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

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A. JUSTIFICATION

This document provides the justification for the request by the Department of Labor, Employment and Training Administration (ETA) for approval to implement new reporting requirements for the High Growth Job Training Initiative (HGJTI) and the Community-Based Job Training Grants (CBJTG). ETA will require grantees to submit standardized quarterly reports summarizing the number and types of participants served by grantees, the number of exiters, the number of participants engaged in training activities, and some participant outcomes. To calculate the common measures for each grantee and for the program as a whole, ETA will also require grantees to submit quarterly participant records for exiters that contain the minimum number of elements needed to obtain the information to calculate the common measures. ETA plans to use these records to obtain wage record information from the Wage Record Interchange System (WRIS), which in turn ETA will use to compute common measures. These reports and records will help ETA gauge the effects of the HGJTI and CBJTG grants, identify grantees that could serve as useful models, and target technical assistance appropriately. Attachment A contains the reporting instructions.

A.1 Circumstances Necessitating Data Collection

In 2001, the President announced a Management Agenda to improve the management and performance of the Federal government. Budget and performance integration, one of the five government-wide goals, emphasizes program effectiveness. In keeping with the President's Management Agenda, the Office of Management and Budget (OMB) and other Federal agencies developed a set of common performance measures to be applied to certain Federally funded employment and training programs with similar strategic goals.

These common performance measures will enhance the government's ability to assess the effectiveness and the impact of the workforce investment system, including its performance in serving people who face significant barriers to employment. Multiple sets of performance measures have burdened states and grantees, as they are required to report performance outcomes based on varying definitions and methodologies. By minimizing the differences in reporting and performance requirements, common performance measures can facilitate the integration of service delivery and break down barriers to coordination among programs.

The common measures are a key component of the HGJTI and CBJTG performance accountability system, because they permit the core purposes of the workforce system to be described in a similar manner: How many people found jobs? Did people stay employed? Did their earnings increase? Standardizing the definitions of the outcomes across programs simplifies reporting and facilitates comparison and management of results. Implementing reporting requirements that facilitate calculation of the common measures for the HGJTI and CBJTG will enhance the Agency's ability to manage the programs and assess the overall effectiveness of the workforce investment system.

ETA's statutory and regulatory authority to administer these programs includes provisions for the requirement of performance reporting from grantees. The legislative authority for these programs comes from the Workforce Investment Act (WIA) (29 U.S.C. 2801 et seq.) and the American Competitiveness in the Twenty-first Century Act of 2000 as amended, both of which

authorize and/or require that ETA collect information from grantees regarding program performance and participant outcomes.

Information is collected from the HGJTI and CBJTG grantees under the following authorities:

WIA Section 185 broadly addresses reports, recordkeeping, and investigations across programs authorized under Title I of the Act:

- 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 designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant and financial data necessary for reporting, monitoring, and evaluating purposes [Section 185(c)(2)]

- Require that recipients of funds under Title I maintain records and reports containing information the Secretary may require regarding the performance of programs [Section 185(a)(2)]

- Require that recipients of funds under Title I maintain standardized records for all individual participants [Section 185(a)(3)]

WIA Section 189(d) requires that the Secretary prepare and submit to Congress an annual report regarding the programs and activities carried out under Title I. Included in these reports are:

- A summary of the achievements, failures, and problems of the programs and activities in meeting the objectives of Title I

- 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

The American Competitiveness and Workforce Improvement Act of 1998, Title IV, Section 414 (c), as amended by the Consolidated Appropriations Act of 2005, Division J, Title IV, Subtitle B, Section 428 and WIA Section 171(a) direct the Secretary to require grantees to report on the employment outcomes obtained by workers receiving training under this subsection using indicators of performance that are consistent with other indicators used for employment and training programs administered by the Secretary, such as entry into employment, retention in employment, and increases in earnings.

A.2 How, by Whom, and for What Purpose the Information Is to Be Used

ETA will use the information grantees report for the following purposes:

1. To provide program and performance information to stakeholders, including participants, businesses, taxpayers, Congress, and others

2. To continuously improve the quality, effectiveness, and efficiency of the programs

3. To provide management information for use in Federal program administration and oversight, including grant-specific participation, service, and outcome summaries

4. To fulfill ETA's compliance with the Government Performance and Results Act (GPRA) and to complete the OMB Performance Assessment Rating Tool (PART) review.

