

Supporting Statement For Emergency ICR Approval
Employment and Training Administration
ARRA State/Local Consultations on Readiness for Implementation

A. Justification.

A-1. Reasons for Data Collection.

The American Recovery and Reinvestment Act (ARRA) of 2009, PL 111-05 – Title VIII, outlines the public workforce system’s role in helping workers prepare for and find employment, and providing work experience for youth. The Act contains many provisions for ensuring a successful implementation of effective workforce interventions, including strict timelines and accountability measures.

Overriding principles are:

1. Transparency and accountability in the use of funds;
2. Timely spending of the funds and implementation of quality activities;
3. Expanded workforce system capacity and service levels; and
4. Increased training leading to increased employment opportunities.

To implement activities under the ARRA, ETA must accurately assess the readiness, or capacity, of the workforce system across key administrative and program areas in order to identify state and local Technical Assistance (TA) needs. ETA Regional Offices plan to use this suggested review questionnaire to consult with each state and a broad sample of local areas to determine their technical assistance needs. Information gathered from these consultations will result in recommendations on technical assistance that ETA should take to support state and local implementation of the ARRA. The objectives of the consultation are to:

- Determine the capacity of the state and local systems to use ARRA funds to significantly increase the number of workers and employers who receive ETA services, with a focus on increased training opportunities in areas such as the President’s Green Jobs initiative.
- Determine if state and local systems are in place that will prevent waste, fraud and abuse from occurring with the additional ARRA funds.
- Receive feedback on implementation areas that ETA could support through Technical Assistance (TA) directly to states and through regional sessions to ensure ARRA goals are met.
- Deliver a determination that the state or local system has the capacity to manage ARRA funding – “yes” or “no” – and what level of technical assistance should be provided to get to “yes” in all key implementation areas.

With the information gathered through this consultation, which regional staff would initiate upon

approval of this submission and complete by the end of April, ETA can determine the readiness for each state as well as a large sample of local areas, and to ensure that detailed ETA policy and implementation guidance is in place for the workforce system to launch ARRA activities throughout the country.

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

The information collected will be used only by Employment and Training Administration (ETA) staff in planning technical assistance. Public harm is reasonably likely to result without expedited clearance of this collection, as the nature of the workforce system activities is to bring immediate relief to the millions of Americans that are unemployed and most directly affected by the emergency nature of the current economic recession. This is the clear intent of Title VIII of the ARRA. Further, deadlines in the statute itself force states and local areas to make quick determinations about accepting ARRA funding, and ETA wants to provide maximum assistance in implementing the provisions of the Act.

A-3. Technology and Obstacles Affecting Reporting Burden.

There are no obstacles. Consultations will occur at the convenience of state or local representatives and can be done in person or by teleconference. Special technology is not required.

A-4. Duplication.

There is no duplication. This information collection is expressly for the purpose of ARRA implementation.

A-5. Small Business.

This collection does not impact small businesses.

A-6. Consequences of Less Frequent Data Collection.

This is a one time collection. Consequences of not performing the collection are described in number A-2 above.

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

There are no special circumstances.

A-8. Preclearance Notices and Responses.

Title VIII of the American Recovery and Reinvestment Act of 2009 (ARRA, PL 111-05) contains most of the provisions authorizing DOL – ETA programming.

Per 5 CFR 1320.13, were DOL to comply with the normal clearance procedures, the ARRA-mandated provisions would be impossible to meet, (30 days to allocate funds, transparency and reporting requirements, etc.) Public harm is reasonably likely to result without emergency clearance as the nature of the workforce investment activities is to bring immediate relief to the millions of Americans that are most directly affected by the emergency nature of the current economic recession – those that are unemployed. This is the clear intent of the provisions of Title VIII of the ARRA legislation. Finally, in preparing the guidelines, the agency has taken all necessary steps to consult with workforce system agents and stakeholders to minimize the burden of collecting the information.

A-9. Payments to Respondents.

There are no payments to respondents.

A-10. Confidentiality.

No confidential information is collected.

A-11. Questions of a Sensitive Nature.

The data collection includes no questions of a sensitive nature.

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

The burden on states for responding to this collection is estimated at 58.5 hours. It is our intention to consult with 53 states and jurisdictions and 25 large local areas. To be conservative, we have claimed burden for all 78 areas. This is a one time collection.

Average estimates response time per respondent: 45 minutes

Estimated responses: 53 states and 25 local jurisdictions.

Total Burden: 78 states and local areas x 45 minutes x 1-time collection = 3510 minutes/ 60 minutes = 58.5 hours

A-13. Annual Cost to Respondents.

There are no annualized costs to respondents.

A-14. Annualized Federal Cost.

Approximately 25 Federal staff in six regional offices will be conducting the consultations and compiling results for ETA. The total time per consultation is estimated to be 45 minutes, and the total time for compiling results is estimated to be 15 minutes, or 1 hour each. Using the pay scale of a GS-12 Step 5 employee earning \$39.70¹ per hour, 1 hour (total) per questionnaire

¹ OPM Washington DC Locality Pay Schedule, 2009

processing is 78 x 1 hour = 78 hours, multiplied times \$39.70, equals \$3,097 in federal costs for administering and processing this one-time questionnaire/consultation.

A-15. Reasons for Change in Burden.

Not applicable. This is a new information collection.

16. Publication Information.

Correspondence from states will not be published.

17. Display of OMB Expiration Date.

This Information Collection Request (ICR) requests a new OMB Control Number, which will be displayed on the instrument along with the expiration date.

18. Exceptions to the Certification Statement.

There are no exceptions to the certification statement.

B. Use of Statistical Methods

This collection does not employ statistical methods.