

Justification for Non Substantive Change for 1205-0371

ETA internal reviewers recommended that the TEGL submitted with the revised Youth Self-Attestation Form (SAF) and cleared by OMB with its Notice of Action issued April 9, 2010 be presented differently. The reviewers believe that a “standalone” Change 3 TEGL will be more easily understood than a Change 3 clarification embedded in the text of the previously issued Change 2 TEGL.

Therefore, WOTC program management created a standalone Change 3 TEGL where the TEGL content is: a) the clarification note previously imbedded in the Change 2, and b) referring states to attached updated SAF. Additionally, the previously issued Change 2 will be included as an attachment to ensure that the new issuance, along with the revised SAF, comprise one “packet” for states to review.

Please note: there are no substantive changes to the text in this “standalone” Change 3 TEGL, which is essentially comprised of the previously approved “clarification” note. To help with the review, we have highlighted in yellow the sections in the attached Change 3 TEGL that were taken directly from the Change 3TEGL previously cleared by OMB. The primary non substantive change is the order of sentences, changed to make more sense in a standalone document.