

## 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 provides guidance to states that wish to submit waivers to provide flexibility for implementing summer youth employment opportunities for summer 2010.

Training and Employment Notice 24-09 was published to encourage state workforce and human services agencies to work together to mount subsidized summer youth employment opportunities for low-income youth using funds available through Temporary Assistance for Needy Families (TANF) and WIA youth funds. Subsequently, states inquired about the ability to receive waivers for performance that would encourage local areas to co-enroll youth in TANF and WIA programs. States have also inquired about the ability to use Recovery Act funds for work experience opportunities for older youth, should Recovery Act funds be available past summer 2010. ETA wishes to clarify the criteria it will use in determining whether to approve such requests, and therefore intends to specify to all states what should be included in such waiver requests. ETA is including this guidance in a Training and Employment Guidance Letter (TEGL) that clarifies ETA’s Program Year 2009 waiver decisions. In this TEGL the instructions pertaining information to include for summer 2010 TANF/WIA waivers are yellow highlighted. See Section 8B, specifically the first full paragraph on p11, and 8.C., first set of bullets on p12.

ETA does not anticipate a change in the annual reporting and recordkeeping hour burden as a result of this clarification. The burden estimate already anticipates a certain number of hours each state spends per year preparing waiver requests as part of their State Plan modification.