In addition, information obtained through this reporting will be used at the national level during budget and allocation hearings, for DOL compliance with 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 performance reports by providing uniform report formats and data definitions to grantees across ETA programs. All the HGJTI and CBJTG reports will be submitted to ETA via the Internet. It is left to grantees to select the technology to collect individual case management data according to their unique circumstances and resource availability.

The use of unemployment insurance (UI) wage records as the primary source of data on wages and employment will result in decreased burden hours for many grantees. To minimize their burden further, ETA will continue its financial support of the operation and administrative management of the WRIS, which permits an efficient exchange of UI wage records among states to support federal performance reporting requirements. States and grantees are not charged any fees for using this automated follow-up system.

A.4 Efforts to Identify Duplication

The proposed report is the only report currently required for HGJTI and CBJTG grantees. Other ETA reports may track some HGJTI/CBJTG participants if they participate in other ETA-funded programs.

A.5 Methods to Minimize Burden on Small Businesses

Some small businesses may be contacted to obtain information on participants' outcomes, such as completion of training programs and attainment of degrees and credentials. Grantees can reduce a portion of this burden by collecting information directly from participants.

In a further effort to reduce the burden on small businesses, ETA will not require grantees to obtain post-program employment and earnings information. Instead, grantees will submit a small participant record to ETA, which will use this information to obtain UI wage data to track common measures. This issue is discussed in Section A.7.

A.6 Consequences of Less-Frequent Data Collection

The data are needed both for program monitoring efforts to assist grantees and for external reporting. If grantees do not report quarterly, ETA will be unable to discern problems and identify grantees needing technical assistance. Ultimately, the quality of these programs could be compromised to the detriment of participating workers and employers. ETA's responsibility for reporting, oversight, and monitoring would be hampered because there is no other vehicle for judging program performance for HGJTI and CBJTG. The agency would be unable to fulfill its responsibilities under GPRA or to submit required information to OMB for completion of the PART.

A.7 Special Circumstances for Data Collection

The data collection involves a special consideration for UI wage data to track common measures. Currently, mechanisms are not in place to provide access to wage records for non-state grantees. As specified in Training and Employment Guidance Letter No. 17-05, "For these grantees, supplemental sources of data will be permitted as an interim means of reporting on the earnings measure until all grantees in a program have access to wage records." Any adjustments necessary for using supplemental information as the data source will be addressed in separate program guidance.

A.8 Federal Register Notice and Consultation Outside the Agency

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to submit comments according to the Federal Register notice published on May 30, 2007, Vol. 72, No. 103, Pgs. 30034 and 30035. Comments received and the Agency responses to those comments are below:

Public Comments	Agency Responses
Several commenters expressed concerns with the estimate of time needed to comply with the proposed reporting requirements, indicating that it created burden beyond that estimated by ETA. It is believed that	The cost for modifications to existing systems may be absorbed through existing grant funds. The hourly rates used to calculate cost depend upon the type of organization administering the program.

there would be significant internal costs to existing systems, as well as the time for the collection and compilation of such data. ETA's estimation is $10.75/hr, while two respondents stated that $48/hr is more realistic.	For private nonprofit grantees, we use the estimated hourly rate of the average hourly earnings in the Census Bureau's social assistance industry category (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).
The initial capital outlay will require some programming adjustments that have not been accounted for in the ETA cost estimate.	Because ETA allows grantees to use grant dollars to comply with Federal reporting requirements, for the purposes of the OMB burden estimate, the start-up costs are considered to be $0 per grantee.
Two commenters stated that quarterly is too often to report aggregate data based on the nature of their grant activity. Semi-annually was proposed as an alternative, while one commenter indicated that capacity building activities are best reported annually to best gauge impact.	Quarterly reporting provides for regular communication between the grantee and Federal Project Officer about the progress of the project toward meeting the specific outcomes and deliverables outlined in the grant. With less frequent reporting the agency would be unable to fulfill its responsibilities under GPRA or to submit required information to the Office of Management & Budget. ETA acknowledges that it may be a challenge to measure impact every quarter depending upon the time it takes to complete some grant activities. However, regular updates of the activities occurring is useful information to DOL to help determine the level of progress being made and assistance that may be needed by the grantee.
There were numerous comments from education institutions of higher learning, about the requirement to provide social security numbers for participants. Because the Federal Privacy Act of 1974 makes it unlawful to deny services to individuals who are unwilling to disclose this information, it is felt that the information will be inaccurate or incomplete. One grantee stated they are unsure if the college itself would be able to comply with this reporting change.	ETA has proposed to collect Social Security Numbers (SSN) in order to use these data to match to Unemployment Insurance Wage Records on behalf of the grantees. This match will connect individuals to employment outcomes reflected by the common performance measures, therefore removing the burden of individual follow-up and wage record matching from grantees themselves. Individuals cannot be required to provide their SSN. In order to account for cases where an individual does not provide it, there is a code on the individual record to

