

**Supporting Statement for Emergency ICR Approval: Reporting
Package for the American Recovery and Reinvestment Act (ARRA)
High Growth and Emerging Industries (HGEI) Grants**

A. Justification

This is a justification for the request by the Department of Labor, Employment and Training Administration (ETA) for emergency approval to implement a new collection of reporting and recordkeeping requirements for the American Recovery and Reinvestment Act (ARRA) High Growth and Emerging Industries (HGEI) grants awarded under Solicitations for Grant Applications (SGAs) SGA/DFA PY-08-17, SGA/DFA PY-08-18, SGA/DFA PY-08-19, SGA/DFA PY-08-20, SGA/DFA PY-08-21 and SGA/DFA PY-09-01. This reporting structure features standardized data collection from program participants and quarterly performance and narrative progress report formats. All data collection and reporting will be done by the grantees.

ETA is requesting emergency approval for this new collection of reporting materials. The performance reporting requirements in this package align with outcome categories identified in the SGAs used to award the ARRA HGEI grants, SGA/DFA PY-08-17, SGA/DFA PY-08-18, SGA/DFA PY-08-19, SGA/DFA PY-08-20, SGA/DFA PY-08-21 and SGA/DFA PY-09-01. The collection of this data will help ETA report the impact of these Recovery Act funds and will provide ETA with more comprehensive information on the status of individual grants and individuals that receive services and find employment through these grants. The data will also help ETA provide more targeted technical assistance to support improvement of grantee outcomes. ETA will provide ARRA HGEI grantees with a data collection system that will support (a) the collection of participant data for required reporting elements and (b) the submission of quarterly performance and narrative reports to ETA. ETA has already started awarding ARRA HGEI grants, and expects to award nearly all ARRA HGEI grants by February 2010, and is also requesting emergency clearance to ensure that it can provide an OMB approved reporting form quickly to ARRA HGEI grantees as their grant operations commence and to allow ETA to report performance accountability information immediately on the use of Recovery Act funds.

The accuracy, reliability, and comparability of program reports submitted by grantees using federal funds are fundamental elements of good public administration and are necessary tools for maintaining and demonstrating system integrity. The use of a standard set of data elements, definitions, and specifications at all levels of the workforce system, including the ARRA HGEI grants, helps improve the quality of performance information that is received by ETA.

A.1 Reasons for Data Collection.

The American Recovery and Reinvestment Act of 2009 (The Recovery Act) was signed into law by President Obama on February 17, 2009 – Division A Title VIII, P.L. 111-5. The Recovery Act is intended to preserve and create

jobs, promote the nation's economic recovery, and assist those most impacted by the recession. The Recovery Act provides the U.S. Department of Labor and the public workforce investment system with unprecedented levels of funding for a number of employment and training programs to help American workers acquire new skills and get back to work. The programs impacted by the Recovery Act include the Wagner-Peyser Act, including Reemployment Services Grants; National Emergency Grants; and ARRA HGEI Grants.

The quarterly narrative reports, which are completed by all of the ARRA HGEI grantees, provide a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter. The quarterly performance reports include aggregate data on demographic characteristics, types of services received, outcomes, and follow-up status. Quarterly performance reports will be completed by ARRA HGEI training grantees only. Training grantees include those grantees who were awarded grants under the following SGAs: (a) Energy Training Partnership Grants (SGA/DFA PY-08-18); (b) Pathways Out of Poverty Grants (SGA/DFA PY-08-19); (c) State Energy Sector Partnership and training Grants (SGA/DFA PY-08-20); and (d) Health Care Sector and Other High Growth and Emerging Industries Grants (SGA/DFA PY-09-01).

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

ARRA HGEI grantees will implement new recordkeeping and reporting requirements with grant funds. As ETA will be providing a data collection system to all of the ARRA HGEI grantees, their implementation costs will be minimized. Grant funds may also be used with the prior approval of the grant officer to upgrade computer hardware and internet access to enable projects to use the data collection system.

Grantees will enter data into the system on individuals who receive services from ARRA HGEI programs as well as on other activities provided through these grants. This data will be used by ETA to evaluate performance and delivery of ARRA HGEI grant-funded services and activities. ETA will use the data to track characteristics, services, and outcomes for participants served through these grants. ETA will also use the data to help it provide more targeted technical assistance to support improvement of grantee outcomes.

Within ETA, these data will be used by the Offices of Workforce Investment, Financial and Administrative Management, Policy Development and Research, Performance and Technology, and Regional Management (including the regional offices). Other DOL users include the Offices of the Assistant Secretary for ETA and Assistant Secretary for Policy.

A.3 Technology and Obstacles Affecting Reporting Burden.

In compliance with the Government Paperwork Elimination Act, ETA is streamlining the collection of participant data with new technology by supplying a data collection system, uniform data elements, and data definitions to grantees. All ARRA HGEI quarterly performance and narrative reports will be submitted to ETA using a web-based form through a secure Internet website.

A.4 Efforts to Identify Duplication.

ETA has minimized the reporting burden by establishing the number of data elements required commensurate with the level of resources expended and services received. Data items collected by program reports and individual records are needed to: (1) account for the specific services and activities being implemented by each grantee; (2) better identify overlapping and unproductive duplication of services, enabling grantees to maximize their use of ARRA resources; and (3) enable ETA to provide targeted technical assistance so that grantees can provide the best outcomes possible. Information collected is not available through any other data collection or report system.

A.5 Methods to Minimize Burden on Small Business.

This collection does not impact small businesses.

A.6 Consequences of Less Frequent Data Collection.

