

Supporting Statement for OMB Control No. 1205-0465: High Growth and Community-Based Job Training Grants

A. Justification

This document provides the justification for the request by the Department of Labor, Employment and Training Administration (ETA) for an extension with revisions of OMB-approved quarterly progress reporting requirements for the High Growth Job Training Initiative (HGJTI) grants and the Community-Based Job Training (CBJT) grants. The OMB-approved HGJTI and CBJTG reporting requirements, OMB No. 1205-0465, expire May 31, 2011. Terms of the grants require submitting standardized quarterly progress reports summarizing the number and types of participants served by grantees, the number of exiters, the number of participants engaged in training activities, and some participant outcomes. To calculate the common performance measures for each grantee and the grant programs as a whole, grants also require quarterly standardized records for exiters that contain the minimum number of elements needed to calculate common performance measure outcomes. ETA funds the operation and administrative management of the Common Reporting Information System (CRIS), which uses unemployment insurance (UI) wage records as the primary source of data on wages and employment. Through CRIS, on behalf of the grantees, the State of Kansas accesses wage data available through the Wage Record Interchange System to obtain aggregate performance measure outcomes for each grant to support federal performance reporting requirements.

These performance reporting requirements align with outcome categories identified in the Solicitation for Grant Applications (SGAs) used to award HGJTI and CBJT grants. The collection of this data helps ETA report the impact of these 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 HGJTI and CBJT 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 provides HGJTI and CBJT grantees with a reporting system, the Enterprise Business Support System (EBSS), which supports the quarterly submission of both a narrative report and performance report (Form ETA-9134).

A.1 Reasons for Data Collection.

In 2001, the President announced a Management Agenda to improve the management and performance of the Federal government. Budget and performance integration, one of the five government-wide goals, emphasizes program effectiveness. In keeping with the President's Management Agenda,

the Office of Management and Budget (OMB) and other Federal agencies developed a set of common performance measures to be applied to certain Federally-funded employment and training programs with similar strategic goals.

These common performance measures enhance the government's ability to assess the effectiveness and the impact of the workforce investment system, including its performance in serving people who face significant barriers to employment. By minimizing the differences in reporting and performance requirements, common performance measures can facilitate the integration of service delivery and break down barriers to coordination among programs.

The common measures are a key component of the HGJTI and CBJTG performance accountability system, because they permit the core purposes of the workforce system to be described in a similar manner: How many people found jobs? Did people stay employed? Did their earnings increase? Standardizing the definitions of the outcomes across programs simplifies reporting and facilitates comparison and management of results. Reporting requirements that facilitate calculation of the common measures for the HGJTI and CBJT grants enhance the Agency's ability to manage the programs and assess the overall effectiveness of the workforce investment system.

ETA's statutory and regulatory authority to administer these programs includes provisions for the requirement of performance reporting from grantees. The legislative authority for these programs comes from the Workforce Investment Act (WIA) (29 U.S.C. 2801 et seq.) and the American Competitiveness in the Twenty-first Century Act of 2000 as amended, both of which authorize and/or require that ETA collect information from grantees regarding program performance and participant outcomes.

Information is collected from the HGJTI and CBJTG grantees under the following authorities:

WIA Section 185 broadly addresses reports, recordkeeping, and investigations across programs authorized under Title I of the Act:

- Require the Secretary to ensure that all elements of the information required for reports be defined and reported uniformly [Section 185(d)(2)]
- Direct each state, local board, and recipient (other than a sub-recipient, sub-grantee, or contractor of a recipient) to prescribe and maintain comparable management information systems designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant and financial data necessary for reporting, monitoring, and evaluating purposes [Section 185(c)(2)]
- Require that recipients of funds under Title I maintain records and reports containing information the Secretary may require regarding the performance of programs [Section 185(a)(2)]

- Require that recipients of funds under Title I maintain standardized records for all individual participants [Section 185(a)(3)]

WIA Section 189(d) requires that the Secretary prepare and submit to Congress an annual report regarding the programs and activities carried out under Title I. Included in these reports are:

- A summary of the achievements, failures, and problems of the programs and activities in meeting the objectives of Title I
- Recommendations for modifications in the programs and activities based on analysis of such findings
- Such other recommendations for legislative or administrative action as the Secretary determines to be appropriate

The American Competitiveness and Workforce Improvement Act of 1998, Title IV, Section 414 (c), as amended by the Consolidated Appropriations Act of 2005, Division J, Title IV, Subtitle B, Section 428 and WIA Section 171(a) direct the Secretary to require grantees to report on the employment outcomes obtained by workers receiving training under this subsection using indicators of performance that are consistent with other indicators used for employment and training programs administered by the Secretary, such as entry into employment, retention in employment, and increases in earnings.