	note that an invalid SSN is being used. ETA has several examples of grantees who have intake documents that explain to program participants the purpose of requesting their SSN and what it will be used for in terms of reporting outcomes of the grant resources.
Two commenters stated that too much detail is required in the leveraged resources, timeline for grant activities and best practices and lessons learned based on the large number of partners of their specific grant.	Tracking the amount of leveraged resources outlays is essential to grants management as it tracks the progress of partner commitments throughout the grant. ETA will work with grantees to develop strategies for documenting this information throughout the quarter to lessen the burden of compiling it at the end of each quarter.
One commenter requested for grantees who have successfully demonstrated prior ability to manage other DOL grants is exempt from the new reporting requirements.	Each Federal grant stands alone and carries with it specific reporting requirements that enable the grantee and Federal government to account for the use of public funds. While prior success does demonstrate a grantee's ability to manage grants, it does not preclude the necessity to track grant activities of the existing grant.
Received a recommendation that an official DOL registration form be developed to encourage participants to release their security numbers.	Recognizing that each individual grantee can and should operate its projects according to their needs, it is not the intent or plan for DOL to create a standard registration form. Grantees should explain to participants that their disclosure of social security numbers is voluntary as part of the information collection request. It should be explained that it is being requested to facilitate validation of performance outcomes. ETA will not under any circumstances disclose personal information on individuals served by the grants. Grantees have the option of developing a form if they deem it necessary.
Several commenters expressed concerns with the security of participant data as it relates to the collection, storing and transmittal of social security numbers.	ETA and its contractors are responsible to ensure that the Enterprise Business Support System (used for the transmittal of data from the grantee to ETA) protects the confidentiality of the grant participant and performance data and will maintain the data in accordance with all applicable federal laws. The Department works

	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 agency's on-line grantee reporting system, which will collect personally identifiable data on a quarterly basis. The protection of participant social security numbers (SSNs), which is a key concern, is voluntarily provided by the individual as part of this information collection request. The SSN is being requested to facilitate validation of common measures and to match program participant records with state/federal wage record databases. Any report that will be made public will be aggregated by the grantee or ETA will not reveal personal information on specific individuals.
The state's current data entry system does not differentiate between those who complete and those who drop out to complete a course. A couple of respondents indicated there is no method to show how to determine who dropped out vs. ones completed. This would require a change to the current data entry system or would require manual counts of this activity which would be a burden.	It is ETA's expectation that determining the type of exit of program participants will be a part of its case management procedures as grantees are currently expected to capture the number of participants who completed training. For measuring the success of a course and the students taking it, it is important to capture the different types of exit.
Collection of a NAICS code would require changes to forms and data entry system.	This is likely a new data collection for most grantees and ETA acknowledges the changes necessary. Grant resources can be utilized to make these changes.
A NAICS code does not accurately determine training related employment. There is no way to assign a NAICS code to types of training.	ETA has replaced language in 2c to read: Number placed by Industry. This information can be used as a proxy to say whether or not the majority of people are getting employment in an industry (and occupation) related to the training.

