

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT OF 1995**

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A. JUSTIFICATION

This document provides the justification for the request by the Department of Labor, Employment and Training Administration (ETA) for approval to implement new reporting requirements for the Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant program. ETA will require grantees to submit Quarterly Progress Reports with a narrative summary of at least two progress measures and at least two implementation measures identified by the grantee in their project work plan. Every fourth quarter, grantees will be required to submit an Annual Performance Report with standardized outcome measures that will include aggregate data for program participants and a comparison cohort of participants for the following seven outcome measures: entered employment rate, employment retention rate, average earnings, attainment of credits toward degree(s), attainment of certificate(s) (less than one year), attainment of certificate(s) (more than one year), and graduation rate for degree programs. These reports will help ETA gauge the effects of the TAACCCT grants, identify grantees that could serve as useful models, and target technical assistance appropriately. Attachment A contains the reporting instructions.

A.1 Reasons for Data Collection.

ETA's statutory authority to administer this program, issue guidelines including performance reporting by grantees, and assess the impact of each award on workers served by grantees comes from section 1872 of the Trade and Globalization Adjustment Assistance Act of 2009 (Division B, Title I, Subtitle I of the American Recovery and Reinvestment Act of 2009, Public Law 111-5) (19 U.S.C 2372a), as amended by the Health Care and Education Reconciliation Act of 2010, Public Law 111-152.

Specifically, 19 U.S.C. 2372 - 2372a requires that the Secretary prepare and submit to Congress an annual report regarding the programs and activities carried out under the TAACCCT grant program, providing:

- A description of each grant awarded during the preceding fiscal year
- An assessment of the impact of each award in a fiscal year preceding the fiscal year referred to in paragraph (1) on workers receiving training under the TAA for Workers Program

The data collection is designed to help ETA and grantees assess progress made against the grant statements of work, or grant plans, as submitted to ETA during consideration for funding. The descriptions of progress against grantee-defined progress and implementation measures allows grantees flexibility to show success or challenges against their own unique programs. In addition, ETA will require standard quantitative data collection in order to help monitor participants served and outcomes achieved across grants in a similar way. In fact, ETA will require grantees to collect and report on the common performance measures that are applied across other programs administered by ETA. The common measures help

to describe the core purposes of related investments: How many people found jobs? Did people stay employed? What were the average earnings?

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

ETA will use the information grantees report for the following purposes:

1. To provide program and performance information to stakeholders, including participants, employers, taxpayers, Congress, and others;
2. To inform continuous improvement of 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 and outcome summaries; and,
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 as required.

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

Failure to collect this information will mean that there is no data available to show the outcomes of the Federal investment in this program. It would also mean that ETA is not able to provide oversight and monitoring of this Federal investment.

A.3 Technology and Obstacles Affecting Reporting Burden.

To comply with the Government Paperwork Elimination Act, ETA has streamlined the collection of aggregate data and the preparation of quarterly reports by providing uniform report formats and data definitions to grantees across ETA programs. All the TAACCCT reports will be submitted to ETA via the Internet. It is left to grantees to select the technology to collect aggregate data according to their unique circumstances and resource availability.

A.4 Efforts to Identify Duplication.

TAACCCT grantees will be required to submit quarterly financial reports. However, the proposed reports are the only reports currently required for TAACCCT grantees to report on program performance. Other ETA reports may track some TAACCCT participants if they participate in other ETA-funded programs.

A.5 Methods to Minimize Burden on Small Businesses.

Some small businesses may be contacted by grantees to obtain information on participants' outcomes, such as post-program employment and earnings information. Grantees can reduce a portion of this burden by collecting information directly from participants or via administrative wage records.

A.6 Consequences of Less-Frequent Data Collection.

The data are needed both for program monitoring efforts to assist grantees and for ETA to provide information to the public on this program. If grantees do not report quarterly, ETA will be unable 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 for judging the progress and performance of TAACCCT grants. The agency would be unable to fulfill its responsibilities under GPRA or to submit required information to OMB for completion of the PART as required.

A.7 Special Circumstances Involved in Collection of Data.

There are no special circumstances for data collection related to the quarterly narrative or aggregate data reported every fourth quarter under the grant agreement. Any adjustments necessary for using supplemental information as the data source will be addressed in separate program guidance.

A.8 Preclearance Notices and Responses.

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to comment on the Federal Register Notice published July 5, 2011 (Vol. 76, p 39128). No comments were received.

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 information collection makes no express assurance of confidentiality, ETA is responsible for protecting the privacy of the TACT participant and performance data and will maintain the data in accordance with all applicable Federal laws, with particular emphasis on compliance with the provisions of the Privacy and Freedom of Information Acts. This data is covered by a System of Records Notice, DOL/ETA-15, published April 8, 2002 (67 FR 16898 et seq). 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 privacy of the data. The aggregate information collected through this request will not contain any individually identifying information.

A.11 Outcomes of a Sensitive Nature.

While grantees will ask sensitive questions of participants in the proposed data collection for the purpose of collecting demographic and outcome data, ETA will only collect aggregate data summarizing participants and their experiences every fourth quarter as part of the Annual Performance Report. Participant responses to these sensitive questions will allow ETA and the grantees to comprehensively evaluate the effectiveness of the TAACCCT grant program.

