

**(1205-0455) SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT OF 1995**

A. JUSTIFICATION

This is a justification for the Department of Labor, Employment and Training Administration's (ETA) request to extend, with revisions, approval for the reporting and recordkeeping requirements and to change the name of the reporting system for the Prisoner Reentry Initiative, now called Reintegration of Ex-Offenders-Adult Reporting System (RExO-Adult). This reporting structure features standardized data collection for program participants and quarterly progress and Management Information System (MIS) report formats. All data collection and reporting is done by the faith-based and community organization (FBCO) grantees or their subgrantees.

The quarterly progress reports provide a detailed, narrative account of program activities, accomplishments, and progress toward performance outcomes during the quarter. The quarterly performance reports include aggregate and participant-level information on demographic characteristics, types of services received, placements, outcomes, and follow-up status. Specifically, these reports collect data on individuals who receive employment training and placement services, housing assistance, mentoring, and other services essential to reintegrating ex-offenders through PRI programs.

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 helps improve the quality of performance information that is received by ETA.

The BeneChoice information collection appended to this ICR is cancelled, along with Form ETA-9140A, because that grantee program concluded.

A.1 Circumstances Necessitating Data Collection

The Reintegration of Ex-Offenders-Adult program is a Workforce Investment Act (WIA) demonstration grant designed to reduce recidivism by helping inmates find work when they return to their communities. RExO-Adult programs incorporate employment training, mentoring, housing assistance, and other reintegration services in coordination with businesses, One-Stop Centers, educational institutions, local housing authorities, and the criminal justice system. In addition to reporting participant information and performance-related outcomes, RExO-Adult grantees must demonstrate their ability to establish effective partnerships with the criminal justice system, local Workforce Investment Boards, local housing authorities, and other partner agencies. They must also demonstrate the cost effectiveness of their projects. The reporting and recordkeeping system incorporates each of these aspects necessary for program evaluation.

Five outcome measures are used to measure success in the RExO-Adult grants: entered employment rate, employment retention rate, attainment of a degree or certificate, average six month post-program earnings, and recidivism rate. Several of these conform to the common performance measures implemented across federal job training programs as of July 1, 2005. By standardizing the reporting and performance requirements of different programs, the common measures give ETA the ability to compare across programs the core goals of the workforce system—how many people entered jobs; how many stay employed; and how many successfully completed an educational program. In addition to the five outcome measures, grantees report on a number of leading indicators that serve as predictors of success. These include participation in education or training, attainment of degrees and certificates, workforce preparation, mentoring, community service, reduced substance abuse, proportion of enrollees in stable housing, and proportion of enrollees complying with parole conditions.

In applying for the RExO-Adult grants, FBCOs and their sub-grantees agree to submit participant data and aggregate reports on enrollee characteristics, services provided, placements, outcomes, and follow-up status. Grantees collect and report quarterly RExO-Adult performance data using an ETA-provided MIS. The MIS is a web-based case management and reporting application housed on ETA's servers.

The RExO-Adult data is evaluated by ETA to determine program effectiveness. This evaluation includes the extent to which the RExO-Adult program improves the employment competencies of participants in comparison to comparably situated individuals who did not participate in the program, and the extent to which the RExO-Adult program increases the level of employment over that which would have existed in the absence of the program. Following are statutory sections in the Workforce Evaluation Act that authorize this data collection:

- **WIA section 171 (a-b)**

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- SEC. 171. DEMONSTRATION, PILOT, MULTISERVICE, RESEARCH, AND MULTISTATE PROJECTS.
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- (a) Strategic Plan.--
- (1) In general.--After consultation with States, localities, and other interested parties, the Secretary shall, every 2 years, publish in the Federal Register, a plan that describes the demonstration and pilot (including dislocated worker demonstration and pilot), multiservice, research, and multistate project priorities of the Department of Labor concerning employment and training for the 5-year period following the submission of the plan. Copies of the plan shall be transmitted to the appropriate committees of Congress.
- (2) Factors.--The plan published under paragraph (1) shall contain strategies to address national employment and training problems and take into account factors such as--
- (A) the availability of existing research (as of the date of the publication);
- (B) the need to ensure results that have interstate validity;
- (C) the benefits of economies of scale and the efficiency of proposed projects; and
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- (D) the likelihood that the results of the projects will be
- useful to policymakers and stakeholders in addressing
- employment and training problems.
- (b) Demonstration and Pilot Projects.--
- (1) In general.--Under a plan published under subsection (a),
- the Secretary shall, through grants or contracts, carry out
- demonstration and pilot projects for the purpose of developing and
- implementing techniques and approaches, and demonstrating the
- effectiveness of specialized methods, in addressing employment and
- training needs. Such projects shall include the provision of direct
- services to individuals to enhance employment opportunities and an
- evaluation component and may include--
- (A) the establishment of advanced manufacturing technology
- skill centers developed through local partnerships of industry,
- labor, education, community-based organizations, and economic
- development organizations to meet unmet, high-tech skill needs
- of local communities;
- (B) projects that provide training to upgrade the skills of
- employed workers who reside and are employed in enterprise
- communities or empowerment zones;
- (C) programs conducted jointly with the Department of
- Defense to develop training programs utilizing computer-based
- and other innovative learning technologies;
- (D) projects that promote the use of distance learning,
- enabling students to take courses through the use of media
- technology such as videos, teleconferencing computers, and the
- Internet;
- (E) projects that assist in providing comprehensive
- services to increase the employment rates of out-of-school
- youth residing in targeted high poverty areas within
- empowerment zones and enterprise communities;
- (F) the establishment of partnerships with national
- organizations with special expertise in developing, organizing,
- and administering employment and training services, for
- individuals with disabilities, at the national, State, and
- local levels;
- (G) projects to assist public housing authorities that
- provide, to public housing residents, job training programs
- that demonstrate success in upgrading the job skills and
- promoting employment of the residents; and
- (H) projects that assist local areas to develop and
- implement local self-sufficiency standards to evaluate the
- degree to which participants in programs under this title are
- achieving self-sufficiency.
- (2) Limitations.--
- (A) Competitive awards.--Grants or contracts awarded for
- carrying out demonstration and pilot projects under this
- subsection shall be awarded only on a competitive basis, except
- that a noncompetitive award may be made in the case of a
- project that is funded jointly with other public or private
- sector entities that provide a portion of the funding for the
- project.
- (B) Eligible entities.--Grants or contracts may be awarded
- under this subsection only to--
- (i) entities with recognized expertise in--
- (I) conducting national demonstration projects;
- (II) utilizing state-of-the-art demonstration

- methods; or
- (III) conducting evaluations of workforce investment projects; or
- (ii) State and local entities with expertise in operating or overseeing workforce investment programs.
- (C) Time limits.--The Secretary shall establish appropriate time limits for carrying out demonstration and pilot projects under this subsection.

• **WIA section 172**

• SEC. 172. EVALUATIONS.

• (a) Programs and Activities Carried Out Under This Title.--For the purpose of improving the management and effectiveness of programs and activities carried out under this title, the Secretary shall provide for the continuing evaluation of the programs and activities, including those programs and activities carried out under section 171. Such evaluations shall address--

• (1) the general effectiveness of such programs and activities in relation to their cost, including the extent to which the programs and activities--

• (A) improve the employment competencies of participants in comparison to comparably-situated individuals who did not participate in such programs and activities; and

• (B) to the extent feasible, increase the level of total employment over the level that would have existed in the absence of such programs and activities;

• (2) the effectiveness of the performance measures relating to such programs and activities;

• (3) the effectiveness of the structure and mechanisms for delivery of services through such programs and activities;

• (4) the impact of the programs and activities on the community and participants involved;

• (5) the impact of such programs and activities on related programs and activities;

• (6) the extent to which such programs and activities meet the needs of various demographic groups; and

• (7) such other factors as may be appropriate.

