

**(1205-0455) 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 to extend approval for the 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 is 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 are 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 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 collect and report quarterly PRI performance data using an ETA-provided MIS. The MIS is 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 is evaluated by ETA to determine program effectiveness. This evaluation includes 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 carry out recordkeeping and reporting requirements with grant funds. As a government-procured MIS is 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 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 are 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 allows grantees to collect additional participant data beyond those elements required by PRI.

ETA uses the data to track total participants, characteristics, services, and outcomes for released prisoner participants. Additionally, ETA analyzes 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 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 are 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 is 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 are 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

The public was given an opportunity to review and comment through the Federal Register notice process. The notice was published in the Federal Register on July 17, 2008 (Vol. 73, No. 138, p. 41126 et seq.). No comments were received.

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 maintaining 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 also includes 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 are 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 is built into the data collection system by the MIS contractor. Participant responses to these sensitive questions 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; and (3) the quarterly performance report burden. This response provides a separate burden for each of the three components. In addition, a separate burden is provided for ETA-9140-A, a small related grant program using essentially the same fields as ETA 9140 and approved by OMB on November 30, 2007 (See OMB reference number 200708-1205-0006).

(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 data collection burden varies 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, the grantee programs run by the U.S. Department of Justice, 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.

To arrive at the average annual figure of 1.8 hours per participant record, Mathematica, the contractor which computed the original data for this submission when it was a new initiative, assessed the time for entries based on scenarios postulating a variety of services possible for a range of anticipated participants. This information, in turn, was based on similar programs of this sort, including Justice Department programs.

Finally, PRI program managers consulted with grantees who have collected this information over the past several years to verify that 1.8 hours, as an average figure devoted for MIS for the estimated 6,610 participants, averaged out among the grantees, represented the best estimate of time devoted to data entry for each participant, given the range of entries anticipated for each participant, as described above. These grantees affirmed this estimate.

Regarding the estimated 6,610 participants for 2008, it is noted that the grantees are in different years in their grants, and those in the final drawdowns are serving fewer participants than those in their initial years of grant funded activity. To estimate the participants for 2008, the initiative's efficiency measure of \$3,000 expended per participant was compared with the program's anticipated funding level, which determined the number of those who could be served by each grantee. This estimate of the number of participants served through this grant program, is also based on the MIS data collected thus far. By dividing the estimated 6,610 participants among the 74 current grantees, one arrives at the average per grantee, given the broad range of years into the grant and range of activities and number of potential participants represented by each grantee, of 89.324 persons per grant: $6610 \div 74 = 89.324$.

Estimated National Count:

Record Type	Av Hrs. Per Record	PY 08 Estimated National Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Participant	1.8	6,610	11,898	\$10.75	\$127,904

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. Information to be

included in this quarterly narrative report is laid out in the PRI Solicitation for Grant Application (SGA) and concomitant grant documents.

Report	Av Hrs. Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Narrative Progress Report	64	74	4,736	\$10.75	\$50,912

(3). Quarterly Performance Report Burden ETA – 9140

The **quarterly performance report burden** assumes that all grantees 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.

ETA 9140 Report	Av Hrs Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Dollars
Quarterly Performance Report	16	74	1,184	\$10.75	\$12,728

TOTAL ANNUAL HOURS, Narrative and Quarterly Performance Reports, 74 Grantees

64 hours + 16 hours = 80 hours annually OR 20 hours quarterly.

Grantees: 4 (times per year) x grantees (74) = 296 responses.

Burden Hours: Add 4,736 to 1,184 for a total of 5,920 for quarterly reporting.

ETA 9140 Report and Narrative Report	Av Hrs Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Dollars
Narrative and Quarterly Performance Reports	80	74	5,920	\$10.75	\$12,728

4. Quarterly Performance Report Burden, ETA 9140-A: ETA 9140-A, a slight variation of ETA-9140, is being used by a grant program, Beneficiary-Choice Contracting program, affiliated with this program.

Similarly, the hours estimated to complete ETA9140-A are 4 hours. There are five participant grantees in the Beneficiary-Choice Contracting program; therefore, 4 quarterly reports x 5 grantees = 20 responses annually x 4 hours.

Report	Av Hrs Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Dollars
Quarterly Performance Report	16	5	80	\$10.75	\$860.00

For both programs, ETA 1940 and ETA 1940-A, the hours to complete the form is 4 hours. There are 74 grantees using ETA-9140. Therefore, the 74 participant grantees in the PRI program, filling out 4 quarterly reports, = 4 hours x 4 (times per year) x 74 (grantees), resulting in an estimated total of = 1,184 hours.

Thus, the grand total of grantees for both programs, PRI (including participants) and Bene-Choice, is currently 6,610 + 74 + 5 = 6,926. Annual hours are a grand total of 11,898 (Participants) + 5,920 (PRI) + 80 (Bene-Choice), or 17,898 responses.

A.13 Estimated Cost to Respondents

- a) **Start-up/capital costs:** There are no start-up costs, as ETA provides 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 is 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 MIS system is fully developed and these costs have been absorbed. The annual costs of maintaining the system and developing training and technical assistance guides, continues to be estimated to be \$285,000, are borne by ETA.

A.15 Changes in Burden

The change in burden is due to an increase in grantees and the addition of a second grant program approved by OMB 11/30/2007 (see OMB reference number 200708-1205-0006).

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.

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.