

MODIFIED PAPER WORK REDUCTION PACKAGE

**THE SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM
(SCSEP)**

Supporting Statement A

JUSTIFICATION

Introduction: This package contains revised program performance reports for the Senior Community Service Employment Program (SCSEP). The previously approved package permitted implementation of the Older Americans Act (OAA) Amendments of 2000. That request reflected information collection requirements contained in the Final Rule submitted to OMB on December 24, 2003. The 2007 request was for approval of modified forms necessitated by the reauthorization of the SCSEP legislation (2006 Amendments to the Older Americans Act, Public Law 109-365) and the requirement to publish changes to Internet-based SCSEP Performance and Results QPR (SPARQ) system that went into effect on July 1, 2007.

This request for a non-substantive change to the 2007 submission is to correct for an inadvertent omission of a burden calculation for the four-year state strategy required of SCSEP state grantees.

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and or regulation mandating or authorizing the collection of information.**

| <i>FORM</i> | <i>LEGISLATIVE CITATIONS OAA-2006</i> | <i>REGULATORY CITATIONS</i> |
|---|---|------------------------------------|
| Participant, Community Service Assignment, Exit, Unsubsidized Employment | Sections 502(a)(1), 502(b)(1)(C), 502(e), 503(f), (g) | 641.879(a) 641.700 |
| Quarterly Financial Report (SF-269) | 503(f)(3) | 641.879(b) |
| SCSEP Equitable Distribution Report | Sections 507(a), (b), Section 508 | 641.325(a), 641.360, 641.879(c) |
| Application for Federal Assistance & Budget Information Sheet (SF-424) | Section 502(b)(1), Section 503 (f)(2) | 641.410(a), (b) |
| Customer Satisfaction Surveys | Sections 513, 514, 502(e), 503(f), (g) | 641.710 |
| | | |

The SCSEP is funded for approximately \$483 million for PY 2007 and provides over 60,000 positions in which over 90,000 low-income persons aged 55 or older are placed in community service employment every year. Over 22,000 people are annually placed from the program into the ultimate goal of unsubsidized placement.

To ensure that the Senior Community Service Employment Program is properly administered, and to implement the performance measures and sanctions authorized by the 2006 Amendments to the OAA (OAA-2006), it is necessary to modify the existing data collection forms. In addition, a collection of information is required under OMB Memorandum M-02-06, which has been adopted by the Department of Labor (the Department). This requirement necessitates a collection of information to implement the Administration's common performance

measures. The legal authority for the collection of additional information may be found at sections 503, 508, 513, and 515 of the OAA-2006.

NOTE: Copies of the relevant data collection forms maybe found in ROCIS. For forms that have changed since the SCSEP 2006 submission, **yellow** indicates an existing field that has had a text change only. The field still collects the same data element. There is no additional burden because the element is the same. **Yellow** is also used to note re-numbering or re-lettering of elements, especially when elements have been deleted, as is the case with the CSA Form. **Turquoise** indicates a field that is on the last approved version of the form but is now being used to capture a different data element. There is no additional burden because the new element replaces the old element. **Red** indicates a new element.

In addition, we have used an asterisk (*) to add a footnote to those fields that are system-generated by SPARQ and thus do not involve any data entry by the user. The fields remain on the hard copy forms so that users can have complete hard copy records if they wish, but users are not required to enter any information into these fields.

2. Indicate how, and by whom, and for what purpose the information is to be used. Except for a new collection indicate the actual use the agency has made of the information received from the current collection.

The Department has used the QPR (ETA 5140) for 27 years to record information on SCSEP program participants and to measure progress toward agency goals and objectives. The Department uses the information to manage the program and to report program results to the public and the Congress.

- OAA-2006 created revised reporting requirements. These requirements continue the collection of information that can be used to measure performance against program goals. The information is used to implement corrective actions should performance prove inadequate. Corrective actions for state grantees under the OAA-2006 may include a reallocation of the grantee's funding to another entity. National grantees may be barred from participation in the next SCSEP competition if they fail to meet their aggregate goals for three successive years. There is no longer a burden associated with the ETA-5140 because grantees are no longer required to submit the QPR. SPARQ generates the ETA 5140 from participant records maintained and submitted by the grantees.
- Section 503 of OAA-2006 provides for a single State Plan that outlines a 4-year strategy for the statewide provision of community service employment and other authorized activities for eligible individuals, which requires the Governor to solicit public involvement in the development of the Plan. ETA Form 8705 (see below) is used to determine the location of the SCSEP-eligible population and compares it with the actual location of program positions. The differences between the proportional share and the actual share form the basis for much of the State Plan activity. Among the agencies involved in preparing the State Plan are Workforce Investment Act (WIA) agencies, Area Agencies on Aging, community service agencies, and the SCSEP national grantees operating in that state. The purpose of the State Plan is to ensure that States address the employment situations and skills of the eligible population.
- The Equitable Distribution Report (ETA 8705) has been required by the program for over 20 years. It remains a requirement under section 508 of OAA-2006, which requires state grantees, in conjunction with national grantees operating in the state, to submit a report that details an equitable allocation of SCSEP resources within the state based on county-

