

**THE SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM
(SCSEP): OMB 1205-0040
Supporting Statements, Part A**

Supporting Statement A

JUSTIFICATION

Introduction: This information collection extension request contains program performance reports for the Senior Community Service Employment Program (SCSEP). The previously approved package permitted implementation of the Older Americans Act (OAA) Amendments of 2006. That request reflected information collection requirements contained in the Interim Final Rule published June 29, 2007. The current request is for approval of modified forms necessitated by the reauthorization of the SCSEP legislation (2006 Amendments to the Older Americans Act, Public Law 109-365), SCSEP Final Rule (20 CFR Part 641) and the Jobs for Veterans Act of 2002 (Public Law 07-288); an overall burden increase brought about by additional funding for additional participants; changes in overall burden for some forms based on actual usage statistics; and the requirement to publish changes to Internet-based SCSEP Performance and Results QPR (SPARQ) system that went into effect on July 1, 2010.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and or regulation mandating or authorizing the collection of information.

<i>FORM</i>	<i>LEGISLATIVE CITATIONS OAA-2006</i>	<i>REGULATORY CITATIONS</i>
Participant, Community Service Assignment, Exit, Unsubsidized Employment	Sections 502(a)(1), 502(b)(1)(C), 502(e), 503(f), (g)	641.879(a) 641.700
Quarterly Financial Report (ETA-9130)	503(f)(3)	641.879(b)
SCSEP Equitable Distribution Report	Sections 507(a), (b), Section 508	641.325(a), 641.360, 641.879(c)
Application for Federal Assistance & Budget Information Sheet (SF-424)	Section 502(b)(1), Section 503 (f)(2)	641.410(a), (b)
Customer Satisfaction Surveys	Sections 513, 514, 502(e), 503(f), (g)	641.710

The SCSEP is funded for approximately \$759 million for PY 2010 and will provide over 78,000 positions in which nearly 120,000 low-income persons aged 55 or older will be placed in community service employment. At Program Year (PY) 2008 placement rates, this should allow as many as 20,000 people to be exited from the program with the ultimate goal of unsubsidized placement in PY 2010.

To ensure that the Senior Community Service Employment Program is properly administered, and to implement the performance measures and sanctions authorized by the 2006 Amendments to the OAA (OAA-2006) and the Jobs for Veterans Act of 2002, it has become necessary to further modify the existing data collection forms. In addition, an analysis of recent usage necessitates a minor revision of data collection forms and adjustment of the overall data collection burden. The

legal authority for the collection of additional information may be found at sections 503, 508, 513, and 515 of the OAA-2006.

2. Indicate how, and by whom, and for what purpose the information is to be used. Except for a new collection indicate the actual use the agency has made of the information received from the current collection.

