

Justification for Non-Substantive Burden Calculation Adjustment

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 updated 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).