality management of youth programs and will work with the grantees to develop appropriate systems and protocols.</p>
<p>One commenter noted that on pages 9-10 of the "Supporting Statement for Request for OMB Approval under the Paperwork Reduction Act of 1995," it estimates that it will take "375 hours annually per respondent for the participant data collection." This would amount to 31,875 hours/year. However, on pages 7-8, it estimates the national burden of hours at 5,400, which is only about 64 hours per respondent. We are not sure what accounts for this discrepancy.</p>	<p>DOL has corrected this discrepancy. The supporting statement was corrected to read that it will take "64 hours annually per respondent for the participant data collection."</p>
<p>Several commenters noted that the format of the quarterly performance report shows data from the "previous quarter," for the "current quarter," "cumulative for program year," and "program-to-date." This format does not take into consideration the length of a YouthBuild program cycle, which may range from 6 months to over 18 months in duration. Thus, depending on the reporting quarter, it will be difficult to measure outcomes as participants will still be engaged in the program and working towards those outcomes. For instance, the outcomes at the end of the program year may not reflect a complete program cycle if the cycle runs for more than one year; as a result outcomes may look artificially low.</p> <p>Another commenter noted that at the end of a program cycle, programs should be able to report their cumulative outcomes; and at the end of the grant, programs should be able to total outcomes for all participants</p>	<p>DOL agrees that information should be aggregated by participant cohort and has added a cohort indicator. In addition, DOL has added a field which will allow grantee to split one cohort in to two or more teams. This will also support the generation of cumulative outcomes</p>
<p>One commenter suggests that it would be useful for grantees to be able to run various reports in the MIS, not just the Quarterly Performance Report.</p>	<p>DOL agrees. The system will provide numerous reports that can be run in real-time for analysis and management and/or reporting to other funders.</p>
<p>One commenter pointed out that there are inconsistent answer options for data elements #23 (individual with a disability) and #24 (health issues). Both questions should have the same answer options as "yes", "no" and "no self-identification."</p>	<p>DOL agrees and will make change element 23 (individual with disability) to be consistent with element #24 (health issues)</p>
<p>16. How does #73 (date entered post-secondary education for those still enrolled in the YouthBuild program but who already have their GED or high school diploma) differ from #192 (date entered post-secondary education during program participation)?</p> <p>For short-term indicator #5 (entered post-secondary education), is this taken from data element #73 or #192?</p>	<p>DOL agrees that these fields are not different and has removed #73. Element #175 (former #192) will be used to capture short-term indicator #5 (entered post-secondary education). For the long-term education measure, the system will utilize the information contained in elements 207-222.</p>
<p>Post-program employment, job retention data, and post-program wage are to be tracked for 3 quarters after exit. For other pieces of data such as post-secondary education and credentialing data, will this only be tracked for 3 quarters as well?</p>	<p>The YouthBuild program will have a 12 month follow-up period which will involve four quarters of data.</p>