- The Department has used the Quarterly Progress Report (ETA 5140) for 30 years to record information about SCSEP program participants and to measure grantees' progress toward agency goals and objectives. The Department uses the information to manage the program and to report program results to the public and the Congress. OAA-2006 created revised reporting requirements. These requirements continue the collection of information that can be used to measure performance against program goals and to implement corrective actions should performance prove inadequate. Corrective actions for state grantees under the OAA-2006 may include a reallocation of the grantee's funding to another entity. National grantees may be barred from participation in the next SCSEP competition if they fail to meet their aggregate goals for three successive years. There is no longer a burden associated with the ETA-5140 because grantees are no longer required to submit the QPR. SPARQ generates the ETA-5140 from participant records maintained and submitted by the grantees. Thus, the burden associated with the data entry forms is all that is required for QPR generation.
- Section 503 of OAA-2006 provides for a single State Plan that outlines a 4-year strategy for the statewide provision of community service employment and other authorized activities for eligible individuals, which requires the Governor to solicit public involvement in the development of the Plan. ETA Form 8705 (see below) is used to determine the location of the SCSEP-eligible population and compares it with the actual location of program positions. The differences between the proportional share and the actual share form the basis for much of the State Plan activity. Among the agencies involved in preparing the State Plan are Workforce Investment Act (WIA) agencies, Area Agencies on Aging, community service agencies, and the SCSEP national grantees operating in that state. The purpose of the State Plan is to ensure that States address the employment situations and skills of the eligible population.
- The Equitable Distribution Report (ETA 8705) has been used by the program for over 20 years. It remains a requirement under section 508 of OAA-2006, which calls for state grantees, in conjunction with national grantees operating in the state, to submit a report that details an equitable allocation of SCSEP resources within the state based on county-by-county data showing the number of SCSEP-eligible persons in the population from the most recent U.S. Census. The Equitable Distribution Report remains unchanged from previously submitted versions.
- The 2006 amendments to Title V of the Older Americans Act (OAA-2006, Pub. L.109-365) require that customer satisfaction surveys be conducted for all three customer groups: participants, host agencies, and employers. The Employment and Training Administration (ETA) is using the American Customer Satisfaction Index (ACSI) to meet the customer satisfaction measurement needs of several ETA programs including the Senior Community Service Employment Program (SCSEP). SCSEP has been conducting these surveys nationwide since 2004. The survey approach allows the program flexibility and, at the same time, captures common customer satisfaction information that can be aggregated and compared among national and state grantee. The measure is created with a small set of core questions that form a customer satisfaction index. The index is created by combining scores from three specific questions that address different dimensions of customers' experience. Additional questions that do not affect the assessment of grantee performance are included to allow grantees to effectively manage the program. (See Part

B of the Supporting Statement for a discussion of customer satisfaction survey methodology.)

3. Describe the collection of information involving the use of automated, electronic, mechanical, or other technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

- The Department requires grantees to submit data electronically in order to reduce costs and improve the quality. To accommodate the collection of information on the revised performance measures and the common measures, the Department in 2003 provided grantees with a software program – the Data Collection System (DCS) – that allowed them to collect participant data through their existing systems. In some cases this was the first electronic database used by grantees. One immediate effect of the implementation of the DCS was the elimination of the need for grantees to produce Quarterly Progress Reports. These are now automatically generated by the DCS software. The final step in the evolution of SCSEP performance reporting is the Internet-based SCSEP Performance and Results QPR (SPARQ) system, which was launched during Program Year 2004. ETA is confident that, as the system is refined, the overall reporting burden for grantees will continue to be reduced.
- The ETA 8705 (Equitable Distribution Report) is submitted electronically by the states as an Excel-compatible spreadsheet.
- In conjunction with the Department's e-grants initiative, ETA is developing systems that will allow an increasing number of grant applicants to apply on-line for grants and grant renewals.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use the purposes described in Item 2 above.

The SCSEP is a discrete program authorized by title V of OAA to promote part-time community service employment and to foster individual economic self-sufficiency, thereby increasing the numbers of participants who obtain unsubsidized employment. The information collected includes participant personal characteristics, community service and employment records, statistics such as dates documenting progress through the program, and post-program follow-up information. Moreover, many of the performance measures that are required by this program are not collected by any other program and are uniquely defined.

5. If the collection of the information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize the burden.

Although small entities (generally non-profits) are active partners in the provision of community services and act as host agencies to program participants, these entities are usually not actively engaged in the reporting process. Thus, they are not likely to be aware of the revised reporting requirements. The exception is that some small private employers and host agencies may be chosen to receive customer satisfaction surveys. Response to these surveys is, however, voluntary.