The proposed report format does not capture the breadth of the grantee's project activities that lead up to enrollment in training programs – i.e. capacity building activities that occur in high school classes and preparation that occurs in pre-requisite classes.	Grantees should include descriptions of all activities, including capacity building and course development, can be included in the narrative section of the report.
The proposed report format does not capture program detail for multiple-site projects and will not provide sufficient information for Federal Project Officers to monitor progress toward specific goals since the detail will be lost in the rolled-up totals.	The narrative sections can be formatted by the grantee in such a way as to concisely capture data by project site if the grantee determines that is the best way to report the information.
The proposed format for demographic information makes no provision for reporting unknown or no response when students fail to complete this information on college applications or registration forms. This is a significant problem for projects with multiple partners and many participants in 'non-training' activities, where contact with students to obtain this information is not likely to be possible.	An individual's reporting of Equal Employment Opportunity (EEO) information, such as gender and race, is voluntary. Individuals do not have to provide this information to receive services. While demographic data may not be provided by each participant, the total numbers served will be counted elsewhere in the report.
One commenter suggested that Community-Based Job Training Initiative projects be exempted from the proposed change in reporting requirements since some grantees will be 75% through the funding cycle by the time the new format is implemented.	Recognizing that different grants will be ending at different points in time, ETA is considering which grants to require to implement the reporting system. The ultimate decision will be based on how much time remains for grant activities at the point of approval of the system. Instructions on which grantees are required to adopt the new requirements will be issued by DOL through implementation guidance after receiving approval for the data collection.
One commenter requested that colleges that received grants in 2005 be exempted from the proposed new reporting requirements since it represents a significant change from current practices for CBJT grantees. There is a conflict with Common Measures guidance which provides a time lag for collecting employment information to allow for job seeking and placement. This would cause a revision in grantee systems that would be costly, such as the	ETA will not require grantees to obtain post-program employment and earnings information according to the time periods specified in the common performance measure definitions. The new format would have grantees submit a small participant record to ETA that enables ETA to collect the outcome data for the common performance measures on behalf of the grantees. This will significantly reduce the time burden grantee face currently in

development of a comprehensive exit survey of program completers and follow-up procedures in addition to the process established for Common Measures.	tracking, compiling, calculating, and reporting on the common measures for participants. The narrative reporting form that is proposed is nearly identical to the way many Community-Based grantees are currently reporting.
Regarding the issue of grant activities and deliverables, the effort regarding the identification of products and deliverables for broad distribution to the workforce system will take a significant amount of time and staff support to identify, catalog and prepare such products for mass distribution throughout the workforce system.	As part of the grant agreement, a timeline of activities is established for the submission of product deliverables to ETA upon completion. Grantees are responsible for developing, completing and submitting the products to ETA/DOL on schedule as part of their grant agreement. ETA will assist grantees by providing technical assistance in preparing products for mass distribution. ETA assumes the responsibility of disseminating the products throughout the workforce system.
Information required for capacity building activities and best practices and lessons learned should be reported on an annual basis rather than quarterly. It is not possible to determine whether best practices, innovative processes and lessons learned will occur each quarter.	Quarterly reporting is designed to provide an ongoing update of grant activities and to help grantees prepare for the final summary of grant activities. For the narrative sections, only significant activities that occur are expected to be reported in the quarter in which they occur. Depending on the nature of the grant, some grantees will have more or less to report in a given section each quarter, and can determine when it is appropriate to report out on best practices and lessons learned.
It is more logical to have total participants served before total exiters. New participants served should be clarified. Also address how to verify veteran's eligibility without requesting discharge papers.	ETA will leave the form unchanged since the demographic break-outs correspond with the participant counts. New participants served consist of participants entering the program and receiving services for the first time in the quarter reported. It is considered to be the same as new program enrollees within the quarter reported. Two acceptable forms of veteran's eligibility are: ➤ the Form DD-214 Certification of Release or Discharge from Active Duty and ➤ Veteran's Administration letter or records.

There is no distinction on the form for indicators related to adults, older youth, or younger youth. This would be helpful. Also recommend a release of information comment to share and report data on participants.	Performance for the purposes of the High Growth and Community-Based grants will be calculated for adult common performance measures. Grantees may develop a release of information statement for participants as part of their data collection procedures.
Corrections on data should be allowed for more than one quarter.	The "rolling" nature of the update-able quarters allows the grantee to reflect updates on a regular basis. Systems kept at the grantee level are expected to be maintained and accurate for purposes of audits.
There are no instructions regarding what to do if a social security number is used by more than one individual and how to verify who is accurate. This is common and needs to be addressed.	We do not verify SSNs, we can only encourage that the participant report their SSN accurately. It should be noted that service to a participant is not contingent upon the release of their SSN. The grantee may identify the frequency of these occurrences in their Quarterly Progress Reports to better understand if this is actually a wide-spread issue.
We are required to keep records for seven years for audits. Is DOL assuming the burden of this for audit purposes? Please clarify.	Grantees are expected to assume the burden of maintaining records for their own organization's audit purposes. ETA will maintain records submitted by grantees according to Federal record-keeping requirements.

