

**Supporting Statement for Emergency ICR Approval: U.S. Department of Labor  
INAP AND SCSEP Grant Planning Guidance  
Training and Employment Guidance Letters (TEGLs)**

**A. Justification.**

**A-1. Reasons for Data Collection.**

The Employment and Training Administration (ETA) of the Department of Labor (DOL or the Department) occasionally solicits applications for grants through issuing a “Solicitation for Grant Applications” or “SGA.” These are usually awarded for multi-year periods. In the non-competition years, grantees are required to submit a similar but simplified set of documents to ETA in order to ensure the continuation of their grants. Grantees are generally required to submit a two-part application. The first part of an ETA Planning Guidance TEGL consists of submitting the Standard Form 424 (SF-424), “Application for Federal Assistance”, the SF-424A Budget Narrative. The second part of the Planning Guidance usually requires a statement of work re-affirming the applicant’s capabilities to meet performance criteria, along with certain certifications and assurances.

In February of 2009, ETA’s Senior Community Service and Employment Program (SCSEP) and the Indian and Native American Programs (INAP), received additional funds authorized by Title VIII of Section A of the American Recovery and Reinvestment Act (ARRA). ETA is seeking emergency approval for TEGLs to be issued by these programs in order to obligate the Recovery Act Funds by March 19, 2009, as directed by the Congress and the President.

The Indian and Native American Program provides a employment and training grants to Indian tribes, non-profit tribal organizations, Alaska Native entities and Native Hawaiian organizations for the purpose of providing employment and training services to low income and unemployed Native Americans. The program is authorized under section 166 of the Workforce Investment Act (WIA). The programs services include a Comprehensive Services (“adult”) Program (CSP), which serves Indians or Native Americans (as determined by the individual grantee) who are ages 14 and above and who are unemployed, underemployed, or low-income individuals. The INA program also administers the Supplemental Youth Services Program (SYSP), which serves Indian and Native American youth between the ages of 14 and 21 who reside on or near a reservation (or in Alaska, Hawaii, or Oklahoma), and who are low-income or have other barriers to employment.

Originally authorized by the Older Americans Act of 1965, the Senior Community Service Employment Program (SCSEP) is designed to foster individual economic self-sufficiency and promote useful opportunities in community service employment for unemployed low-income persons (particularly persons who have poor employment prospects) who are age 55 or older, and to increase the number of persons who may enjoy the benefits of unsubsidized employment in both the public and private sectors.

Under OMB Circular A-102, section c, heads of Executive departments are instructed to obtain

Office of Management and Budget (OMB) approval under the Paperwork Reduction Act (codified at 44 U.S.C. § 3501, et seq., with regulations at 5 C.F.R. Part 1320) before collecting information associated with grants that is “different or additional” to the information collected on approved standard forms (i.e., SF-424, etc.). Further, OMB Circular A-110, Subpart B instructs Federal agencies to comply with the requirements of 5 C.F.R. Part 1320, “Controlling Paperwork Burdens on the Public,” with regard to all forms used by the Federal awarding agency in place of or as a supplement to the SF-424 series.

The Department is seeking emergency approval for two Planning Guidance TEGs for information collection requirements that extend beyond what is collected on currently approved standard forms. OMB approval of these TEGs will assist the Department to carry out its responsibilities under the Paperwork Reduction Act by accurately accounting for the public burden associated with INAP and SCSEP Planning Guidance TEGs.

**A-2. Users, Purposes, and Consequences of Failure to Collect the Information.**

The submissions will only be used by Employment and Training Administration (ETA) staff who will review the submissions. The submissions will be used to make determinations about whether grantees qualify for the ARRA funds. The intent of the American Recovery and Reinvestment Act would be significantly hindered if it were not able to collect the information required to evaluate proper grant management.

**A-3. Technology and Obstacles Affecting Reporting Burden.**

There are no obstacles. Grantees may use email, fax, couriers, U.S. Postal Service or a number of express delivery services to provide the correspondence.

**A-4. Duplication.**

These TEGs do not duplicate any other collection.

**A-5. Small Business.**

This collection does not impact small businesses.