by-county data showing the number of SCSEP-eligible persons in the population from the most recent U.S. Census. The Equitable Distribution Report remains unchanged from previously submitted versions.

3. Describe the collection of information involving the use of automated, electronic, mechanical, or other technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

- The Department has required grantees to submit data electronically in order to reduce costs and improve the quality. To accommodate the collection of information on the revised performance measures and the common measures, the Department in 2004 provided grantees with a software program – the Data Collection System (DCS) – that allowed them to collect participant data through their existing systems. In some cases this was the first electronic database used by grantees. One immediate effect of the implementation of the DCS was the elimination of the requirement for grantees to produce Quarterly Progress Reports. These are now automatically generated by the DCS software. The final step in the evolution of SCSEP performance reporting is the Internet-based SCSEP Performance and Results QPR (SPARQ) system, which was launched during Program Year 2004. ETA is confident that, as the system is refined, the overall reporting burden for grantees will be reduced.
- The ETA 8705 (Equitable Distribution Report) is submitted electronically by the states as an Excel spreadsheet.
- In conjunction with the Department's e-grants initiative, ETA is developing systems that will allow an increasing number of grant applicants to apply on-line for grants and grant renewals.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use the purposes described in Item 2 above.

The SCSEP is a discrete program authorized by title V of OAA to promote part-time community service employment and to foster individual economic self-sufficiency, thereby increasing the numbers of participants who obtain unsubsidized employment. The information collected includes participant personal characteristics, community service and employment records, statistics such as dates documenting progress through the program, and post-program follow-up information. Moreover, many of the performance measures that are required by this program are not collected by any other program and are uniquely defined.

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

Although small entities (generally non-profits) are active partners in the provision of community services and act as host agencies to program participants, these entities are usually not actively engaged in the reporting process. Thus, they are not likely to be aware of the revised reporting requirements. The exception is that some small private employers and host agencies may be chosen to receive customer satisfaction surveys. Response to these surveys is, however, voluntary.

6. Describe the consequence to the Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

- The OAA-2006 changed SCSEP by not only revising the performance measures but also requiring the Department to implement corrective action if grantees performance falls below specified negotiated levels. By requiring performance data, the interests of the grantees are protected, because these reports permit them to monitor their program progress. Moreover, Quarterly Progress Reports allow the Department to monitor grantee progress toward goals and provide timely assistance to the grantees if needed.
- If the collection of information under the Administration's common performance measures initiative is conducted less frequently, it would be contrary to the definitions provided for the measures and inconsistent with the actions of other Federal agencies and other programs within the Department.
- The Equitable Distribution Report is required annually by the OAA-2006. Failure to collect this information would be contrary to the legislation.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **more often than quarterly**
- **requiring a written response to an information collection in fewer than 30 days**
- **requiring more than an original and a copy**
- **requiring record retention longer than 3 years**
- **in connection with a statistical survey that is not designed to produce results which can be generalized to the universe of the study**
- **utilizing statistical data that has not been approved by OMB**
- **a pledge of confidentiality**
- **revealing a proprietary trade secret**

It is not likely that any of the situations described above will occur. This collection of information complies with 5 CFR 1320.5.

8. Consultation Efforts

In a Federal Register Notice (Volume 72, Number 26) published on February 8, 2007, DOL solicited stakeholder input on implementation of the performance indicators. A summary of the resulting comments has been included with the Supplementary Documents of this ICR, and these have received consideration in the just-published Interim Final Regulations on performance measurement.

The preamble to the Interim Final Rule, in accordance with the Paperwork Reduction Act of 1995, will allow the public 60 days to review and comment on the package which will be published in June of 2007. The Notice of Proposed Rule Making, due to be published in August of 2007, will provide an additional opportunity for public comment.

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

SCSEP grantees are forbidden from providing any remuneration other than the normal wages for community service work in host agencies.