A.9 Payment of Gifts to Respondents

There are no payments to respondents other than the funds provided under the grant agreement.

A.10 Confidentiality Assurances

ETA and its contractor for the Enterprise Business Support System (EBSS) are responsible for protecting the confidentiality of the HGJTI and CBJTG participant and performance data and will maintain the data in accordance with all applicable federal laws and ETA's Privacy Act Systems of Records. The Department works diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted. All contractors and grantees having 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 agency's on-line grantee reporting system, which will collect personally identifiable data on a quarterly basis.

The protection of participant social security numbers (SSNs), which is a key concern, is voluntarily provided by the individual as part of this information collection request. The SSN is being requested to facilitate validation of common measures and to match program participant records with state/federal wage record databases. Any report that will be made public will be aggregated by the grantee or ETA will not reveal personal information on specific individuals.

A.11 Additional Justification for Sensitive Questions

While grantees will ask sensitive questions of participants in the proposed data collection, for the purpose of collecting demographic data, ETA will only collect aggregate counts as part of the Quarterly Performance Report. Participant responses to these sensitive questions will allow ETA to comprehensively evaluate the effectiveness of the HGJTI and the CBJTG programs.

A.12   Estimates of the Burden of Data Collection

The annual national burden for the HGJTI and CBJTG has two components: (1) the burden for collection of data needed for the quarterly Standard Individual Record (SIR) and for calculation of the quarterly performance report (QPR), and (2) the burden of preparing the QPR. Below we describe the burden related to each of these components.

1) Participant Data Collection Burden.

The participant data collection burden considers the amount of participant information collected for the SIR. It also includes the additional data needed to calculate the QPR. Thus the burden reflects the information collected solely to comply with the federal reporting requirements. This estimate does not include the burden associated with data that grantees would have to collect as part of their customary and usual burden to run the program. It also does not include the burden associated with the collecting and reporting information required to meet EEO requirements, which is covered under a separate estimate. We present annual figures for the HGJTI and CBJTG estimates separately and then combined.

Program	Estimated Annual National Counts of Participants	Applicable Estimated Hourly Rate	Estimated Minutes per Record	Annual National Burden Hours	Annual National Burden Dollars (hours*rate)
HGJTI	100,000	$10.75	6	10,000	$107,500
CBJTG	130,000	$10.75	6	13,000	$139,750
Total	230,000	$10.75	6	23,000	$247,250

We assume that grantees will spend 0.6 minutes to collect each element. For the purposes of reporting, grantees will need to collect 10 data elements per participant: the 4 elements included in the SIR record layout and 6 additional elements needed to calculate the QPR. This leads to an estimate of 6 minutes per record. The hourly rates used to calculate cost depend upon the type of organization administering the program. For private nonprofit grantees, we use the estimated hourly rate of the average hourly earnings in the Census Bureau's social assistance industry category (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

For the purposes of determining the counts, we used the following assumptions:

- **For the HGJTI, we used the current number of participants (about 100,000).**

- **For the CBJTG, we assumed 70 grants per year and 65,000 participants per 70 grants. Averaged over a 3-year period, the result is 130,000: [(65,000 × 3 years) + (65,000 × 2 years) + (65,000 × 1 year)] ÷ 3 years.**

2) Quarterly Performance Report Burden.

The HGJTI and CBJTG quarterly report burden includes the burden to produce both the QPR and its report narrative. The burden to calculate the QPR includes program run times, checking, formatting, and transmitting the quarterly performance reports to ETA. This burden also includes the preparation and submission of the grantees' SIR records. The burden to produce the report narrative includes the time it takes to write, review, and submit the report. Each of the four quarterly reports will require about 28 hours to prepare, generating an annual burden of 112 hours per grantee. This assumes 12 hours for the QPR and SIR submission, and 16 hours for the narrative report. We assume 132 High Growth grants, which is based on the current number of grants, and 140 Community-Based grants, which is based upon 70 grants per year, with each grant lasting 3 years. Hence, the total annual burden is 30,464 hours, or $327,542.