• (b) Other Programs and Activities.--The Secretary may conduct evaluations of other federally funded employment-related programs and activities under other provisions of law.

• (c) Techniques.--Evaluations conducted under this section shall utilize appropriate methodology and research designs, including the use of control groups chosen by scientific random assignment methodologies. The Secretary shall conduct as least 1 multisite control group evaluation under this section by the end of fiscal year 2005.

• (d) Reports.--The entity carrying out an evaluation described in subsection (a) or (b) shall prepare and submit to the Secretary a draft report and a final report containing the results of the evaluation.

• (e) Reports to Congress.--Not later than 30 days after the completion of such a draft report, the Secretary shall transmit the draft report to the Committee on Education and the Workforce of the House of Representatives and the Committee on Labor and Human Resources of the Senate. Not later than 60 days after the completion of such a final report, the Secretary shall transmit the final report to such

- committees of the Congress.
- (f) Coordination.--The Secretary shall ensure the coordination of
- evaluations carried out by States pursuant to section 136(e) with the
- evaluations carried out under this section.

• **WIA section 185**

• SEC. 185. REPORTS; RECORDKEEPING; INVESTIGATIONS.

• (a) Reports.--

• (1) In general.--Recipients of funds under this title shall

• keep records that are sufficient to permit the preparation of

• reports required by this title and to permit the tracing of funds

• to a level of expenditure adequate to ensure that the funds have

• not been spent unlawfully.

• (2) Submission to the secretary.--Every such recipient shall

• maintain such records and submit such reports, in such form and

• containing such information, as the Secretary may require regarding

• the performance of programs and activities carried out under this

• title. Such records and reports shall be submitted to the Secretary

• but shall not be required to be submitted more than once each

• quarter unless specifically requested by Congress or a committee of

• Congress, in which case an estimate may be provided.

• (3) Maintenance of standardized records.--In order to allow for

• the preparation of the reports required under subsection (c), such

• recipients shall maintain standardized records for all individual

• participants and provide to the Secretary a sufficient number of

• such records to provide for an adequate analysis of the records.

• (4) Availability to the public.--

• (A) In general.--Except as provided in subparagraph (B),

• records maintained by such recipients pursuant to this

• subsection shall be made available to the public upon request.

• (B) Exception.--Subparagraph (A) shall not apply to--

• (i) information, the disclosure of which would

• constitute a clearly unwarranted invasion of personal

• privacy; and

• (ii) trade secrets, or commercial or financial

• information, that is obtained from a person and privileged

• or confidential.

• (C) Fees to recover costs.--Such recipients may charge fees

• sufficient to recover costs applicable to the processing of

• requests for records under subparagraph (A).

• (b) Investigations of Use of Funds.--

• (1) In general.--

• (A) Secretary.--In order to evaluate compliance with the

• provisions of this title, the Secretary shall conduct, in

• several States, in each fiscal year, investigations of the use

• of funds received by recipients under this title.

• (B) Comptroller general of the United States.--In order to

• ensure compliance with the provisions of this title, the

• Comptroller General of the United States may conduct

• investigations of the use of funds received under this title by

• any recipient.