The quarterly progress reports have two components: a performance report and narrative report. Both reports are submitted on a quarterly basis by all HGJTI and CBJT grantees. The quarterly performance reports (ETA-9134) include aggregate data on demographic characteristics, types of services received, outcomes, and retention and follow-up status. The quarterly narrative reports provide a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter.

A.2 Users, Purposes, and Consequences of Failure to Collect the Information.

ETA uses the information grantees report for the following purposes:

1. To provide program and performance information to stakeholders, including participants, businesses, taxpayers, Congress, and others.
2. To continuously improve the quality, effectiveness, and efficiency of the programs.
3. To provide management information for use in Federal program administration and oversight, including grant-specific participation, service, and outcome summaries.

4. To fulfill ETA's compliance with the Government Performance and Results Act (GPRA) and to complete the OMB Performance Assessment Rating Tool (PART) review.

In addition, information obtained through this reporting is used at the national level during budget and allocation hearings, for DOL compliance with legislative requirements, and during legislative reauthorization proceedings.

A.3 Technology and Obstacles Affecting Reporting Burden.

To comply with the Government Paperwork Elimination Act, ETA has streamlined the collection of participant data and the preparation of quarterly progress reports by providing uniform report formats and data definitions to grantees across ETA programs. All HGJTI and CBJT grant reports are submitted to ETA via the Internet. It is left to grantees to select the technology to collect individual case management data according to their unique circumstances and resource availability.

The use of unemployment insurance (UI) wage records as the primary source of data on wages and employment results in decreased burden hours for many grantees. To minimize their burden further, ETA funds the operation and administrative management of the Common Reporting Information System (CRIS). Through CRIS, on behalf of the grantees, the State of Kansas accesses wage data available through the Wage Record Interchange System to obtain aggregate performance measure outcomes for each grant to support federal performance reporting requirements.

DOL/ETA and the Kansas Department of Commerce have an MOU through which Kansas submits information from HGJTI and CBJT grantee information to match with wage records through the Wage Record Interchange System and the Federal Employment Exchange System in order to calculate the common measures. Through this MOU, common measures are calculated for all grantees/states.

A.4 Efforts to Identify Duplication.

The proposed report is the only report currently required for HGJTI and CBJTG grantees for quarterly progress reporting. Other ETA reports may track some HGJTI/CBJTG participants if they participate in other ETA-funded programs.

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 data are needed both for program monitoring efforts to assist grantees and for external reporting. If grantees do not report quarterly, it will be challenging for ETA to discern problems and identify grantees needing

technical assistance. Ultimately, the quality of these programs could be compromised to the detriment of participating workers and employers. ETA's responsibility for reporting, oversight, and monitoring would be hampered because there is no other vehicle that provides ETA with data on the program performance of HGJTI and CBJT grants on a regular basis. The agency would be unable to fulfill its responsibilities under GPRA or to submit required information to OMB for completion of the PART.

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.

The public was given an opportunity to review and comment for sixty days through the *Federal Register* notice process. The notice was published in the *Federal Register* on January 5, 2011 (Vol. 76, p. 587). No comments were received.

On May 25, 2011, the Department published the second notification in the *Federal Register* (for a thirty day comment period) when submitting the information collection request to the Office of Management and Budget (OMB) for review and action. In response to this second notice, Professor Andrew Reamer of the George Washington University's Institute of Public Policy submitted comments to OMB. His comments, with the Agency's responses, below:

1) In section 2c of the ETA-9134 Form, Reamer recommended including information on quarterly wages earned for individuals reported as entered employment, entered training-related employment, and employment retention.

Agency Response: ETA currently collects this information on behalf of grantees through "CRIS," an agreement with the State of Kansas, whereby Kansas accesses wage data available through the Wage Record Interchange System to obtain aggregate Adult Common Measure performance outcomes for all program exiters for each grant to support federal performance reporting requirements. Although ETA recognizes that requiring grantees to report this information quarterly would return results sooner, this collection would duplicate current ETA efforts and increase the grantees' burden. Further, requesting grantees to acquire wage data does not create as consistent a picture of the results as is obtained through the administrative records already accessed.