A.12 Estimates of the Burden of Data Collection.

The annual national burden for the TAACCCT grants has three components: (1) the burden for collection of data needed on individual participants in order to calculate the Annual Performance Report (APR) , (2) the burden of preparing the narrative for the Quarterly Progress Report (QPR), and (3) the burden of preparing the APR. Below we describe the burden related to each of these components.

1) Participant Data Collection Burden.

The participant data collection burden considers both the amount of individual participant information collected by a grantee that is necessary for a grantee to provide aggregate annual data as reflected in the Annual Performance Report (APR), and the amount of information provided by participants. 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 figures for the TAACCCT grant estimates.

TAACCCT Data Collection Burden	Estimated Annual National Counts of Participant Responses	Applicable Estimated Hourly Rate ¹	Estimated Minutes per Record	Annual National Burden Hours	Annual National Burden Dollars (hours*rate)
Grantees	168,197	\$15.41	3.0	8,410	\$129,598
Participants and	168,197	\$15.41	3.0	8,410	\$129,598

¹ The estimated hourly rate is the same for all rows, as it is the total estimated hourly rate.

Comparison Cohort Students					
TOTAL	336,394	\$15.41	6.0	16,820	\$259,196

For the purposes of determining the participant count, we assumed 84,099 participants annually based on grant programs of similar size and scope. This figure was multiplied by two to account for the required reporting on a comparison cohort of students who are not enrolled in grant-funded programs for a total of 168,197 individuals from whom data will be collected.

We assume that grantees will spend 0.3 minutes total to collect each element, and that participants will spend 0.3 minutes total to provide each element for a total data collection time of 0.6 minutes. For the purposes of reporting, grantees will need to collect 10 data elements per participant to calculate the aggregate totals for the annual performance report. This leads to an estimate of 3.0 minutes per record for grantees and 3.0 minutes per record for participants for a total of 6.0 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). Therefore, the total annual burden is 16,820 hours, or \$259,196, split equally between the grantees and the participants.

2) Quarterly Progress Report Burden.

The burden to produce the TAACCCT narrative for the quarterly progress report includes the time it takes to write, review, and submit the report. Each of the four narrative reports will require about 22 hours to prepare, generating an annual burden of 88 hours per grantee. We assume 50 grants per year, with each grant lasting 3 years. Hence, the total annual burden is 4,400 hours, or \$67,804.

Program	Estimated Hours per Year per Grantee (22 hours x 4 responses)	Estimated Annual Number of Reporting Grantees	Annual National Hours	Applicable Estimated Hourly Rate	Estimated Annual National Burden Dollars (hours*rate)
TAACCCT	88	50	4,400	\$15.41	\$67,804

3) Annual Performance Report Burden.

The TAACCCT annual report burden includes program run times, checking, formatting, and transmitting the annual performance reports to ETA. Each annual

report will require about 48 hours for the APR. We assume 50 grants per year, with each grant lasting 3 years. Hence, the total annual burden is 2,400 hours, or \$36,984.

Program	Estimated Hours per Year per Grantee (48 hours x 1 response)	Estimated Annual Number of Reporting Grantees	Annual National Hours	Applicable Estimated Hourly Rate	Estimated Annual National Burden Dollars (hours*rate)
TAACCCT	48	50	2,400	\$15.41	\$36,984

Component Value	Responses	Hours
1) Total Participant Data Collection Burden \$259,196	336,394	16,820
2) Quarterly Progress Report Burden \$67,804	200	4,400
3) Annual Performance Report Burden	50	2,400
<u>\$36,984</u>		
Total 23,620		336,644
	\$363,984	

A.13 Estimated Cost to Respondents.

Grantees can use grant funds to comply with Federal reporting requirements; as such, 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 Information Security 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 (maintaining the quarterly and annual reports and records through EBSS, matching SIR data with state UI wage records and other Federal employment databases, generating quarterly performance reports and any program close-out activities) for TAACCCT grant reports is minimal.

A.15 Changes in Burden.

There is no prior burden estimate because this reporting requirement is new.

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

Grantees submit quarterly progress reports and annual performance reports through ETA's on-line reporting system to ETA within 45 days of the end of each quarter. Quarterly progress and annual performance report data is analyzed by ETA staff and used to evaluate outcomes and program effectiveness.

Each year, ETA issues a report summarizing program performance based on the Secretary's goals. Data contained in the quarterly and annual 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 for OMB approval will be displayed. Once OMB approval is received, ETA will issue a Training and Employment Guidance Letter that will formally transmit to grantees the reporting package that includes the following statement: "It is estimated that, on average, the time needed per respondent to complete and submit the data collection and annual performance reports will be 88 hours annually for participant data collection, and 48 hours annually for quarterly progress reporting. You may submit any comments regarding these reporting documents to: The Performance and Results Office, U.S. Department of Labor, Employment and Training Administration, 200 Constitution Avenue, NW Room N5306, Washington, DC, 20210. Please include Paperwork Reduction Act 1205-0NEW with your correspondence."

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.