• (2) Prohibition.--In conducting any investigation under this

• title, the Secretary or the Comptroller General of the United

• States may not request the compilation of any information that the

- recipient is not otherwise required to compile and that is not
- readily available to such recipient.
- (3) Audits.--
- (A) In general.--In carrying out any audit under this title
- (other than any initial audit survey or any audit investigating
- possible criminal or fraudulent conduct), either directly or
- through grant or contract, the Secretary, the Inspector General
- of the Department of Labor, or the Comptroller General of the
- United States shall furnish to the State, recipient, or other
- entity to be audited, advance notification of the overall
- objectives and purposes of the audit, and any extensive
- recordkeeping or data requirements to be met, not later than 14
- days (or as soon as practicable), prior to the commencement of
- the audit.
- (B) Notification requirement.--If the scope, objectives, or
- purposes of the audit change substantially during the course of
- the audit, the entity being audited shall be notified of the
- change as soon as practicable.
- (C) Additional requirement.--The reports on the results of
- such audits shall cite the law, regulation, policy, or other
- criteria applicable to any finding contained in the reports.
- (D) Rule of construction.--Nothing contained in this title
- shall be construed so as to be inconsistent with the Inspector
- General Act of 1978 (5 U.S.C. App.) or government auditing
- standards issued by the Comptroller General of the United
- States.
- (c) Accessibility of Reports.--Each State, each local board, and
- each recipient (other than a subrecipient, subgrantee, or contractor of
- a recipient) receiving funds under this title--
- (1) shall make readily accessible such reports concerning its
- operations and expenditures as shall be prescribed by the
- Secretary;
- (2) shall prescribe and maintain comparable management
- information systems, in accordance with guidelines that shall be
- prescribed by the Secretary, designed to facilitate the uniform
- compilation, cross tabulation, and analysis of programmatic,
- participant, and financial data, on statewide, local area, and
- other appropriate bases, necessary for reporting, monitoring, and
- evaluating purposes, including data necessary to comply with
- section 188; and
- (3) shall monitor the performance of providers in complying
- with the terms of grants, contracts, or other agreements made
- pursuant to this title.
- (d) Information To Be Included in Reports.--
- (1) In general.--The reports required in subsection (c) shall
- include information regarding programs and activities carried out
- under this title pertaining to--
- (A) the relevant demographic characteristics (including
- race, ethnicity, sex, and age) and other related information
- regarding participants;
- (B) the programs and activities in which participants are
- enrolled, and the length of time that participants are engaged
- in such programs and activities;
- (C) outcomes of the programs and activities for
- participants, including the occupations of participants, and
- placement for participants in nontraditional employment;
- (D) specified costs of the programs and activities; and

- (E) information necessary to prepare reports to comply with
- section 188.
- (2) Additional requirement.--The Secretary shall ensure that
- all elements of the information required for the reports described
- in paragraph (1) are defined and reported uniformly.
- (e) Quarterly Financial Reports.--
- (1) In general.--Each local board in the State shall submit
- quarterly financial reports to the Governor with respect to
- programs and activities carried out under this title. Such reports
- shall include information identifying all program and activity
- costs by cost category in accordance with generally accepted
- accounting principles and by year of the appropriation involved.
- (2) Additional requirement.--Each State shall submit to the
- Secretary, on a quarterly basis, a summary of the reports submitted
- to the Governor pursuant to paragraph (1).
- (f) Maintenance of Additional Records.--Each State and local board
- shall maintain records with respect to programs and activities carried
- out under this title that identify--
- (1) any income or profits earned, including such income or
- profits earned by subrecipients; and
- (2) any costs incurred (such as stand-in costs) that are
- otherwise allowable except for funding limitations.
- (g) Cost Categories.--In requiring entities to maintain records of
- costs by category under this title, the Secretary shall require only
- that the costs be categorized as administrative or programmatic costs.WIA
- section 188

• SEC. 188. NONDISCRIMINATION.

- (a) In General.--
- (1) Federal financial assistance.--For the purpose of applying
- the prohibitions against discrimination on the basis of age under
- the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.), on the
- basis of disability under section 504 of the Rehabilitation Act of
- 1973 (29 U.S.C. 794), on the basis of sex under title IX of the
- Education Amendments of 1972 (20 U.S.C. 1681 et seq.), or on the
- basis of race, color, or national origin under title VI of the
- Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.), programs and
- activities funded or otherwise financially assisted in whole or in
- part under this Act are considered to be programs and activities
- receiving Federal financial assistance.
- (2) Prohibition of discrimination regarding participation,
- benefits, and employment.--No individual shall be excluded from
- participation in, denied the benefits of, subjected to
- discrimination under, or denied employment in the administration of
- or in connection with, any such program or activity because of
- race, color, religion, sex (except as otherwise permitted under
- title IX of the Education Amendments of 1972), national origin,
- age, disability, or political affiliation or belief.
- (3) Prohibition on assistance for facilities for sectarian
- instruction or religious worship.--Participants shall not be
- employed under this title to carry out the construction, operation,
- or maintenance of any part of any facility that is used or to be
- used for sectarian instruction or as a place for religious worship
- (except with respect to the maintenance of a facility that is not
- primarily or inherently devoted to sectarian instruction or
- religious worship, in a case in which the organization operating

