

Justification for Non-substantive Change

OMB Control No. 1205-0398

Planning Guidance and Instructions for Submission of the Strategic State Plan and Plan Modifications for Title I of the Workforce Investment Act of 1998 (WIA) and the Wagner-Peyser Act

The Employment and Training Administration (ETA) seeks OMB approval for a non-substantive change to its information collection “Planning Guidance and Instructions for Submission of the Strategic State Plan and Plan Modifications for Title I of the Workforce Investment Act of 1998 (WIA) and the Wagner-Peyser Act” (OMB Control Number 1205-0398). The change, described in Attachment A of the draft TEGL uploaded in the IC section of this request, instructs states on how to include their implementation of the American Reinvestment and Recovery Act of 2009 (ARRA) in their Plan modification.

Prior to the enactment of ARRA, ETA required in Training and Employment Guidance Letter (TEGL) 07-08 that all states submit either 1) a modification to their State Plan to describe the strategies and activities planned for the final year, Program Year 2009 (PY), of their five-year planning cycle PY 2005 – 2010, or 2) an extension of their existing State Plan for PY 2009. With the enactment of ARRA, states are receiving a significant infusion of funds with which to deliver workforce services under WIA and the Wagner-Peyser Act. ETA is therefore reminding states that they are required to submit a State Plan modification whenever there are major changes in state economic conditions or in state service delivery strategies, such as those caused by the allocation of ARRA funds. The TEGL provides guidance to the states to assist in their response to 24 questions in the Standalone State Plan Guidance. (Three states submit Unified State Plans; the questions in the Standalone Plan Guidance also appear in the Unified Plan Guidance, but are numbered and arranged differently.) The TEGL’s Attachment A asks states to update their responses to these 24 questions when submitting their State Plan modification.

For each of these questions, the TEGL provides examples of the information needed for the modification and asks states to describe adjustments to service strategies related to ARRA implementation. For example, question II in the State Plan Guidance asks states to describe the Governor’s key workforce system priorities; the TEGL asks states to include changes to the Governor’s priorities necessitated by the economic downturn as well as priorities for the use of Recovery Act funds.

ETA anticipates no change to the annual reporting and recordkeeping hour burden of 2,950 hours, which was based on ETA’s conservative estimate that all 59 reporting entities would submit a modification once a year. ETA has been encouraging states to update their State Plans regularly to reflect the most current state strategies. ETA assumes that any changes the states would have made in their annual updates will be encompassed in this modification which includes ARRA implementation.