

Supporting Statement for OMB Control No. 1205-0478: American Recovery and Reinvestment Act (ARRA) High Growth and Emerging Industries (HGEI) Grants

A. Justification

This supports the Department of Labor, Employment and Training Administration (ETA)'s request to extend OMB approval for 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, SGA/DFA PY-09-01, SGA/DFA PY 09-09, and the ARRA of 2009 Health Care Pilot. This reporting structure features standardized data collection from program participants and quarterly performance and narrative progress report formats. All data collection and reporting is done by the grantees.

These performance reporting requirements align with outcome categories identified in the SGAs used to award the ARRA HGEI grants, as noted above. The collection of this data helps ETA report the impact of these Recovery Act funds and provides ETA with more comprehensive information on the status of individual grants and individuals that receive services and find employment through these grants. 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. This data also helps ETA provide more targeted technical assistance to support improvement of grantee outcomes. ETA will provide ARRA HGEI grantees with a data collection system, the Recovery Act Data (RAD) system, which will support (a) the collection of participant data for required reporting elements and (b) the submission of quarterly performance (ETA-9153 Form) and narrative reports to ETA. This data also allows ETA to report performance accountability information on the use of Recovery Act funds.

A.1 Reasons for Data Collection.

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 provide a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter.

Quarterly narrative reports are completed by all ARRA HGEI grantees. ARRA HGEI grantees consist of those grantees awarded grants under the following SGAs: (a) State Labor Market Information Improvement Grants (SGA/DFA PY-08-17); (b) Energy Training Partnership Grants (SGA/DFA PY-08-18); (c) Pathways Out of Poverty Grants (SGA/DFA PY-08-19); (d) State Energy Sector Partnership and Training Grants (SGA/DFA PY-08-20); (e) Green Capacity Building Grants (SGA/DFA PY-08-21); (f) Health Care Sector and Other High Growth and Emerging Industries Grants (SGA/DFA PY-09-01); and, (g) Category 1-Health Care Virtual Platform and Category 2-Enhancing the Ability of Community- and Faith-Based Organizations to Deliver Virtual Career Exploration Services, Including Health Care Careers (SGA/DFA PY 09-09), and grants awarded through the ARRA of 2009 Health Care Pilot. The quarterly performance reports (ETA-9153) include aggregate data on demographic characteristics, types of services received, outcomes, and retention and follow-up status. Quarterly performance reports are completed by ARRA HGEI training grantees only. Training grantees consist of those grantees 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.

Grantees will enter data 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. The ARRA HGEI Performance Reporting Handbook has information on the required data elements to be collected by grantees, and refers to a separate document that contains a list of these required data elements. Grantees are required to collect additional participant data beyond those elements required by the Recovery Act.

ETA uses the data to track characteristics, services, and outcomes for participants served through these grants. ETA also uses the data to target technical assistance to support improvement of grantee outcomes.

Within ETA, the data is 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, (GPEA) 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 (ETA-9153) and narrative reports will be submitted to ETA using the data collection system, the RAD system. The RAD system was released in July 2010 and is accessible to all ARRA HGEI grantees.

A.4 Efforts to Identify Duplication.

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 achieve 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 Recovery Act 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.

A notice inviting comments from the public was published in the *Federal Register* on May 17, 2010 (Vol. 75, p. 27583). No comments were received.

A.9 Payments to Respondents.

There are no payments to respondents other than the grant funds awarded to the organizations that receive 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, SGA/DFA PY-09-01, SGA/DFA PY 09-09, and grants awarded through the ARRA of 2009 Health Care Pilot.

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 Office of Policy Development and Research 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.

While sensitive questions will be asked of participants in the proposed data collection, the confidentiality of participants will be protected as discussed in section A.10. In addition, the RAD system includes security measures. Participant responses to sensitive questions will allow ETA to comprehensively evaluate the effectiveness of the Recovery Act programs.

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 performance report (ETA-9153 Form) burden; and (3) the quarterly narrative 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 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	Hours Per	Estimated Annual	Annual National
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	Record	National Count	Burden Hours
Participant	1.8	77,160	138,888

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

The ARRA HGEI **quarterly performance report burden** takes into account that ARRA HGEI Training grantees are required to use the RAD system to generate quarterly performance reports (ETA-9153). The RAD 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 retention and follow-up status in quarterly report format. The burden includes reviewing and correcting errors identified by the RAD system in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports (ETA-9153). Based on past experience, ETA assumes that each grantee spends approximately two days (16 hours) per quarter preparing this report.

Report	Hours per Response	Hours Per Year Per Respondent	Number of Respondents	Annual National Hours
Quarterly Performance Report	16	64	152	9,728

(3). 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	Hours per Response	Hours Per Year Per Respondent	Number of Respondents	Annual National Burden Hours
Quarterly Narrative Report	16	64	251	16,064

A.13 Estimated Cost to Respondents

(1) Start-up/capital costs: There are no start-up costs, as ETA will provide grantees with the RAD system, 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 reports.

(2) Annual costs: There are no annual costs, as ETA will be responsible for the annual maintenance costs for the RAD system.

A.14 Estimates of Annualized Costs to Federal Government

ETA funds the initial cost of developing the RAD system, along with the annual costs (in alignment with the period of performance for the ARRA HGEI grants and accounting for any program close-out activities) of maintaining the RAD system and developing training and technical assistance guides, estimated to be \$2,000,000.

A.15 Changes in Burden

All of the ARRA HGEI grants have now been awarded under the ARRA HGEI SGAs and through the ARRA of 2009 Health Care Pilot. Thus the actual total number of grants is 251 rather than 262, the original estimate. However, although the total number of grantees is slightly less than the previous estimate, the estimated annual participant count has increased from 33,000 to 77,160, raising the net total annual responses to 78,772 and the total annual burden hours to 164,680.

Note: Minor non-substantive changes have been made to the quarterly performance report (ETA-9153) and accordingly to the Progress reporting Handbook, and Reporting Glossary and Guide:

shading specific areas of ETA- 9153 to enhance legibility; changing the format of the “Ethnicity/Race” section to make it clear that “Ethnicity” and “Race” are two separate categories and that the “Hispanic/Latino” category refers to ethnicity, not race;

changing the format of the “Education Level” section to make it clear that grantees should report “Education Level” categories by type of credential attainment;

changing section C.1c to clarify that grantees should report specifically on apprenticeship activities that are registered;

changing the Reporting and Glossary Guide to help grantees understand the difference between sections C.1d and C.2;

minor formatting edits to sections C.1a and D.1c to clarify that certain industry categories are subsets of other categories; and

changing section D to clarify that degrees and certificates are examples of credentials, as well as providing definitions for degree and credential types in the Reporting Glossary and Guide.

These non-substantive changes were made to improve the clarity and effectiveness of these reporting materials and do not impact the burden for respondents.

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

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

Each year, ETA issues a 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 Government Performance and Results Act (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 is 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.