The consequences of less frequent data collection include challenges in tracking and evaluating the performance of individual grants as well as an inability to provide timely, comprehensive reports on the use and impact of ARRA funds. Further, ETA would not be able to identify challenges facing grantees and provide technical assistance to help them address these challenges, resulting in lower grantees outcomes such as the number of participants entering and retaining employment.

A.7 Special Circumstances Involved in Collection of Data.

This data collection effort does not involve any special circumstances.

A.8 Preclearance Notices and Responses.

An emergency review notice will be published in the Federal Register to allow the public to comment on this submission. In addition, the public will have an opportunity to comment again when this information request is resubmitted under regular procedures.

A.9 Payments to Respondents.

There are no payments to respondents other than the grant funds awarded to the organizations that received grants through the following SGAs: SGA/DFA

PY-08-17, SGA/DFA PY-08-18, SGA/DFA PY-08-19, SGA/DFA PY-08-20, SGA/DFA PY-08-21 and SGA/DFA PY-09-01.

A.10 Confidentiality

ETA is responsible for protecting the confidentiality of the participants and performance data and will maintain the data in accordance with all applicable Federal laws, with particular emphasis upon compliance with the provisions of the Privacy and Freedom of Information Acts. The Department is working diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted. All contractors that have access to individually identifying information are required to provide assurances that they will respect and protect the confidentiality of the data. ETA's Performance and Technology Office (PROTECH) has been an active participant in the development and approval of data security measures. The aggregate information collected through this request will not contain any individually identifying information.

A.11 Questions of A Sensitive Nature.

ETA considers participant responses to sensitive questions, such as the collection of Social Security Numbers and other demographic information, necessary in tracking and evaluating the employment outcomes of individual grants as well as ensuring that participants meet specific eligibility requirements identified in the ARRA HGEI SGAs. ARRA HGEI grantees will be responsible for obtaining participant consent and using participant responses in determining an individual's eligibility to receive services through a Recovery Act funded grant.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the Recovery Act reporting system has three components: (1) the participant data collection burden; (2) the quarterly narrative report burden; and (3) the quarterly performance report burden. ARRA HGEI training grantees are subject to all three components, while ARRA HGEI non-training grantees are only subject to the quarterly narrative progress report burden. This response provides a separate burden for each of the three components.

(1). Participant Data Collection Burden (ARRA HGEI Training Grantees Only)

The ARRA HGEI **participant data collection burden** considers the amount of participant and performance-related information collected and reported on participants that would not have to be collected by the grantees as part of their customary and usual burden to run the program. Thus the burden reflects the information collected solely to comply with the Federal reporting requirements. The collection burden will vary by participant based on the range and intensity of services provided by the grantee. For example, data collection may involve acquiring information from various partners regarding

employment training and placement, in addition to the collection of personal and demographic information by the grantees themselves.

Record Type	Hrs. Per Record	Estimated Annual Participant Count	Annual National Burden Hours
Participant	1.8	33,000	59,400

(2). Quarterly Narrative Report Burden (All ARRA HGEI Grantees)

The ARRA HGEI **quarterly narrative report burden** involves providing a detailed account of all activities undertaken during the quarter including in-depth information on strategic partnerships, status of leveraged resources, timelines, deliverables, and capacity-building activities (where applicable). Key issues, technical assistance needs, best practices, and lessons learned should also be included in the quarterly narrative report. It is assumed that each grantee will spend approximately two days (16 hours) per quarter preparing this report.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Burden Hours
Quarterly Narrative Report	64	262	16,768

(3). Quarterly Performance Report Burden (ARRA HGEI Training Grantees Only)

The ARRA HGEI **quarterly performance report burden** takes into account that all grantees are required to use the ETA-provided data collection system to generate quarterly performance reports. The data collection system is designed to apply edit checks to participant data and to generate facsimiles of the aggregate information on enrollee characteristics, services provided, outcomes, and follow-up status in quarterly report format. The burden includes reviewing and correcting errors identified by the data collection system in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours
Quarterly Performanc	64	170	10,880

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Summary:

TOTAL Annual Number of Responses

34,728

TOTAL Annual Time Burden (Hours)

87,048

A.13 Estimated Cost to Respondents

(1) Start-up/capital costs: There are no start-up costs, as ETA will provide grantees with a free web-based, data collection system that grantees will use to collect and maintain participant data, apply edit checks to the data, generate the quarterly performance report and submit narrative progress reports.

(2) Annual costs: There are no annual costs, as ETA will be responsible for the annual maintenance costs for the free, web-based, data collection system.

A.14 Estimates of Annualized Costs to Federal Government

The initial cost of developing the data collection system, along with the annual costs (up to five years, in alignment with the period of performance for the ARRA HGEI grants and accounting for any program close-out activities), of maintaining the system and developing training and technical assistance guides, estimated to be \$2,000,000, are borne by ETA.

A.15 Changes in Burden

As this is a new data collection, there is no change in burden for respondents.

A.16 Tabulation of Publication Plans and Time Schedules for the Project

Grantees will submit narrative progress reports and performance reports through the data collection system on a quarterly basis to ETA within 45 days of the end of each quarter. Quarterly report data will be analyzed by ETA staff and used to evaluate performance outcomes and program effectiveness.

Each year, ETA issues an annual report summarizing program performance based on the Secretary's goals. Data contained in the quarterly reports may be included in these reports. The data will also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports. All reports are available on the internet and accessible to the public.

A.17 Display of OMB Expiration Date.

The Expiration Date will be displayed.

A.18 Exceptions to the Certification Statement

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This information collection request does not contain statistical methods.