2) In Section D.1.E of the High Growth and Community-Based Job Training Grant General Quarterly Reporting Forms and Instructions, Reamer recommended including an additional type of capacity building strategy, requiring grantees to routinely review updated workforce information and adjust training efforts accordingly.

Agency Response: ETA concurs with this idea; however, these specific activities are not required of all of the HGJTI and CBJT grants. Therefore, we cannot require grantees to take these steps or report on them. However, ETA will encourage this behavior through technical assistance to the grantees.

3) Lastly, Reamer recommended that ETA report to OMB on the potential use of the statewide longitudinal data system (SLDS) to improve common performance measure reporting by ETA grantees.

Agency Response: As noted above, through CRIS, on behalf of the grantees, the State of Kansas accesses wage data available through the Wage Record Interchange System to obtain aggregate performance measure outcomes for each grant to support federal performance reporting requirements. ETA currently uses CRIS for HGJTI and CBJT grantees to report against ETA-specific Adult Common Measure outcomes. ETA does not have a mechanism in place to require the use of the SLDS, nor does it need to require the use of an SDLS. ETA believes the agreement that it already has in place with the State of Kansas enables it to effectively calculate grantees' performance on the Adult Common Measures.

A.9 Payments to Respondents.

There are no payments to respondents other than the funds provided under the grant agreement.

A.10 Confidentiality

While this collection offers no assurance of confidentiality, ETA is responsible for protecting the confidentiality of participants' personally identifiable data and maintains 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. Grantee participant records are used to access wage records in order to calculate outcome results and are never used to identify individuals. To protect the confidentiality of program participants, the software that grantees use includes user functionality that allows program administrators to limit access to this information based on administrative clearance. Data Collection is done in a legal, ethical and professionally accepted manner. Various approaches are used to protect personal information; including computer technologies, statistical methodologies, and security procedures. These security measures ensure that only a restricted number of authorized people have access to private information and that access is only granted to conduct our work and for no other purposes. 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 especially as they apply

to the agency’s on-line grantee reporting system. The aggregate information collected through this request will not contain any individually identifying information.

A.11 Questions of a Sensitive Nature.

While grantees ask sensitive questions of participants in this data collection for the purpose of collecting demographic data, ETA collects only aggregate counts as part of the Quarterly Progress Report. Participant responses to these sensitive questions allow ETA to comprehensively evaluate the effectiveness of the HGJTI and the CBJT grant programs.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the HGJTI and CBJT grants has two components: (1) the burden for collection of participant data needed for the quarterly Standard Individual Record (SIR) and for calculation of the quarterly performance report (ETA 9143 Form, or QPR), and (2) the burden of preparing the Quarterly Progress Report. This response provides a separate burden for each of the two components.

1) Participant Data Collection Burden.

The participant data collection burden considers the amount of participant information collected for the SIR. It also includes the additional data needed to calculate the QPR. Thus the burden reflects the information collected solely to comply with the federal reporting requirements. This estimate does not include the burden associated with data that grantees would have to collect as part of their customary and usual burden to run the program. In the chart below, please see the annual figures for the HGJTI and CBJT grant estimates, first separately and then combined.

Program	Estimated Annual National Counts of Participants	Applicable Estimated Hourly Rate	Estimated Minutes per Record	Annual National Burden Hours	Annual National Burden Dollars (hours rate)
HGJTI	13,000	\$15.41	6	1,300	\$20,003
CBJT	54,000	\$15.41	6	5,400	\$83,214
Total	67,000	\$15.41	6	6,700	\$103,247

Staff’s conversations with five grantees indicate that grantees spend and average of 6 minutes to collect each element. For the purposes of reporting, grantees need to collect 10 data elements per participant: 4 elements included in the SIR record layout and 6 additional elements needed to calculate the QPR. This leads to an estimate of 6 minutes per record. The hourly rates used to calculate cost depend upon the type of organization

administering the program. For private nonprofit grantees, we use the estimated hourly rate of the average hourly earnings in the Census Bureau’s social assistance industry category (August 2010, Current Employment Statistics Survey, U.S. Census Bureau). Note: HGJTI and CBJT grants provide that grantees expend grant funds to comply with Federal reporting requirements.

