

Justification for Non-Substantive Change Request

Purpose: ETA is requesting OMB's non-substantive change approval of the forms identified in the Training and Employment Guidance Letter (TEGL) addressing National Emergency Grants (NEGs) which are to be funded with American Recovery and Reinvestment Act of 2009 (Recovery Act) resources.

NEGs are discretionary grants awarded by the Secretary of Labor (the Secretary), pursuant to section 173 of the WIA, as amended, to provide employment-related services for dislocated workers. NEGs are intended to temporarily expand service capacity at the state and local levels by providing time-limited funding assistance in response to significant dislocation events.

Background: Several types of NEG applications will be considered for Recovery Act funding. Traditional regular and dual-enrollment NEG applications will continue to be considered for Recovery Act funds. Because of the severe economic downturn, many states and local areas are experiencing wide-ranging impacts on employment, and their applications may not satisfy the current criteria for traditional regular and dual-enrollment NEGs. Therefore ETA has created two new types of Recovery Act-funded NEGs: regional economic impact NEGs and formula funds replenishment NEGs. These new types of grants are intended to provide states and local areas with additional options to address the impacts of the economic downturn in a manner appropriate to their specific economic situation and labor markets. To address the addition of these two new types of NEGs, ETA requests OMB's non-substantive change approval of the forms listed in the TEGLn and directly below.

Justification: Currently, the following OMB-approved forms are used to apply for NEGs: ETA 9103, 9104, 9105, 9106, 9107 and Project Narrative (OMB Control No. 1205-0439). ETA Form 9090 and the Workforce Investment Act Standardized Record Data (WIASRD) format (OMB Control No. 1205-0420) are used to report on the performance and outcomes of individuals served under NEGs, and ETA Form 9130 (OMB Control No. 1205-0461) is used to report on all ETA grant program expenditures.

Applications and reporting for regional economic impact and formula funds replenishment NEGs will involve only the forms outlined above. While some new applicants will likely apply for these Recovery Act-funded NEGs, ETA believes fewer applicants will apply for the more traditional NEGs. Thus at this time, ETA does not anticipate a change in burden hours. After ETA receives some baseline data from actual experience with the Recovery Act-funded grants compared with the balance of the grants, ETA will assess the burden estimate to determine if a non-substantive change request is required. Otherwise the burden estimates will be addressed when the information collection is submitted for renewal.

The regional economic impact NEG involves three approved information collections. (1) OMB Control No. 1205-0439 (ETA 9103, 9104, 9105, 9106, 9107 and a project narrative). (2) OMB Control No. 0420 (ETA 9090) and the Workforce Investment Act Standardized Record Data (WIASRD). (3) OMB Control No. 1205-0461 (Form 9130).

The formula funds replenishment NEG application will consist of OMB's Standard Form 424 Application Form, ETA 9106 and a Project Narrative (OMB Control No. 1205-0439), and the following forms for reporting: ETA Form 9090 and the Workforce Investment Act Standardized

Record Data (WIASRD) format (OMB Control No. 1205-0420); and ETA Form 9130 (OMB Control No. 1205-0461).

Current Status of the Online Application: Minor changes are needed for applicants to apply online for regional economic impact and formula funds replenishment NEG's in NEG's Electronic Application System. ETA will provide OMB with screen shots of the relevant new screens in the NEG Electronic Application System as soon as they are available.