

## **Supporting Statement for Paperwork Reduction Act Submissions**

### **A. Justification**

1. The Rehabilitation Services Administration (RSA) within the Office of Special Education and Rehabilitative Services of the U.S. Department of Education requests clearance to revise the existing reporting form for Projects With Industry (PWI) program. The program is authorized under Section 611 of the Rehabilitation Act of 1973 (the Act), as amended (Public Law 93-112) as well as regulations in 34 CFR part 79.

The current PWI collection package collects data that is used to: (1) evaluate the performance of grant recipients with respect to their compliance with evaluation standards as required under section 611(f)(3)(B) of the Act; (2) determine whether a grantee's performance meets the requirements for continuation funding as required by section 611(a)(f)(4); (3) comply with mandated annual reporting requirements in section 611(a)(5); and (4) evaluate the performance of the program and its grantees with respect to measures established pursuant to the Government Performance Results Act and the job training common measures.

In addition, RSA is proposing to revise the current data collection package in order to: (1) implement recommendations resulting from the FY 2004 Program Assessment Rating Tool (PART) to collect information that is consistent with the common measures for federal job training programs; (2) collect demographic and other descriptive data that will provide a clearer picture of the individuals served by PWI projects; and (3) consolidate the current PWI reporting form with the Department's required annual performance report currently submitted by grantees in a separate form as required under 34 CFR Part 75.253(a).

### **Common measures for Federal Job Training Programs**

One of the recommendation resulting from the 2004 PART review of the PWI program was to revise the program's measures to be comparable to other job training programs and develop a strategy for collecting data to support the Administration's Job Training common measures. The common measures for adult job training programs are:

- **Entered Employment:** percent of participants who were unemployed at program entry that are employed in the first quarter after the exit quarter.
- **Employment Retention:** percent of participants who were employed in the first quarter after exit that are employed in both the second and third quarters after the exit quarter.
- **Average Earnings:** Average earnings of participants in the second plus the third quarters after the exit quarter
- **Average Increase in Earnings:**

Pre to Post Program: Of those who were employed in the 1<sup>st</sup> quarter after exit, the average increase in total earnings from the 2<sup>nd</sup> quarter and 3<sup>rd</sup> quarters prior to the participation quarter to the 2<sup>nd</sup> quarter and 3<sup>rd</sup> quarters after the exit quarter

Post Program: Of those who were employed in the 1<sup>st</sup> quarter after exit, the average increase in total earnings from the 1<sup>st</sup> quarter after exit to the 3<sup>rd</sup> quarter

A 2005 Department funded study found significant barriers to implementing the job training common measures in the PWI program, including grantees' capacity for data collection and reporting; ability to access and use Unemployment Insurance Wage (UI) Records. The PWI program currently collects annual data on program participants that are similar to the data collected by the DOL under the job training common measures.

#### Entered Employment

PWI grantees have historically reported data on the number of individuals served and the number who have been placed into competitive employment. In 2005, The PWI data collection package was revised to also collect data on the number of participants that exit the program, including both individuals who are placed in employment and individuals who have not been placed in employment and have not received services from the project for 90 consecutive days). The current data collection collects data on the number of individuals who were unemployed for 6 months or more at the time of project entry. The Department has revised the proposed data collection package to also include data on the number of individuals who were unemployed at program entry consistent with the job training common measures.

#### Employment Retention and Average Earnings

PWI grantees currently report data on the number of individuals who are “placed” in employment and on the number of individuals who continue to be employed 3 and 9 months after placement. Since program regulations require a PWI participant to maintain employment for a minimum of 90 days (3 months) to be considered a “placement,” the data provides job retention information at 3, 6, and 12 months after obtaining employment; the equivalent of first, second, and fourth quarter data. In addition, PWI grantees report data on average weekly earnings at these three points in time.

The Department has revised the proposed data collection package to include job retention data at 6 months after placement (9 months after obtaining employment) that would be equivalent to the second quarter post-exit time period under the common measures. The Department believes that these changes to the current PWI data collection will fulfill the overall goal of the common measures to provide comparable evaluation data in assessing program performance, particularly the long-term impact of services on the retention of program participants' jobs and earnings. The Department believes this approach provides a less burdensome and more feasible and cost-effective method of reporting comparable job training performance data for these smaller grantees.

#### **Demographic And Other Descriptive Data**

The current data collection instrument does not collect any demographic data on individuals served by the projects. In order to provide a clearer picture of the individuals

served by the PWI program, basic demographic and other descriptive information have been added to the proposed data collection. For example, the instrument will include information on the age, race, gender, education, disability, Social Security and VR status of program participants.