6. Describe the consequence to the Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

- The OAA-2006 changed SCSEP by not only revising the performance measures but also requiring the Department to implement corrective action if grantees performance falls below specified negotiated levels. By requiring performance data, the interests of the grantees are protected, because these reports permit them to monitor their program progress. Moreover, Quarterly Progress Reports allow the Department to monitor grantee progress toward goals and provide timely assistance to the grantees if needed.
- If the collection of information under the Administration's common performance measures initiative is conducted less frequently, it would be contrary to the definitions provided for the measures and inconsistent with the actions of other Federal agencies and other programs within the Department.
- The Equitable Distribution Report is required annually by the OAA-2006. Failure to collect this information would be contrary to the legislation.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **more often than quarterly**
- **requiring a written response to an information collection in fewer than 30 days**
- **requiring more than an original and a copy**
- **requiring record retention longer than 3 years**
- **in connection with a statistical survey that is not designed to produce results which can be generalized to the universe of the study**
- **utilizing statistical data that has not been approved by OMB**
- **a pledge of confidentiality**
- **revealing a proprietary trade secret**

It is not likely that any of the situations described above will occur. This collection of information complies with 5 CFR 1320.5.

8. Consultation Efforts

Three years ago, in a *Federal Register* Notice (Volume 72, Number 26) published on February 8, 2007, ETA solicited the public's input on implementation of the performance indicators. A summary of those comments has been included in the Interim Final Regulations on performance measurement, along the Department's responses to the comments.

The preamble to the Interim Final Rule, in accordance with the Paperwork Reduction Act of 1995, allowed the public 60 days to review and comment on the package which was published in June of 2007. The preamble of the Final Rule, which was published over three years later, in the *Federal Register* on September 1, 2010, incorporates the public comments and ETA's responses.

With the publication of the *Federal Register's* Comment Request for Information Collection for the SCSEP Data Collection System, OMB Control No. 1205-0040, Extension With Revisions, on May 13, 2010, an additional opportunity for comment was provided. The ETA received comments from SCSEP grantees or groups of grantees and one from a sub-grantee.

The Department requested comments that:

- Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;
- Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- Enhance the quality, utility, and clarity of the information to be collected; and
- Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses.

To the extent that comments received addressed the above points, three commentors expressed dissatisfaction with SCSEP data validation requirements. However, data validation is covered under another information collection. Please see the Comment Request for Information Collection for The Data Validation Requirement for Employment and Training Programs (OMB Control No. 1205-0448): Extension, published in the *Federal Register* on September 27, 2010 (Volume 75, p. 59294 *et seq*).

Two commentors called the SPARQ data collection system "rigid," saying it "cannot be updated easily" and "is complicated and not intuitive to use." "It is important to question why DOL/ETA chose to design the SCSEP DCS/SPARQ data validation system to be much more stringent and demanding than any present WIA program." The Department recognizes the complexity of the system and is working to improve it so that more grantees will choose to use it. The system is complex because it is 1) an employment and training program as well as a community service program and 2) Multifaceted reporting requirements are imposed by the SCSEP's legislative mandates. The SCSEP performance measures must reflect both facets of the program. Further complicating matters, the SCSEP contains numerous eligibility requirements that WIA does not have.

The same two commentors, also criticized SPARQ for a lack of program management functions. "The Data Collection System (DCS/SPARQ) is designed to primarily monitor statutory compliance versus provide programmatic support, thus the DCS fails as a tool to support SCSEP grantees in performance measurement/management." The Department agrees with this point. SPARQ's main function has always been to measure SCSEP grantees' performance. That said, the Department has continually added features to SPARQ in response to grantees' requests for more case management assistance. This has been a slow process, limited by the amount of IT funding available each year, but also limited by added requirements such as implementing a separate reporting function for the SCSEP Recovery Act grants and tracking participants' time in program to assist grantees in managing the four-year duration limit for participants. Indeed, a large part of the program's recent IT effort has gone into producing management reports to assist grantees in tracking duration.

The same two commentors criticized SPARQ's lack of financial management features. Although financial management features are not presently considered part of SPARQ's mission, ETA is studying the opportunities for financial management support that do not present Privacy Act or security concerns about using social security numbers required for payroll.

Another commentor suggested ideas for reducing the number of pages of three of the SCSEP data collection forms and also suggested re-wording parts of the SCSEP customer satisfaction forms. ETA is working to incorporate these suggestions into its data collection

forms and customer satisfaction surveys. Once these changes are complete, ETA will submit the modifications to OMB for approval.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration to grantees.