**A- 6. Consequences of Less Frequent Data Collection.**

This is a on- time collection.

**A-7. Special Circumstances Involved in Collection of Data.**

There are no special circumstances.

**A-8. Pre-Clearance Notices and Responses.**

Title VIII of Division A of the American Recovery and Reinvestment Act of 2009 (ARRA, PL 111-05) awarded ETA's Indian and Native American Program (INAP) and Senior Community Service and Employment Program (SCSEP) additional funds to be distributed to existing grantees. ETA is seeking emergency approval for TEGs to be issued by these programs in order to obligate the Recovery Act Funds by March 19, 2009, as directed by the Congress and the President.

Per 5 CFR 1320.13, were DOL to comply with the normal clearance procedures, the ARRA-mandated payment schedule would be missed because procedures for these payments must be in place immediately. The statute provides that grantees need the means to access the funds as soon as possible. Otherwise, harm to the nation's economic recovery could ensue. Finally, in preparing the guidelines, the agency has taken all necessary steps to consult with INAP and SCSEP grantees to minimize the burden of collecting the information while adhering to the ARRA payment and monitoring provisions. The public and interested parties will be provided an opportunity to comment as part of an emergency clearance notice.

**A-9. Payments to Respondents.**

There are no payments to respondents.

**A-10. Confidentiality.**

The Department makes no assurance of confidentiality to those responding to Planning Guidance TEGs.

**A-11. Questions of a Sensitive Nature.**

Application and reporting requirements in Planning Guidance TEGs do not ask questions of a sensitive nature.

**A-12. Respondents' Burden and Cost of Collecting Information.**

Based on consultation with program staff members who work with grantees, the Department assumes it takes an average of 16 working hours to prepare and submit an application in response to a Planning Guidance TEG. For purposes of this information collection request, ETA assumes that a professional earning \$28.40 per hour<sup>1</sup> will prepare an application. Therefore, the burden for these reporting activities is as follows using average response times:

145 INA planning applications x 16 hours = 2,320 **total hours**  
2,320 hours x \$28.40/hr = **\$37,715 total cost**

Of the 145 INA respondents, 16 are non-profits; the rest are tribal entities.

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<sup>1</sup>Mean hourly wage of a "Social and Community Service Manager" as reported by the 2007 Occupational Employment Statistics (OES) Survey of the U.S. Bureau of Labor Statistics

74 SCSEP planning applications x 16 hours = **1,184 total hours**  
1,184 hours x \$28.40/hr = **\$33,626 total cost**

Of the 74 SCSEP grantees, 18 are non-profits; the rest are states and territories.

**Combined TOTAL:** 219 respondents x 16 hours = 3,504 hours  
3,504 hours x \$28.40/hr = **\$99,514 total cost**

**A-13. Annual Cost to Respondents.**

Mailing is the only potential cost to respondents. Based on program staff experience, the average cost of mailing an application ranges from \$6 to \$12 dollars. Assuming a worst-case scenario and all respondents must mail applications, the burden cost is calculated as follows using an average mailing cost of \$9.00 dollars:

219 applications x \$9 mailing cost = **\$1,971.**

**A-14. Annualized Federal Cost.**

Based on consultation with grant reviewers, the Department estimates that it takes a Washington, DC, area Federal employee (GS-12, Step 5) earning \$39.70<sup>2</sup> per hour approximately four hours to review the average grant application. Therefore, the Department estimates the cost to the Federal government as follows:

(219 grant applications) x (4 hours each) x \$39.70/hr = **\$35,040**

**A-15. Reasons for Change in Burden.**

The added burden of 3,504 hours is due to the fact that this is a new collection.

**A-16. Publication Information.**

Correspondence from states will not be published.

**A-17. Display of OMB Expiration Date.**

ETA will notify grantees by a separate notice informing them of OMB's action on this information collection request including the OMB number, expiration date, and any changes that may have resulted from OMB's review.

**A-18. Exceptions to the Certification Statement.**

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2OPM Washington DC Locality Pay Schedule, 2009

There are no exceptions to the certification statement.

**B. Use of Statistical Methods**

This collection does not employ statistical methods.