- the facility is part of a program or activity providing services to participants).
- (4) Prohibition on discrimination on basis of participant status.--No person may discriminate against an individual who is a participant in a program or activity that receives funds under this title, with respect to the terms and conditions affecting, or rights provided to, the individual, solely because of the status of the individual as a participant.
- (5) Prohibition on discrimination against certain noncitizens.--Participation in programs and activities or receiving funds under this title shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States.
- (b) Action of Secretary.--Whenever the Secretary finds that a State or other recipient of funds under this title has failed to comply with a provision of law referred to in subsection (a)(1), or with paragraph (2), (3), (4), or (5) of subsection (a), including an applicable regulation prescribed to carry out such provision or paragraph, the Secretary shall notify such State or recipient and shall request that the State or recipient comply. If within a reasonable period of time, not to exceed 60 days, the State or recipient fails or refuses to comply, the Secretary may--
- (1) refer the matter to the Attorney General with a recommendation that an appropriate civil action be instituted;
- or
- (2) take such other action as may be provided by law.
- (c) Action of Attorney General.--When a matter is referred to the Attorney General pursuant to subsection (b)(1), or whenever the Attorney General has reason to believe that a State or other recipient of funds under this title is engaged in a pattern or practice of discrimination in violation of a provision of law referred to in subsection (a)(1) or in violation of paragraph (2), (3), (4), or (5) of subsection (a), the Attorney General may bring a civil action in any appropriate district court of the United States for such relief as may be appropriate, including injunctive relief.
- (d) Job Corps.--For the purposes of this section, Job Corps members shall be considered as the ultimate beneficiaries of Federal financial assistance.
- (e) Regulations.--The Secretary shall issue regulations necessary to implement this section not later than one year after the date of the enactment of the Workforce Investment Act of 1998. Such regulations shall adopt standards for determining discrimination and procedures for enforcement that are consistent with the Acts referred to in a subsection (a)(1), as well as procedures to ensure that complaints filed under this section and such Acts are processed in a manner that avoids duplication of effort.

• **WIA section 189(d)**

• SEC. 189. ADMINISTRATIVE PROVISIONS.

- (d) Annual Report.--The Secretary shall prepare and submit to Congress an annual report regarding the programs and activities carried out under this title. The Secretary shall include in such report--
- (1) a summary of the achievements, failures, and problems of the programs and activities in meeting the objectives of this

- title;
- (2) a summary of major findings from research, evaluations, pilot projects, and experiments conducted under this title in the fiscal year prior to the submission of the report;
- (3) recommendations for modifications in the programs and activities based on analysis of such findings; and
- (4) such other recommendations for legislative or administrative action as the Secretary determines to be appropriate.

A.2 How, by Whom, and For What Purpose the Information is to be Used

Grantees carry out recordkeeping and reporting requirements with grant funds. As a government-procured MIS is provided to all grantees, their implementation costs will be minimized. Grant funds may also be used with the prior approval of the grant officer to upgrade computer hardware and internet access to enable projects to use the MIS.

Grantees enter data into the MIS on individuals who receive services through RExO-Adult programs and their partnerships with One-Stop Centers, local Workforce Investment Boards, employment providers, the criminal justice system, and the local housing authority. These data are used by the Department and ETA to evaluate performance and delivery of RExO-Adult program services. Attachment A contains a list of the required data elements to be collected in the MIS and the purpose for collecting each item. The MIS allows grantees to collect additional participant data beyond those elements required by RExO-Adult.