One commenter asked whether the enrollment goal which is part of the Quarterly Performance Report is the enrollment goal for the quarter, for the program year, or for the grant.	The Quarterly Performance Report enrollment goal is for the program year.
One commenter noted that Participation Rate Specification was not included in the attachments.	The participation rate specification is now included as an attachment.
One commenter was able to identify the data elements for pre-apprenticeship programs but was unable to find the data element on registered apprenticeships and was concerned because short-term indicator #8 is about "entered registered apprenticeship."	Elements #176 through #181 collect information on <u>registered apprenticeships</u> ; elements #92-95 collect information on <u>pre-apprenticeship programs</u> and are not outcome measures but rather interim benchmarks.
One commenter noted that the report specification for long-term indicator #1 (placement in education or employment), did not correspond to the data element definitions/instructions and also noted that no data element field existed for "school status at participation."	DOL has modified the report specifications to include the other possible reasons for exit and has removed "school status at participation" from the calculation.
One commenter recommended that for long-term indicator #2 (attainment of a degree or certificate) that the attainment of a degree (a GED or high school diploma) be measured separately from the attainment of a certificate, rather than measuring them together.	As part of DOL's required Common Measures, attainment of degree or certificate is one measure however, the users will be able to record when a participant has earned a GED and a certificate or a high school diploma and a GED. For more information on the Common Measures please see Training and Employment Guidance Letter (TEGL) No. 17-05 - "Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues, April 11, 2006," which is located at: <a href="http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2195#content">http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2195#content</a> .
One commenter noted that there are no data elements for "date administered post-test" and "educational functioning level post-test" although they are listed in the specification for calculating the literacy and numeracy gains.	"Date administered post-test" and "educational functioning level post-test" are automatically calculated by the system based on information entered by case workers on individual participants.
One commenter noted that there was no specification as to how the "recidivism rate" is calculated.	The method for calculating recidivism is included.
One commenter noted that there was no specification as to how the "retention rate" is calculated.	Retention is a long term measure and looks at whether the participant is in either post-secondary education, long term occupational skill training, or employment. As part of the 1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> , and 4 <sup>th</sup> quarter follow-up, the system will ask about these three outcomes and automatically calculate the retention rate.
One commenter requested that the system be modified to collect the number of applicants that are turned away to document the need for the program, the program's reputation in the community, and its potential impact.	DOL is unable to accommodate this request
One commenter recommended that the MIS track the number of "new housing units completed" and the number of "housing units rehabilitated" to demonstrate both outcomes and program impact.	DOL agrees that this is important information, however the system is designed to capture information participant performance information not project level information such as this. Grantees will certainly want to keep track of how many houses that they have built or rehabilitated
One commenter asked that the system distinguish	DOL will provide management reports which distinguish

	and count the number of participants who successfully complete the YouthBuild program and those that are terminated from the program or who drop out.	successful and non-successful exiters.	
	One commenter suggested that because of the age range of YouthBuild participants (16-24) that an additional data element, "adult offender" be added and be defined as "an individual who has been convicted of a crime by the adult correctional system."	DOL agrees and has added a "adult offender" as a data element.	
	Other commenters recommended that personal counseling be added as a program activity to record counselor's work with students on highly personal issues that are not career related that may, without attention, they will interfere with the student's academic or job success.	Although counseling is an important aspect of youth development programs, the intent for the MIS system is not to account for staff time but to track youth outcomes; therefore, this information will not be captured by the system.	
	Some commenters recommended that the system should capture the amount of time spent by case managers interfacing with the criminal justice or foster care system since frequent meetings with probation and parole officers, visits to Court, accessing legal assistance, managing fees from driving tickets, and the like, are critical to students' retention in the program.	DOL recognizes that YouthBuild staff will spend portions of their time interfacing with other public systems such as Juvenile Justice, the public school system, and/or the Foster Care system, the intent for the MIS system is not to account for staff time but to track youth outcomes.	
<b>Responses to Comments on Specific Data Elements</b>			
	<b>Element</b>	<b>Comment</b>	<b>DOL Response</b>
4 – 9	Ethnicity Hispanic/Latino  American Indian or Alaska Native  Asian  Black or African American  Hawaiian Native or other Pacific Islander  White	Suggest leave blank if the participant does not disclose his/her ethnicity i.e., Blank = no self-disclosure  Also, For #4 (ethnicity Hispanic/Latino), there are three answer options, "yes", "no", and "no self-disclosure." For the remaining 5 ethnicity questions, there are only two answer options, "yes" and "not reported." It is recommended that the answer options be the same for all ethnicity questions and that they be "yes", "no" and "not reported."  Can more than one ethnicity/race be selected per participant? If more than one ethnicity/race can be selected per participant then the total number of individuals under the ethnicity/race questions will not add up to the total number of participants served.	This method is consistent with the U.S. Census Bureau which treats ethnicity different from race and only includes Hispanic/Latino as an ethnicity. DOL understands that there are different schools of thought on this; however, in the interest of consistency have chosen to follow the Census Bureau lead.  The system allows more than one race to be selected.
10	Marital Status	add "domestic partnership" as an answer option.	DOL agrees and has added this as an option.
11, 12, 13	Children, Children Living with Participant, & Other Dependents Living with Participant	Number of children participant has (should this state 'own' children Number of own children living in household (what about other children?) Dependent other than children living with participant (what about dependent children) What about dependent children?	Individual grantees may establish what this field refers to for internal management.

