

Justification for Non-Substantive Change: TRADE ACTIVITIES PARTICIPANT REPORT

ETA recently completed a series of conference calls with representatives from 48 states to discuss the report specifications of Trade Activities Participant Report (TAPR), approved for a 6 month emergency clearance on September 15, 2009 (OMB 1205-0392). As a result of these consultations, ETA finds it necessary to incorporate some textual corrections and clarifications to provide more consistent understanding of individual data elements and to enhance the data collection's conformity within the larger ETA reporting environment. These slight but important changes, if implemented now as non-substantive changes, will improve the immediate usefulness and responsiveness of the Report.

With one exception, these changes do not alter the manner of the data that is collected or reported. The exception concerns TAPR Element #301 *Eligible Veteran Status*. This element currently copies the data element definition in WISPR (OMB-1205-0469). The revised definition provides the definition Jobs for Veterans' Act Priority of Service Provisions (OMB-1205-0468), now required for several ETA programs, including TAA. Also, states would now have a one year delay in reporting this element to provide extra time for state implementation, as permitted by OMB in the NOA of 1205-0468.

For the reasons states above, ETA asks that the following changes be approved as "non-substantive" changes for direct publication through a Change 1 to TEGL 6-09 (highlighted in yellow).

1. (Appendix) the option to indicate information is not available in data elements. This option is realized in additional language that allows for "blank", or in a few cases, modification of code value "0" to reflect data elements that are not available or relevant for the individual reported in the record for the quarter. A sentence indicating these options was added to approximately half of the 137 data elements in this ICR, and is responsible for the bulk of the textual modification.
2. (Multiple pages) Corrections that provide proper repetition of information. These include inserting relevant code values in the "code value" column of the appendix that are specified the "data element name/definition" column, also provided in the appendix.
3. (Appendix)A data numbering designation for each data element that corresponds to the currently approved OMB 1205-0469 "WISPR" to allow more convenient integration for anticipated integration of ETA program reporting into a single data collection. Element numbers do not appear in order in some cases because several elements reported on WISPR will not be collected on TAPR. Note that the emergency clearance did not have any numbering designation.
4. (Appendix)A revised ordering of 11 elements within the data specification table to reflect conformity with the above mentioned WISPR.
5. (Handbook, p.6, (2), Appendix, p. 31, #928) Expanded flexibility for "when" to terminate records in cases where TAA applicants do not access TAA benefits and services for a period of time following a determination of eligibility. Current guidance provides for 180 days; the proposed change will allow states to opt for either 90 or 180 days before terminating the record.
6. (Handbook, p.6-7 (3), and p. 13) Removing a new requirement to treat *Date of Participation* and *Date of Exit* differently in the case of two small subpopulations reported on the TAPR, including:
 - TAA applicants that do not go on to become TAA participants, and

- TAA participants that receive benefits and services under more than one petition certification and result in more than one record for the same participant.

The new text will direct states to continue to report individuals in a manner that maintains consistency with guidance under the previously approved clearance, and in a manner that conforms with all other ETA program reporting, and provides clarification on not populating *Date of Exit* in cases where the individual records do not reflect TAA applicants that do not become participants.