Program	Estimated Hours per Year per Grantee	Estimated Annual Number of Reporting Grantees	Annual National Hours	Applicable Estimated Hourly Rate	Estimated Annual National Burden Dollars (hours*rate)
HGJTI	112	132	14,784	$10.75	$158,928
CBJTG	112	140	15,680	$10.75	$168,560
Total	112	272	30,464	$10.75	$327,488

A.13   Estimated Cost to Respondents

1) Start-up/Capital Costs

The start-up cost estimate is based on the assumption that grantees will need to develop some systems to track the participant and produce the quarterly performance report. The

estimate does not include any burden associated with the development of systems needed for case management or grantees' own program management purposes. Because the grants allow grantees to use grant dollars to comply with Federal reporting requirements, for the purposes of the OMB burden estimate the start-up costs are considered to be $0 per grantee. It is estimated that each grantee will need 120 staff hours to develop tracking and reporting systems. Multiplied by 272 grantees, this yields a total national start-up cost of 32,640 grantee staff hours.

2) Estimated Annual Costs

Summing the burden associated with the participant data collection and quarterly performance reports, the total annual burden estimate for all grantees is 53,464 hours and $574,738 (see table below). The estimated cost has been calculated at an hourly rate of $10.75 for grantee staff. These costs are captured in Item 12 above.

Operating/Maintenance Burden Component	Annual National Burden (Hours)	Average Annual National Cost
Participant Data Collection	23,000	$247,250
Quarterly Performance Report	30,464	$327,488
Total	**53,464**	**$574,738**

A.14   Estimates of Annualized Costs to Federal Government

ETA will collect and maintain all quarterly reports through its Office of Performance and Technology's on-line Enterprise Business Support System (EBSS). Since the electronic mechanisms for collecting and storing grantee performance data on a quarterly basis are already in place to support other ETA programs, the annualized cost to the Federal government to incorporate the HGJTI and CBJTG reports will be minimal. The annual cost of maintaining the quarterly reports and records through EBSS, matching SIR data with state UI wage records and other Federal employment databases, and generating quarterly performance reports for each grantee based on the common measures is estimated to be $115,000.

For the quarterly performance report, it is estimated that staff spend 15 hours per quarter (60 per year) monitoring the data, providing technical assistance for grantee report submissions, preparing special aggregate reports for internal program management purposes, and generating specific responses to Congressional and other inquiries. Using an average hourly staff rate of $38.04, the estimated annual cost to the Federal government is $2282.

The total estimated annual cost to the Federal government for this data collection is $117,282. The hourly rate used to calculate cost is the average for a GS-13 (Step 1) employee in the Federal service (based on 2007 GS locality pay schedules http://www.opm.gov/oca/07tables]).

A.15   Changes in Burden

There is no prior burden estimate because this reporting requirement is new.

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

ETA will handle collection, storage, and publication of HGTI and CBJTG reports internally. The reports for each quarter will be due within 30 days of the end of the quarter. ETA will compile reports every quarter and for every program year. Data will be published as part of the Department of Labor's annual report each year.

Product	Submission Date	Publishing Date
HGJTI and CBJTG Reports	Within 30 days following the end of each calendar quarter	ETA intends to use this information to prepare reports for GPRA, budget, and performance management purposes on a quarterly and an annual basis.

A.17   Approval Not to Display OMB Expiration Date

The expiration date for OMB approval will be displayed. Once OMB approval is received, ETA will issue a Training and Employment Guidance Letter that will formally transmit to grantees the reporting package that includes the following statement: "It is estimated that, on average, the time needed per respondent to complete and submit the data collection and quarterly reports will be 85 hours annually for participant data collection and 112 hours annually for quarterly performance reporting. You may submit any comments regarding these reporting documents to: The Performance and Results Office, U.S. Department of Labor, Employment and Training Administration, 200 Constitution Avenue, NW Room N5306, Washington, DC, 20210. Please include Paperwork Reduction Act 1205-0NEW with your correspondence."

Form/Activity	Estimated Annual National Burden (Hours)	Estimated Total Respondents	Estimated Average Annual Hours Per Respondent
Participant Data Collection	23,000	272 grantees	85
Quarterly Performance Report	30,464	272 grantees	112
Total	53,464		197

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

None.