14	Highest School Grade Completed	Record 88 = What about dropouts who attained GED or equivalent?  Record 89 = What about those without a disability?	According to the exceptions listed on the left in the data element/instruction column, if a dropout attains a GED or equivalent enter 88 and if a youth without a disability receives a certificate of attendance/completion enter 89.
17	Low Income Family	States "Enter definition" YBUSA also notes this as well	The definition of a low income family has been added to the data element/instruction column for this data element.
20	Basic Skills Deficient	The data element definitions/instructions specify that only participants who are at or below the 8 <sup>th</sup> grade level be counted in this data element. It is recommended that all grades below 9 NOT be counted together. For example, there is a big difference whether a participant enters at the 7 <sup>th</sup> grade level or at the 3 <sup>rd</sup> grade level. There is also no place to record the type of test administered and its result. Furthermore, there are no guidelines as to when the at-entry education test should be administered.	The specific level for each individual is recorded elsewhere in the system so grantees will be able to identify each individual participant's specific literacy/numeracy level. This field is for eligibility determination only.  The system contains an input screen to record the type of test and results. The at-entry test should be administered as soon as the young person has been enrolled; that is, at the completion of the mental toughness or orientation phase of the program.
21	Child of Incarcerated Parent	Please change to, "Parents or legal guardians currently incarcerated," and add "Parents or legal guardians ever incarcerated during participant's lifetime."	This element has been modified to include legal guardians.
25	Employment Status at Participation	The question is in what time period did that person have to have done the work in order to be considered employed at the time of enrollment? In the last week? In the last month? Or a different time period?	If the youth is employed for more than 15 hours per week on the day that he/she is enrolled in the program, enter yes; otherwise enter no If he/she was employed last week but is not employed at time of enrollment, enter no. If at time of enrollment, they are employed 10 hours per week, they are still considered unemployed.
25 - 29	Employment Participation	It is understood that YouthBuild participants enter YouthBuild programs with low academic and employment skills. However, according to the Reporting Handbook, if a participant is employed at entry, he or she is not counted in the indicator for "placement in employment and education." It is assumed that participants engaged in some kind of formal schooling are not included either. The data element, "School status at participation", was not included as one of the YouthBuild Data Elements in Attachment B. It is argued that participants who were employed (or in school) at program entry be included in the numerator if they made increases in their hourly wage or number of hours worked upon	A youth employed at time of enrollment will not be included in the measure for placement in employment and education, but will, however, be included in the retention measure.  DOL understands this concern however, this was the method agreed upon for common measures.  DOL agrees and has added the ability to track wage gains and movement into better employment.  The system will consider participants employed at enrollment if they are in a job for 15 hours or more per week and they will be excluded them from the placement measure. If, at time of enrollment, they are

		<p>placement. DOL should be in a position to measure any gains made during the YouthBuild program regardless of their employment/school status at entry. It is estimated that between 10% and 20% of participants are employed at program entry.</p> <p>#26-29 (occupation at enrollment): Most participants seek YouthBuild because they are unemployed or under-employed. It is unlikely that participants are employed at program entry. These 4 questions are not necessary to ask of participants and unduly increase the data burden on grantees. Further, if a participant is employed at entry, placement in better or higher paid employment would not be counted as part of the “placement in education or employment” indicator (long-term indicator #1 in the Quarterly Performance Report). Grantees should get credit if they are helping even an employed student increase his or her wages or land a new job connected to a career pathway.</p>	<p>employed less than 15 hours per week, they will be included in the denominator for the placement measure.</p> <p>The only required element is “employment at enrollment.” The other three elements are optional.</p>
26	Occupation	The 8-digit occupational code should be available in the MIS as a dropdown option.	This definition for this element was incorrect; it has been corrected. There is a list of broad occupations available in the drop down box.
30	Housing Status at Enrollment	<p>There does not appear to be a choice which would capture young people living in a group home but not re-entering after being in prison. For example, young people living in group homes due to child abuse/neglect and/or living in independent living facilities as they prepare to transition out of the foster care system. Recommend that this be added to one of the definitions or added as its own definition.</p> <p>Explain: This definition includes any individual who has a primary night time residency</p>	<p>DOL agrees and has added an option of group home in this data element.</p> <p>The definition for a homeless individual has been clarified as follows: any individual who may regularly stay at a publicly or privately operated shelter for temporary accommodation; an institution providing temporary residence for individuals intended to be institutionalized; or a public or private place not designated for or ordinarily used as a regular sleeping accommodation for human beings. This definition does not include an individual imprisoned or detained under an Act of Congress or State law. An individual who may be sleeping in a temporary accommodation while away from home</p>