### **Data Collection Consolidation**

The revised data collection would also consolidate the Department's required annual performance report with the current PWI reporting form resulting in one annual reporting submission that includes all the elements collected under the existing instrument, as well as the proposed elements identified above. Currently, PWI grantees are required to submit these reports separately with the annual performance report instrument requiring approximately 70 burden hours to complete while the PWI reporting form requires 35 burden hours to complete. The current total burden hours for PWI grantee reporting are approximately 105 hours for both reports. With the proposed consolidation of these two reports, RSA is estimating that the total grantee reporting burden hours would be reduced to 90-- an overall reduction of approximately 15 burden hours. Along with the reduction in grantee burden hours, the consolidation would result in providing time for program staff to conduct a more thorough analysis of individual grantee performance, particularly as it relates to proposed project goals identified in the original application.

2. The information collected will be used to collect data on grantees' program activities to respond to the annual report to Congress required by the Act and the Education Department General Administrative Regulations (EDGAR), program regulations as well as to facilitate program planning efforts required under the Government Performance and Results Act (GPRA) of 1993 (Public Law 103-62) and under the PART. The information collected will be aggregated in order to provide information to OMB, policy makers and the public in addressing whether this program is effective in meeting its purpose.
3. The collection of this information involves the continued use of the Rehabilitation Services Administration's (RSA) web-based Management Information System (MIS) for collecting information on grantees progress on an annual basis. Currently, all of the PWI grantees submit the PWI reporting form via the MIS. The use of this electronic means of collection is easier, faster and user-friendly for the grantees. The use of RSA's electronic system should not add to the grantee burden to respond to the additional information needed.
4. RSA has reviewed existing program reporting requirements to identify duplicate data collection requirements. RSA does not receive these data through other sources. We have attempted to avoid duplication by using the already existing form the Department uses for collecting project performance progress and modifying it to collect the additional data needed to meet the requirements of the PART assessment.
5. The regulations do not have a significant economic impact on small businesses or entities. These entities are required to collect and submit the same information as other grantees in accordance with section 611 of the Act. However, small businesses are not

adversely impacted by these requirements nor will they create a negative economic impact on their activities.

6. If the collection of this additional information is not conducted, RSA would not be able to meet its mandate by OMB under the PART assessment to collect job retention and earnings information that is consistent with the common measures for federal job training programs. In addition, legislative mandate requires that data be collected on an annual basis. To collect data less frequently would fail to fulfill the requirements of the legislation.
7. No special circumstances would cause this information collection to be conducted in a manner outside of the guidelines set forth in 5 CFR 1320.5
8. This is the first submission of this revised information collection package. We will publish 60-day and 30-day Federal Register Notices to allow public comment.
9. No payments or gifts will be provided to respondents.
10. The MIS is designed so that only the Project Director of record and/or an individual approved by the Project Director can enter the actual report for their Federal award number with their own usernames and passwords. No other grantee can obtain access to any other grantees' reporting form via the Internet. Additionally, only RSA-identified staff has access to the system's database to view and print reports.
11. No questions of a sensitive nature will be asked.
12. The burden of the collection of information includes a total of 72 Projects With Industry grantees. All grantees will be required to complete an annual reporting form for fiscal year 2007. RSA estimates that the grantees will average 90 hours to complete the reporting form which includes time to review the instructions, gather existing data, complete the form and review it for accuracy. Based on estimates for grantees to report on the PWI reporting form, RSA estimates the cost to be \$20 per hour for a total cost to respondents of about \$1,800.
13. RSA does not foresee any annual cost burden (other than the hour burden shown in item 12 above) to respondents resulting from the collection of this information.
14. There are no additional costs to the Federal government for this collection.
15. The proposed changes to the currently approved data collection package were recommended in order to; 1) respond to OMB PART recommendations to collect job retention and earnings information that is consistent with the common measures for federal job training programs; 2) include demographic and other descriptive data on the individuals served by the program; and 3) consolidate the two existing reporting requirements thereby reducing the number of reports submitted by PWI grantees from two to one annually.

16. RSA will use the information collected to report annually to Congress and OMB and for program monitoring purposes. RSA will generate standard reports with aggregate data to meet the requirements of the Act, EDGAR, GPRA and PART.

17. RSA is not seeking approval to not display the expiration date for OMB approval of the information collection. That display is appropriate for the information collection.

18. There are no exceptions to the certification statement.

**B. Collections of Information Employing Statistical Methods**

No statistical methods will be used for this data collection. All Projects With Industry grantees will be required to complete this information collection and all data will be aggregated. No statistical method would reduce burden or improve the accuracy of the results.