ETA uses the data to track total participants, characteristics, services, and outcomes for released prisoner participants. Additionally, ETA analyzes the data to (1) determine the delivery of core employment services within the WIA framework; (2) study performance outcomes vis-à-vis performance measures, policies, and procedures; and (3) help drive the workforce investment system toward continuous improvement of outcomes and integrated service delivery for released prisoners. Common measures enhance ETA's ability to assess the effectiveness of the PRI program within the broader workforce investment system.

Within ETA, the data are used by the Offices of Workforce Investment, Financial and Administrative Management, Policy Development and Research, Performance and Technology, and Field Operations (including the regional offices). Other DOL users include the Offices of the Assistant Secretary for ETA and Assistant Secretary for Policy.

The reports and other analyses of the data are made available to the public through publication and other appropriate methods and to the appropriate congressional committees through copies of such reports. In addition, information obtained through the MIS information and reporting system is used at the national level during budget and allocation hearings for DOL compliance with the Government Performance and Results Act (GPRA) and other legislative requirements, and during legislative reauthorization proceedings.

A.3 Use of Technology to Reduce Burden

All RExO-Adult data and reports are submitted to ETA via the internet. Grantees collect, retain, and report all information electronically through the ETA-provided MIS.

A.4 Efforts to Identify Duplication

A hallmark of WIA Title I is increased accountability in exchange for optimal flexibility. Title I has strengthened accountability by requiring more comprehensive performance standards and establishing quarterly reports for demonstration projects. The data items on the individual MIS records support the measures, and much of these data are used by grantees to prepare the quarterly progress reports.

ETA has minimized the reporting burden by establishing the number of data elements required commensurate with the level of resources expended and services received. Data items collected by program reports and individual records are needed to: (1) account for the detailed services and mentoring provided by multiple agencies to help participants get and keep well paying jobs and obtain stable housing; (2) better identify overlapping and unproductive duplication of services; and (3) reduce the effect of stove-piped data and generate performance information across employment and training programs. Information provided through the RExO-Adult management information and reporting system is not available through other data collection and report systems.

A.5 Methods to Minimize Burden on Small Businesses

For reporting purposes, the involvement of small businesses or other small entities who are not grantees or sub-grantees is extremely limited. The only time contacting them may be required is during the provision of a service. Methods to minimize the burden on small entities that are grantees or subgrantees are discussed in other sections of this supporting statement.

A.6 Consequences of Less-Frequent Data Collection

29 CFR 95.51(b) (59 F.R. 38271, July 27, 1994), which governs monitoring and reporting program performance under grants and agreements with non-profit organizations, states that quarterly reports shall be due 30 days after the reporting period. If ETA did not comply with these requirements, funding for demonstration programs would be compromised. In applying for RExO-Adult grants, grantees agree to meet ETA's reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY-04-08), which requires the submission of quarterly reports within 30 days after the end of the quarter.

A.7 Special Circumstances for Data Collection

These data collection efforts do not involve any special circumstances.

A.8 Federal Register Notice and Consultation Outside the Agency

The public was given an opportunity to review and comment through the Federal Register notice process. The notice was published in the Federal Register on November 4, 2011 (Vol. 76, No. 214, p. 68509 et seq.). No comments were received.

A.9 Payment of Gifts to Respondents

There are no payments of gifts to respondents.

A.10 Confidentiality Assurances

ETA is responsible for protecting the privacy of the RExO-Adult participant and performance data and maintaining 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. 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 data. ETA's Office of Information Systems and Technology (OIST) has been an active participant in the development and approval of data security measures – especially as they apply to the web-based version of the RExO-Adult system.

A key concern is for the protection of participant social security numbers (SSNs), which is voluntarily provided by the individual as part of this information collection request. The SSN is being requested in order for grantees to properly determine that the individual is eligible to participate in the RExO-Adult program, ensure data integrity, and, to the extent practicable, track program participant outcomes through state wage record systems. The RExO-Adult system also includes a statement that informs the individual where the information he/she has provided is being stored, the name and location of the system, and that the information is protected in accordance with the Privacy Act. When participant files are retrieved within the RExO-Adult 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 specific individuals.