			should not, as a result of that alone, be recorded as homeless.
34	Date of Program Participation	It is unclear which "assessment information" is being referred to in order to autogenerate the date of program participation. It is recommended that the date of program participation begin upon completion of the program's orientation process (typically 30 days)	The enrollment date will not be automatically generated. The case manager will "hard enter" the enrollment date. Intake information can be entered before enrollment date is entered. DOL understands that many YouthBuild programs include an orientation or "mental toughness" portion of their enrollment process and that not all youth who participate in this will, in fact, enroll.
35	Date of Exit	The system does not appear to allow for tracking of alumni support and achievements such as job retention, college retention, etc. We think it would be helpful to have a date of program exit for the date the participant stops receiving regular program services, and then, a date of alumni or follow-up exit for the date one year after the program exit date so that more robust alumni data can be tracked all year long for the follow-up year. During the follow-up year, do not time the participant out until the full follow-up year has passed.	Programs enter the exit date for program participants. Once the exit date is entered, the participant becomes part of the follow-up pool. The system allows for tracking post-program placements as part of recording follow-up activities. If an attempt is made to contact a participant for follow-up and the participant cannot be reached, they will not be removed from the system; the system does not time out participants. The system tracks follow-up attempts.
37	Other Reasons for Exit (at time of exit or during 3-quarter measurement period following the quarter of exit)	We suggest adding a field for incarcerated as a reason for exit as this is, typically, and unfortunately, a reason for exit for 1-2 of our young people every year.	DOL understands that some participants may exit the program as a result of being incarcerated; however, this is not a valid reason for exit. When one of the valid values listed for this element are entered, the participant will be excluded from the denominator and not counted against the program for purposes of calculating long term measures. An arrest does not remove the individual from the denominator and they are still part of the measure since incarceration is not considered a successful outcome.
38	Date Entered Math/Reading Remediation	Define: Basic literacy skills deficient	The definition of basic skills deficient which covers both numeracy and literacy has been added to the "Date Entered Math/Reading Remediation" element.
42 & 47	Completed Math/Reading Remediation  Completed GED Preparation	Define: Successfully Completed	The grantee has the discretion to determine when a participant has successfully completed either of these two activities.

53	Expected Duration of Vocational/ Occupational Skills Training	The valid values don't match the definition of the data element. It seems from the definition of the data element that this is measuring how long the participant is expected to be in vocational training, i.e. 6 months, 9 months, 1 year, etc.... but the valid values are measured in hours per month.	This element has been removed thus reducing the burden.
76-78	Post-secondary education	Refers to youth who are in post-secondary education while in YouthBuild. How would one record the data when the participant is no longer in YouthBuild (i.e. completed the YouthBuild program) but still in post-secondary education? Will the grantee be able to count it as a placement?	For youth who are no longer in YouthBuild, the system records the youth's participation in post-secondary education or training as part of follow-up. This counts as a placement.
84 & 85	Date Ended Subsidized Employment  Completed Subsidized Employment	What is the difference between data element #84 and 85?  Is OJT the same as subsidized employment?	The "Date Ended Subsidized Employment" element records when participant stopped subsidized employment; the "Completed Subsidized Employment" element records a successful completion of a subsidized employment placement.  With OJT, the employer pays for training on the job; this OJT is not necessarily subsidized employment.
133 - 163	Health services data elements	Please specify which data element one would use to record a participant's absence for a period of weeks due to giving birth. Would it be "Non-Emergency Medical Care" or "Other Health Services" or some other data element?	DOL has added an element for pregnancy absences
176 & 182	Date of Initial Placement into Unsubsidized Employment  Date of Placement Into Unsubsidized Employment #1	How is this data element different from data element # 182? If they are the same, why not populate data element #182 with the data from data element # 176? If they are different, it would be less confusing to call data element # 176 Unsubsidized Employment #1, etc.	DOL has changed the numbering sequence for these elements.
188		The data element name seems incorrect. It should read "repeat fields 182 to 187 for additional jobs."	Noted and corrected however element #s are now 184 - 189
189	Re-Arrested/Re-Incarcerated	How do you record a participant being arrested for the first time?	DOL has added an element to indicate first arrest after enrollment.
201	Date of Follow-up for 1 <sup>st</sup> Quarter After the Exit Quarter Employment and Wage Information	Is this data element tracking all attempts to follow-up with participant or only successful attempts, i.e. when the participant was actually reached? Please specify.	The system tracks successful and unsuccessful follow-up attempts.