In order to estimate the annual national counts of participants, ETA used the annual number of participants served reported by current HGJTI and CBJT grantees as the baseline for “Estimated Annual National Counts of Participants.” As the number of HGJTI and CBJT grants is not anticipated to increase, ETA expects this baseline data to remain consistent going forward.

2) Quarterly Progress Report Burden.

The HGJTI and CBJT grants quarterly progress report burden includes the burden to produce both the QPR and the report narrative. The burden to calculate the QPR includes program run times, checking, formatting, and transmitting the quarterly performance reports to ETA. This burden also includes the preparation and submission of the grantees’ SIR records (i.e. the exiter data necessary for the tracking of the Adult Common Measure outcomes). The burden to produce the report narrative includes the time it takes to write, review, and submit the report. Each of the four quarterly progress reports will require about 28 hours to prepare, generating an annual burden of 112 hours per grantee. This assumes 12 hours for the QPR and SIR submission, and 16 hours for the narrative report. We assume 40 High Growth grants, which is based on the current number of grants anticipated to be active after May 31, 2011, and 150 Community-Based grants, which is based upon the current number of grants anticipated to be active after May 31, 2011. Hence, the total annual burden is 30,464 hours, or \$327,542. Note: HGJTI and CBJT grants provide that grantees expend grant funds to comply with Federal reporting requirements.

In order to calculate the estimated preparation time, ETA reviewed the specific data elements required in each section of the QPR, the methods that grantees would use to collect this data, and the amount of data that would typically be submitted for these elements, and then calculated a typical Quarterly Progress Report Burden estimate based on those factors.

Program	Estimated Hours per Year per Grantee (28 hours x 4 responses)	Estimated Annual Number of Reporting Grantees	Annual National Hours	Applicable Estimated Hourly Rate	Estimated Annual National Burden Dollars (hours*rate)
HGJTI	112	40	4,480	\$15.41	\$69,036
CBJT	112	150	16,800	\$15.41	\$258,888
Total	112	190	21,280	\$15.41	\$327,924

Component Value	Responses	Hours	
Participant Data Collection Burden	67,000	6,700	\$103,247
Quarterly Progress Report Burden	760	21,280	\$327,924
Total	67,760	27,980	\$430,171

A.13 Estimated Cost to Respondents

Because grantees use funds from the grants to comply with Federal reporting requirements, costs are considered to be \$0 per grantee.

A.14 Estimates of Annualized Costs to Federal Government

ETA collects and maintains all quarterly reports through its Office of Performance and Technology's on-line Enterprise Business Support System (EBSS). Since the electronic mechanisms for collecting and storing grantee performance data on a quarterly basis are already in place to support other ETA programs, the annualized cost to the Federal government is *de minimus* and not accurately calculable through disaggregations.

A.15 Changes in Burden

The total number of HGJTI and CBJT grants awarded has decreased, therefore reducing the number of participants to be served through these grants. The burden hours have been revised to reflect the changes. (See A.12 above.)

Note: Following OMB's original approval on May 14, 2008 (OMB No. 1205-0465), ETA has made minor updates to the original quarterly performance report form (ETA-9134) and High Growth and Community-Based Job Training Grants: Quarterly Reporting Forms & Instructions, and included a Reporting Glossary and Guide; shaded specific areas of ETA- 9134 to enhance legibility; changed 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; renamed sections "B. Customer Summary Information" and "C. Customer Services and Activities" to make it clear that these sections contain participant summary information and participant services and activities information; made minor formatting updates to section C.2c to make it clear that training-related employment is a sub-category of "Number Entered Employment," and that these data elements are reported in real-time, when employment is obtained; renamed the "number received degree/certificate" data element to "number received credential" to clarify that degrees and certificates are examples of credentials, and that these data elements can be reported in real-time, when credentials are received; incorporated the Reporting and Glossary Guide, which has previously been provided as a supplemental technical assistance material to grantees; and added "Type of Credentials Received," "Total Credentials Received," and "Employment Retention" data elements, which are applicable only to CBJT

grants awarded under SGA/DFA PY-09-07, as it aligns with the outcomes identified in their grant Statements of Work.

All updates improve the clarity and effectiveness of these reporting materials. These changes will not lead to any resulting change in burden.

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

Grantees submit narrative reports and performance reports through ETA's on-line reporting system on a quarterly basis to ETA within 45 days of the end of each quarter. Quarterly progress 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 management and budget reports, and other ad hoc reports, which 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.