

**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 Prisoner Reentry Initiative (PRI). 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 the faith-based and community organization (FBCO) grantees or their subgrantees.

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 employment training and placement services, housing assistance, mentoring, and other services essential to reintegrating ex-offenders through PRI 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

The Prisoner Reentry Initiative is a Workforce Investment Act (WIA) demonstration grant designed to reduce recidivism by helping inmates find work when they return to their communities. PRI programs incorporate employment training, mentoring, housing assistance, and other reintegration services in coordination with businesses, One-Stop Centers, educational institutions, local housing authorities, and the criminal justice system. In addition to reporting participant information and performance-related outcomes, PRI grantees must demonstrate their ability to establish effective partnerships with the criminal justice system, local Workforce Investment Boards, local housing authorities, and other partner agencies. They must also demonstrate the cost effectiveness of their projects. The reporting and recordkeeping system incorporates each of these aspects necessary for program evaluation.

Five outcome measures will be used to measure success in the PRI grants: entered employment rate, employment retention rate, attainment of a degree or certificate, average six month post-program earnings, and recidivism rate. Several of these conform to the 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 five 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, reduced substance abuse, proportion of enrollees in stable housing, and proportion of enrollees complying with parole conditions.

In applying for the PRI grants, FBCOs and their sub-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 PRI performance data using an ETA-provided MIS. The MIS will be a web-based case management and reporting application housed on ETA's servers.

As described in WIA Title I section 172, which addresses evaluation criteria of demonstration projects such as PRI that are authorized under section 171(a-b), the PRI data will be evaluated by ETA to determine program effectiveness. This evaluation will include the extent to which the PRI program improves the employment competencies of participants in comparison to comparably situated individuals who did not participate in the program, and the extent to which the PRI program increases the level of employment over that which would have existed in the absence of the program [section 172(a)(1)(A)].

WIA section 172(a) further specifies that the evaluations must address:

- effectiveness of the performance measures relating to such programs and activities
- effectiveness of the structure and mechanisms for delivery of services through such programs and activities
- impact of the programs and activities on the community and participants involved
- impact of such programs and activities on related programs and activities
- extent to which such programs and activities meet the needs of various demographic groups
- such other factors as may be appropriate

WIA section 185 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.

WIA section 189(d) 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 PRI programs and their partnerships with One-Stop Centers, local Workforce Investment Boards, employment providers, the criminal justice system, and the local housing authority. These data will be used by the Department and ETA to evaluate performance and delivery of PRI 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 PRI.

ETA will use the data to track total participants, characteristics, services, and outcomes for

released prisoner participants. Additionally, ETA will analyze the data to (1) determine the delivery of core employment services within the WIA framework; (2) study performance outcomes vis-à-vis performance measures, policies, and procedures; and (3) help drive the workforce investment system toward continuous improvement of outcomes and integrated service delivery for released prisoners. Common measures will enhance ETA's ability to assess the effectiveness of the PRI program within the broader 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 PRI 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 services and mentoring provided by multiple agencies to help participants get and keep well paying jobs and obtain stable housing; (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 PRI 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 who 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 demonstration programs would be compromised. In applying for PRI grants, grantees agree to meet ETA's reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY-04-08), 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 Pre-Clearance Notice was published in the Federal Register on September 23, 2005 (Vol. 70, No. 184, Pages 55922 – 55924). Following the 60-day comment period, the Department received written comments from three Federal Agencies and one faith-based PRI grantee. A summary of the comments received and the Department's responses can be found below.

Public Comment Summary	Agency Response
One commenter suggested DOL include a data element for each service that tracks the type of service provider providing the service (i.e., faith-based, community-based, or public organization) so DOL can better track the service provider types.	DOL agrees that it would be valuable to track such additional information and has added the ability through a new data element called "provider type" after each service type in order to track such information in the PRI data element record layout.
One commenter identified that DOL collects mentoring activities in section D4 of the report and follow-up mentoring activities in D5 of the report. The commenter suggested we change this to pre-release mentoring and post-release mentoring.	DOL is not collecting pre-release services, as the DOL PRI grants only provide services post-release. The difference between the two types of mentoring is the one in D4 is mentoring that occurs prior to exit from the program, whereas the D5 mentoring occurs following exit, during the