SCSEP grantees are forbidden from providing any remuneration other than the normal wages for community service work in non-profit host agencies.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Basic confidentiality rules relating to privacy apply, and the Department works diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted. All contractors with access to individually identifying information are required to provide assurances that they will respect and protect the confidentiality of the data. ETA's PROTECH department has been an active participant in the development and approval of data security measures – especially as they apply to the Internet-based data collection system (SPARQ).

A key concern is for the protection of participant social security numbers. Grantees must collect the social security number in order to properly pay participants for their community service work in host agencies. When participant files are sent to DOL for aggregation, the transmittal is always protected by secure encryption. When participant files are retrieved within the SPARQ system, only the last four digits of the social security number are displayed. Any information that is shared or made public is aggregated by grantee and does not reveal personal information on individuals.

In addition to the above, a Privacy Act Statement (see Supplementary Documents in ROCIS) is provided to grantees for distribution to all program participants. Participants receive this information when they meet with a case worker or intake counselor. When the programs are monitored, implementation of this item is included in the review.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, and the explanation to be given to persons from whom the information is requested, and any steps taken to obtain their consent.

Questions of a sensitive nature include self-identification of a disability. Applicants are informed that EO information – gender, ethnicity, race, and disability – is voluntary and that the refusal to provide it will have no effect on any decision to provide services to them. The collection of this information is similar to other programs (such as WIA) and complies with the requirements of the Americans with Disabilities Act.

12. Provide estimates of the hour burden of the collection of information.

The increase in burden hours for the SCSEP program is an overall result of the fact that Congress has recently provided significant funding increases to the program. That means grantees are reporting data on more participants than in the past, thus increasing the total number of responses. The increase is mitigated by the fact that the response data for the

SPARQ and Customer Satisfaction Forms has been adjusted downward based on PY 2008 usage statistics.

Senior Community Service Employment Program 2010 Burden Hour Estimates

Cite Reference	Total Respondents	Frequency	Total Responses	Average Time per Response	Burden Hours
Participant Data Form – ETA-9120	74	Ongoing	120,000	12 mins.	24,000
Community Service Assignment Form – ETA-9121	74	Ongoing	143,000	6 mins.	14,300
Unsubsidized Employment Form – ETA-9122	74	Ongoing	18,000	6 mins.	1800
Exit Form – ETA-9123	74	Ongoing	60,000	6 mins.	6,000
Equitable Distribution Report Form – ETA-8705	51	Annually	51	10 hours	510
Participant Customer Satisfaction – ETA-9124A	17,500	Annually	17,500	10 mins.	2917
Host Agency Customer Satisfaction – ETA-9124B	11,900	Annually	11,900	10 mins.	1,983
Employer Customer Satisfaction – ETA-9124C	3,800	Annually	3,800	10 mins.	633*
Four-Year State Plan	28	Annually	28	7.25 hours	203*
TOTAL	////	////	374,279	////	52,346*

* Rounding may cause combined ROCIS entry and separated Justification statement to disagree.

Note 1: Each of the above forms (with the exception of the ETA-8705 and Four-Year State Plan) is disaggregated in ROCIS because each is associated with two categories of affected publics. Therefore, each of the burden hour totals for these forms in the table above has two separate sub-totals in the ROCIS submission.

Note 2: The total estimated number of respondents is calculated based on 74 state and national grantees for most reports; a combined 33,200 customer satisfaction survey respondents; and 50 states and one territory for the equitable distribution reports.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life); and (b) a total operation, maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining,

disclosing or providing the information. Include descriptions of methods used to estimate cost factors including system and technology acquisition expected useful life of the equipment. Capital and start-up cost include preparation for collecting information: such as purchasing equipment and record storage.