218	Attained Diploma, GED, or Certificate #1	<p>Can more than one value be entered for the same time period?</p> <p>Grantees should be able to report attainment of a driver's license as a certificate.</p>	<p>More than one value can be entered but only one will count towards common measures. All values will be reported on interim benchmark reports.</p> <p>Although earning a driver's license is important for employment not only in construction but for other fields of work ETA does not consider the attainment of a driver's license as a certificate for purposes of common measures. A field will be added to track this as part of interim benchmark and case management.</p> <p>Please note that a commercial driver's license (CDL) is a recognized credential.</p>
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### **A.9 Payment of Gifts to Respondents**

There are no payments to respondents other than the grant funds described in the Solicitation for Grant Applications (SGA/DFA PY-04-08).

### **A.10 Confidentiality Assurances**

ETA is responsible for protecting the confidentiality of the YouthBuild participant and performance data and will maintain the data in accordance with all applicable federal laws, with particular emphasis on compliance with the provisions of the Privacy and Freedom of Information Acts. The Department is working diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted. All contractors that have access to individually identifying information are required to provide assurances that they will respect and protect the confidentiality of the data. ETA's Performance and Technology Office (PROTECH) has been an active participant in the development and approval of data security measures – especially as they apply to the web-based version of the YouthBuild system.

### **A.11 Additional Justification for Sensitive Questions**

While sensitive questions will be asked of participants in the proposed data collection, the confidentiality of participants will be protected as discussed in section A.10. In addition, security will be built into the data collection system by the MIS contractor. Participant responses to these sensitive questions will allow ETA to comprehensively evaluate the effectiveness of the YouthBuild program.

### **A.12 Estimates of the Burden of Data Collection**

The annual national burden for the YouthBuild reporting system has three components: (1) the participant data collection burden; (2) the quarterly narrative progress report burden; and (3) the quarterly performance report burden.. This response provides a separate burden for each of the three components.

(1). Participant Data Collection Burden

The YouthBuild *participant data collection burden* considers the amount of participant and performance-related information collected and reported on the participant record that would not have to be collected by the grantees as part of their customary and usual burden to run the program. Thus the burden reflects the information collected solely to comply with the federal reporting requirements. The participant data collection estimate also does not include the burden associated with collecting and reporting information required to meet EEO requirements, which is covered under a separate burden estimate.

The data collection burden will vary by participant based on the range and intensity of services provided by the grantee as well as by the number of participants served.