	follow-up phase of the program.
One commenter suggested DOL consider adding short-term indicators relating to a participants' family life such as the number of reported incidents of domestic disturbance and the number of payments of child support made.	The suggested indicators would be very difficult data elements to capture, would not be reliable data, and would significantly increase the data collection burden of the grantee. In addition, DOL does not want to enter into the business of child support enforcement. DOL did not add these data elements.
Two commenters suggested distinguishing between re-arrested for a new crime and re-incarcerated for a revocation of parole or probation for violations of terms of sentence. In addition, one commenter suggested DOL allow for a change in status if a participant is re-arrested, but released (i.e., the charges are not substantiated).	DOL has added two new lines to section E of the report: 9a: Number of re-arrests for a new crime and 9b: Number or re-incarcerations for revocation in order to distinguish between these two types of recidivism. In addition, DOL has added a new data element called re-arrested and released for those participants who are re-arrested but charges are not substantiated. DOL has also revised the recidivism specification to not include a participant who was re-arrested but subsequently released rather than convicted.
One commenter suggested adding health services to the list of services provided by grantees since health issues are a major barrier for released prisoners and despite the fact that PRI grantees cannot pay for substance abuse and mental health treatment with DOL grant funds, these services are encouraged to be provided through other funding sources. The commenter also suggested adding a data element collecting whether or not the participant has significant health issues.	DOL added a data element called "health issues" to collect whether or not a participant has significant health issues. In addition, DOL added a service category to section D of the report called "received health services" that includes substance abuse treatment, mental health treatment, emergency medical care, non-emergency medical care, and other health services.
One commenter suggested adding the option of "separated" to the list of options for the marital status data element.	DOL added "separated" to the list of options for the marital status data element.
One commenter suggested differentiating between family-based mentoring and individual mentoring in the data collection system.	DOL is focusing its mentoring component on the individual and will only collect whether or not the individual received mentoring.

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 PRI 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 PRI system.

A key concern is for the protection of participant social security numbers (SSNs), which is voluntarily provided by the individual as part of this information collection request. The SSN is being requested in order for grantees to properly determine that the individual is eligible to participate in the PRI program, ensure data integrity, and, to the extent practicable, track program participant outcomes through state wage record systems. The PRI system will also include a statement that informs the individual where the information he/she has provided is being stored, the name and location of the system, and that the information is protected in accordance with the Privacy Act. When participant files are retrieved within the PRI system, only the last four digits of the social security number will be displayed. Any information that is shared or made public is aggregated by grantee and does not reveal personal information on specific individuals.

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 PRI program.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the PRI reporting system has three components: (1) the participant data collection burden; (2) the quarterly narrative progress report burden; (3) the quarterly performance report burden; and 4) The quarterly financial report burden for SF 269. This response provides a separate burden for each of the three components.

(1). Participant Data Collection Burden

The PRI *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 and its partnerships with One-Stop Centers, local Workforce Investment Boards, employment providers, the criminal justice system, and local housing authorities. For example, data collection may involve acquiring information from the various partner agencies regarding employment training and placement, housing assistance, mentoring, parole, and probation, in addition to the collection of personal and demographic information by the grantees themselves.

Record Type	Hrs. Per Record	PY 06 Estimated National Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Participant	1.8	6,250	11,250	\$10.75	\$120,938

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 PRI *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	30	1,920	\$10.75	\$20,640

(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	30	1,920	\$10.75	\$20,640

4) The *quarterly financial report burden* (SF-269).

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly SF 269	2	30	60	\$10.75	\$645

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 \$750,000. 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

After the 60 day Federal Register Notice was published, the burden for the SF-269 was calculated and added to the 83-I for this ICR. Because 30 grantees will submit the SF-269 online four times per year, and the burden for each of the four times is .5 hours, the revised total annual burden is 15,550 hours, reflecting the addition of 60 hours. (See A.12 above.)

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 PRI 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.

Product	Submission Date	Comments
Quarterly Narrative Progress Report	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.
Quarterly Performance Report	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 PRI reporting requirements will be 375 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). Please include Paperwork Reduction Act 1205-0NEW with your correspondence.”

Form/Activity	Total Annual	Total	Average Annual
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	Burden/Hours	Respondents	Hours/Respondent
Participant Data Collection	11,250	30 grantees	375
Quarterly Narrative Progress Report	1,920	30 grantees	64
Quarterly Performance Report	1,920	30 grantees	64
Total	15,090	30 grantees	503

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.

APPENDIX A - Attachments

Attachment A – PRI Reporting Handbook

Attachment B – Relevant Statutory/Regulatory Provisions

Attachment C – Federal Register Notice