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

Basic confidentiality rules relating to privacy apply, and 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 PROTECH department has been an active participant in the development and approval of data security measures – especially as they apply to the Internet-based version of the data collection system (SPARQ).

A key concern is for the protection of participant social security numbers. Grantees must collect the social security number in order to properly pay participants for their community service work in host agencies. When participant files are sent to DOL for aggregation, the transmittal is always protected by secure encryption. When participant files are retrieved within the SPARQ system, only the last four digits of the social security number are displayed. Any information that is shared or made public is aggregated by grantee and does not reveal personal information on specific individuals.

In addition to the above, a Privacy Act Statement (see Supplementary Documents in ROCIS) is provided to grantees for distribution to all program participants. Participants receive this information when they meet with a case worker or intake counselor. When the programs are monitored, implementation of this item is included in the review.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, and the explanation to be given to persons from whom the information is requested, and any steps taken to obtain their consent.

Questions of a sensitive nature include self-identification of a disability. Applicants must be informed that EO information – gender, ethnicity, race, and disability – is voluntary and that the refusal to provide it will have no effect on any decision to provide services to them. The collection of this information is similar to other programs such as WIA and complies with the requirements of the Americans with Disabilities Act.

12. Provide estimates of the hour burden of the collection of information.

The 2007 increase in burden hours by 1771 for the SCSEP program was an overall result of two factors. First, the performance measure changes in the statute required changes to the SCSEP data collection forms, which then required a small burden adjustment. Second, the SCSEP has increased from 13 grantees to 18 following the competition of 2006. That means more grantees are reporting data on more participants than in the past, thus increasing the total number of responses.

The 2007 Supporting Statement, #12A, has been revised to account for an inadvertent omission of the grantee portion of the burden for the four-year state strategy referred to in Item 2 of the Supporting Statement. All state and territorial grantees are required to submit a four-year senior community service and employment strategy as described in item #2 above. This plan needs to be up-dated at least every two years. Based on informal conversations with grantees of all sizes, the Department estimates that each grantee is

devoting an average of 14.5 hours per year over the four years covered by the strategic plan. With 56 state and territorial grantees formulating or updating the plan an average of twice every four years, ETA estimates a total of 28 responses annually, for an hour burden of 406 hours per year (28 submissions x 14.5 hours).

The chart below includes the grantee burden calculation for the four-year state strategy in the overall calculation totals.

1205-0040 - Senior Community Service Employment Program -- REVISED BURDEN HOUR ESTIMATES (July 1, 2008)

| Cite Reference | Total Respondents | Frequency | Total Responses | Average Time per Response | Burden Hours |
|---|-------------------|---------------------|-----------------|---------------------------|---------------|
| Participant Form – ETA-9120 | 74 | Ongoing | 106,000 | 12 mins. | 21,200 |
| Community Service Assignment Form – ETA-9121 | 74 | Ongoing | 110,000 | 5 mins. | 9,167 |
| Unsubsidized Employment Form – ETA-9122 | 74 | Ongoing | 22,000 | 11 mins. | 4,033 |
| Exit Form – ETA-9123 | 74 | Ongoing | 55,000 | 2 mins. | 1,833 |
| Equitable Distribution Report Form – ETA-8705 | 51 | Annually | 51 | 10 hrs. | 510 |
| Participant Customer Satisfaction – ETA-9124A | 14,000 | Annually | 14,000 | 10 mins. | 2,333 |
| Host Agency Customer Satisfaction – ETA-9124B | 13,000 | Annually | 13,000 | 10 mins. | 2,167 |
| Employer Customer Satisfaction – ETA-9124C | 4,400 | Annually | 4,400 | 8 mins. | 587 |
| Financial Status Report – SF-269 | 74 | Quarterly and Final | 370 | 1 hour 15 mins. | 463 |
| Grant Planning – SF-424 | 74 | Annually | 74 | 3 hours | 222 |
| Grant Planning (Budget) – SF-424A | 74 | Annually | 74 | 25 hours | 1,850 |
| State Four-Year Strategy | 56 | Bi-Annually | 112 | 14.5 hours | 1,624 |
| <i>SUB-TOTAL ETA FORMS / Requirements</i> | <i>////</i> | <i>////</i> | <i>325,077</i> | <i>8.5 mins.</i> | <i>45,989</i> |

Note 1: Each of the above forms (with the exception of the ETA-8705) has two separate ICs in ROCIS because each is associated with two different affected publics. Therefore, each of the burden hour totals for these forms in the table above has two separate sub-totals in the ICR. The final total burden in ROCIS matches the final total (45,989) in the table.