Record Type	Hrs. Per Record	PY 06 Estimated National Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Participant	1.8	3000	5,400	\$10.75	\$58,050

Hourly rates used to calculate cost depend upon the type of organization administering the program. For private non-profit grantees, the hourly rate is the average hourly earnings in the Census Bureau's social assistance industry category (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

(2). Quarterly Narrative Progress Report Burden

The YouthBuild *quarterly narrative progress report burden* involves providing a detailed account of all activities undertaken during the quarter including in-depth information on accomplishments, promising approaches, progress toward performance outcomes, upcoming grant activities, and updates on product, curricula, and training development. It is assumed that each grantee will spend approximately two days (16 hours) per quarter preparing this report.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Narrative Progress Report	64	85	5,440	\$10.75	\$58,480



### (3). Quarterly Performance Report Burden

The *quarterly performance report burden* assumes that all grantees will use the ETA-provided MIS to generate quarterly performance reports (referred to as MIS Reports in SGA/DFA PY-04-08). The MIS is designed to apply edit checks to participant data and to generate facsimiles of the aggregate information on enrollee characteristics, services provided, placements, outcomes, and follow-up status in quarterly report format. The burden includes reviewing and correcting errors identified by the MIS in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Performance Report	64	85	5,440	\$10.75	\$58,480

#### A.13 Estimated Cost to Respondents

- a) **Start-up/capital costs:** There are no start-up costs, as ETA will provide grantees with a free, web-based, data collection and reporting system that grantees will use to collect and maintain participant data, apply edit checks to the data, and generate the quarterly reports.
- b) **Annual costs:** There are no annual costs, as ETA will be responsible for the annual maintenance costs for the free, web-based, data collection and reporting system.

#### A.14 Estimates of Annualized Costs to Federal Government

The start-up cost for developing the new ETA on-line reporting system is estimated to be \$430,000. The annual costs of maintaining the system and developing training and technical assistance guides, estimated to be \$285,000, are borne by ETA.

#### A.15 Changes in Burden

This is a new collection of information occasioned by the statutory transfer of the YouthBuild Grants from the U.S. Department of Health and Human Resources to the U.S. Department of Labor. The recordkeeping and reporting requirements are proposed in order to manage the grant program effectively and to track performance outcomes consistent with national youth common performance measures.

#### A.16 Tabulation of Publication Plans and Time Schedules for the Project

Grantees will submit narrative progress and MIS performance reports on a quarterly basis to ETA within 30 days of the end of each quarter. Quarterly report data will be analyzed by ETA

staff and used to evaluate performance outcomes and program effectiveness.

Each year, ETA issues an annual report summarizing program performance based on the Secretary’s goals. Data contained in the YouthBuild reports may be included in these reports. The data will also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports. All reports are available on the internet and accessible to the public.

<b>Product</b>	<b>Submission Date</b>	<b>Comments</b>
<b>Quarterly Narrative Progress Report</b>	Within 30 days after the end of the quarter.	Quarterly progress reports and MIS data will be submitted electronically using ETA’s On-Line Electronic Reporting System.
<b>Quarterly Performance Report</b>	Within 30 days after the end of the quarter.	

**A.17 Approval Not to Display OMB Expiration Date**

The expiration date for OMB approval will be displayed. We are not seeking approval to have this concealed. Once OMB approval is received, ETA will issue guidance that will formally transmit the reporting package to grantees that includes the following statement: “It is estimated that, on average, the time needed to complete the YouthBuild reporting requirements will be 64 hours annually per respondent for the participant data collection, 64 hours annually per respondent for the quarterly narrative progress report, and 64 hours annually per respondent for the quarterly performance report, as detailed in the table below. You may submit any comments regarding these reporting documents to: Mr. Gregg Weltz, Office of Workforce Investment/Office of Youth Services, U.S. Department of Labor, Employment and Training Administration, 200 Constitution Avenue, NW Room N4459, Washington, D.C. 20210 ([weltz.greg@dol.gov](mailto:weltz.greg@dol.gov)). Please include Paperwork Reduction Act 1205-0NEW with your correspondence.”

<b>Form/Activity</b>	<b>Total Annual Burden/Hours</b>	<b>Total Respondents</b>	<b>Average Annual Hours/Respondent</b>
Participant Data Collection	5,400	85 grantees	64
Quarterly Narrative Progress Report	5,440	85 grantees	64

Quarterly Performance Report	5,440	85 grantees	64
Total	16,280	85grantees	192

**A.18 Exceptions to OMB Form 83-I**

No exceptions are requested in the “Certification of Paperwork Reduction Act Submissions.”

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

This information collection request does not contain statistical methods.