

Justification for Non-substantive Change

OMB Control No. 1205-0398

Planning Guidance and Instructions for Submission of the Strategic State Plan and Plan Modifications for Title I of the Workforce Investment Act of 1998 (WIA) and the Wagner-Peyser Act

The Employment and Training Administration (ETA) seeks OMB approval for a non-substantive change to its information collection “Planning Guidance and Instructions for Submission of the Strategic State Plan and Plan Modifications for Title I of the Workforce Investment Act of 1998 (WIA) and the Wagner-Peyser Act” (OMB Control Number 1205-0398). The change clarifies that instructions for submitting waiver requests are included in the State Plan and Plan Modification Guidance, and reduces the burden associated with State Plan Modification submissions for Program Year (PY) 2010.

In keeping with WIA regulations at 20 CFR 661.420(a), ETA has always requested that states submit their waiver requests along with their WIA State Plan Modifications, though states may also submit waivers at other points in the year. In either situation, waivers are always considered a modification to the WIA State Plan, and are described as such in ETA’s waiver approval letters to the requesting state. The information collection has included a question asking states to describe their waiver requests (Question V.J.) since the guidance was updated in 2005.

ETA’s Training and Employment Guidance Letter (TEGL) providing specific instructions on submitting State Plans for PY 2010 asks states to submit new waiver requests along with the State Plan Modification, and does not impose additional information collection for waivers, but does remind states that the waiver requests must meet the requirements in WIA regulations at 20 CFR 661.420(5)(iv).

ETA anticipates a reduction in the annual reporting and recordkeeping hour burden of 2,950 hours, which was based on ETA’s previous estimate that all 59 reporting entities would submit a modification once a year at 50 hours per submission. For PY 2010, ETA is approving for all interested states an extension of their current State Plan and waivers for an additional year. The WIA regulations require a State Plan modification when states undergo substantial changes; such states are required to submit a State Plan modification. ETA estimates that only 15 states will be required to or will elect to submit a State Plan modification (1 standalone and 14 unfied). Therefore, ETA estimates that the annual reporting and recordkeeping hour burden will be 750 hours, a reduction of 2,200 hours for PY 2010.

<i>Previously Approved Burden</i>	<i>Proposed Reduced Burden, PY 2010</i>
59 state responses, 2,950 hours	15 state responses, 750 hours