Note 2: The total estimated number of respondents is calculated based on 74 state and national grantees for most reports, a combined 31,400 customer satisfaction survey respondents, and 50 states and one territory for the equitable distribution reports.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life); and (b) a total operation, maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, disclosing or providing the information. Include descriptions of methods used to estimate cost factors including system and technology acquisition expected useful life of the equipment. Capital and start-up cost include preparation for collecting information: such as purchasing equipment and record storage.
- If cost estimates are expected to vary widely, agencies should present ranges and explain the reasons for the variance. The cost of purchasing or contracting out the information collection services should be a part of this cost burden estimate. In developing cost burden estimates the 60-day pre OMB submission public comment process and use existing economic and regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchase of equipment or services or portions thereof unless they are for the specific purpose of the collection of the additional information.

The SPARQ application does not require any software more advanced than Windows 98. The application is designed to run on computers with IBM-compatible hardware capacity and broadband Internet access. All grantees and sub-grantees currently have the equipment necessary to operate the application. Grantees need not incur any additional ongoing costs, although there may be some minor costs (covered by grant funds) associated with training grantee staff to use the new system. The data collection application is provided free to all grantees (and sub-grantees) that wish to use it. Grantees that wish to modify their existing automated systems to report the required data rather than use the SCSEP application will incur the cost of modification. Because all grantees could use the SCSEP application without any cost, the Department does not consider the cost of modifying existing automated systems to be a cost burden resulting from the SCSEP system.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses, and other expenses that would not have been incurred without this collection effort. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Costs to the Federal Government of the SPARQ System

| Report | Federal Review Hours | Average Hourly | Number of Reviews | Total |
|--------------------------------------|----------------------|----------------|-------------------|----------|
| Quarterly Progress Report (ETA-5140) | 0.5 | \$37.50 | 370 | \$6,938 |
| State Four-Year Strategy | 5 | \$37.50 | 54 | \$10,125 |
| Equitable Distribution Report | 2 | \$37.50 | 54 | \$4,050 |

| | | | | |
|--------------------------------|-------------|-------------|------------|-----------------|
| (ETA-8705) | | | | |
| Grant Application 424, 424A | 8 | \$37.50 | 74 | \$22,200 |
| TOTAL: | 15.5 | //// | 552 | \$43,313 |

Note 1: The estimates above are based on past experience in reviewing the reports but also include judgments on the time needed to analyze the revised performance measures and review other new requirements. They are based entirely on estimated staff time needed to review the reports. The average hourly cost for Federal staff members who review reports is the one used in the previous submission. The cost associated with the QPR includes time to review the performance measures and common measures.

Note 2: In addition to the above ongoing costs, the ETA has sustained contractor costs of \$2.2 million in 2006/7 for data specification, developing and testing the SPARQ software, and providing training and technical support to grantees using the system. These costs have been fully funded through the use of SCSEP recaptured grant funds.

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

Revised forms have been necessitated by the 2006 reauthorization of the Older Americans Act. The four data forms are electronic and are the basis for the program's Internet-based data collection system – the SCSEP Performance and Results QPR (SPARQ) system. In addition, ETA has agreed to grantees' requests for enhanced case management functionality in SPARQ. The total burden increase is 1771 hours. Because the 2006 OAA necessitated changes in many of the SCSEP forms previously used by grantees, in July, 2007, the Department submitted to OMB for review and approval in accordance with sec. 3507(d) of the PRA a modification to the SCSEP information collection requirements. The four-year strategy newly required by the 2006 OAA (see § 641.302) was accounted for in that PRA submission. The SCSEP PRA submission was assigned OMB control number 1205-0040 and was approved by OMB in October 2007. The approval expires October 31, 2010. The following proposed rule neither introduces new nor revises any existing information collection requirements.

16. For the collection of information results that will be published, outline plans for the tabulation, and publication. Address any complex analytic techniques that will be used.

In general, information from the QPR (ETA 5140) will not be published by the Department – although it is sometimes published by others and shared with the grantees. The Department may publish on its Web site the performance results of each grantee. The State Plan will be publicly presented for comment by individual states in accordance with each state's comment process. Such processes may include publication in local newspapers or on the state's Web site.

The QPR uses no complex calculations. Results are generally tabulated as sums, averages, or percentages.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be appropriate.

ETA will display the OMB control number and the expiration date on all approved forms.

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

N/A