- If cost estimates are expected to vary widely, agencies should present ranges and explain the reasons for the variance. The cost of purchasing or contracting out the information collection services should be a part of this cost burden estimate. In developing cost burden estimates the 60-day pre OMB submission public comment process and use existing economic and regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchase of equipment or services or portions thereof unless they are for the specific purpose of the collection of the additional information.

The SPARQ application does not require any software more advanced than Windows 98. The SPARQ application does not require any specific operating system. The application is designed to run on any computer with broadband Internet access and Internet Explorer, Mozilla Firefox, Sahara, or other browsers. All grantees and sub-grantees currently have the equipment necessary to operate the application. Grantees need not incur any additional ongoing costs; although there may be some minor costs (covered by grant funds) associated with training grantee staff to use the system. The data collection application is provided free to all grantees (and sub-grantees) that wish to use it. Grantees that wish to modify their existing automated systems to report the required data rather than use the SCSEP application incur the cost of modification. Because all grantees could use the SCSEP application without any cost, the Department does not consider the cost of modifying existing automated systems to be a cost burden resulting from the SCSEP system.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses, and other expenses that would not have been incurred without this collection effort. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Costs to the Federal Government of the SPARQ System

Report	Federal Review Hours*	Average Hourly Wage	Number of Reviews	Total**
QPR Report ETA-5140, now reflected by SPARQ data entry forms ETA 9120, 9121, 9122, and 9123))	3	\$40.66	370	\$45,133
State Senior Employment Coordination Plan	5	\$40.66	54	\$10,165

Including ED Report				
Equitable Distribution Report (ETA-8705)	2	\$40.66	54	\$4,066
Grant Application 424, 424A	8	\$40.66	74	\$24,071
TOTAL:	18	////	552	\$83,434

*The estimates above are based on past experience in reviewing the reports but also include judgments on the time needed to analyze the performance results and review new requirements. They are based entirely on estimated staff time needed to review the reports. The average hourly cost for Federal staff members who review reports is based on the OPM Washington DC Locality Pay Schedule, 2010; Federal employee (GS-12, Step 5).

**In addition to the above ongoing costs, the ETA expects to incur contractor costs of \$2.9 million in 2010 for data specification, maintaining and testing the SPARQ software, and providing training and technical support to grantees using the system. These costs have been fully funded through the use of SCSEP set-aside funds.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

The overall burden has increased slightly from the previously approved 46,146 hours to the current request for 52,143 hours due to added ARRA funding, which gave opportunities for additional participants to be included in the program. The reason this uptick is not larger is that 1) the response data for the SPARQ and Customer Satisfaction Forms have been adjusted downward based on PY 2008 usage statistics, and the SPARQ forms ETA 9121 and ETA 9122 in the previously approved submission were inadvertently pegged at 11 minutes per form instead of 6 minutes per form, which is the stated estimated public burden for completing the form. The federal cost burden increased to \$83,434 due in part to federal wage updates and because of the added program participants. In addition, note that ROCIS now also reflects \$2,900,000 in annual contractor costs (not included in ROCIS in the previous submission), for a total of \$2,9083,434.

16. For the collection of information results that will be published, outline plans for the tabulation, and publication. Address any complex analytic techniques that will be used.

In general, information from the Quarterly Progress Report (ETA 5140) has not been published by the Department – although it has sometimes been published by others and shared with the grantees. The Department will publish on its Web site the performance results of each grantee. SCSEP has also been selected as one of three ETA programs to have its data made available on a government-wide Web site in response to OMB’s Open Government Directive, which has the goals of publishing government information on-line, improving the quality of government information, creating and institutionalizing a culture of open government, and creating an enabling policy framework for open government. At this time, the focus is on populating the data.gov Web site.

The State Plan is publicly presented for comment by individual states in accordance with each state’s comment process. Such processes may include publication in local newspapers or on the state’s Web site.

The QPR uses no complex calculations. Results are generally tabulated as sums, averages, or percentage rates.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be appropriate.

ETA displays the OMB control number and the expiration date on all approved forms.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submission” of OMB 83-I.

N/A