A.11 Additional Justification for Sensitive Questions

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, security is built into the data collection system by the MIS contractor. Participant responses to these sensitive questions allow ETA to comprehensively evaluate the effectiveness of the RExO-Adult program.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the RExO-Adult reporting system has three components: (1) the participant data collection burden; (2) the quarterly narrative progress report burden; and (3) the quarterly performance report burden. This response provides a separate burden for each of the three components.

(1). Participant Data Collection Burden

The RExO-Adult *participant data collection burden* considers the amount of participant and performance-related information collected and reported on the participant record 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 data collection burden varies by participant based on the range and intensity of services provided by the grantee and its partnerships with One-Stop Centers, local Workforce Investment Boards, employment providers, the criminal justice system, the grantee programs run by the U.S. Department of Justice, and local housing authorities. For example, data collection may involve acquiring information from the various partner agencies regarding employment training and placement, housing assistance, mentoring, parole, and probation, in addition to the collection of personal and demographic information by the grantees themselves.

To arrive at the average annual figure of 1.3 hours per participant record, Mathematica, the contractor which computed the original data for this submission when it was a new initiative, assessed the time for entries by grantees based on scenarios postulating a variety of services possible for a range of anticipated participants. This information, in turn, was based on similar programs of this sort, including Justice Department programs.

Finally, RExO-Adult program managers consulted with grantees who have collected this information over the past several years to verify that 1.3 hours, as an average figure devoted for MIS for the estimated 5,700 participants, averaged out among the grantees, represented the best estimate of time devoted to data entry for each participant, given the range of entries anticipated for each participant, as described above. These grantees affirmed this estimate.

Participants' time in providing the information to grantees collecting this data is estimated at .5 hours per participant.

The PY 2012 number of grantees is reduced from the number included in the PY 2008 approval request. Fewer grantees are being awarded now compared to previous years because funds are no longer being mortgaged. Grantees are being provided the full grant award in the initial grant award year which means that fewer grants are awarded each year but they are provided with larger grant awards up front for the full period of performance. Regarding the estimated 5,700 participants for 2012, it is noted that the grantees are in different years in their grants, and those in the final drawdowns are serving fewer participants than those in their initial years of grant-funded activity. To estimate the participants for 2012, the initiative's efficiency measure of \$3,000 expended per participant was compared with each grant's expected first-year funding

level, which determined the number of those who could be served by each grantee per year. This estimate of the number of participants served through this grant program is also based on the MIS data collected thus far. By dividing the estimated 5,700 participants among the 38 current and anticipated grantees, one arrives at the average per grantee, given the broad range of years into the grant and range of activities and number of potential participants represented by each grantee, of 150 persons per grant: 5,700 divided by 38 = 150.

Estimated National Count:

Record Type	Av Hrs. Per Record	PY 12 Estimated National Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Participant data collected by grantees	1.3	5,700	7410	\$10.75	\$79,658

Record Type	Av Hrs. Per Record	PY 12 Estimated National Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Participant data provided by individual program participants	.5	5,700	2850	\$10.75	\$30,638

Hourly rates used to calculate cost depend upon the type of organization administering the program. For private non-profit grantees, the hourly rate is the average hourly earnings in the Census Bureau's social assistance industry category (May 2003, Current Employment Statistics Survey, U.S. Census Bureau). An identical amount was postulated for participants to cover opportunity costs.

(2). Quarterly Narrative Progress Report Burden

The RExO-Adult **quarterly narrative progress report burden** involves providing a detailed account of all activities undertaken during the quarter including in-depth information on accomplishments, promising approaches, progress toward performance outcomes, upcoming grant activities, and updates on product, curricula, and training development. It is assumed that each grantee will spend approximately two days (16 hours) per quarter preparing this report. Information to be included in this quarterly narrative report is laid out in the RExO-Adult Solicitation for Grant Application (SGA) and concomitant grant documents.

Narrative Report	Av Hrs. Per Year Per Grantee (4 responses x 16 hours each)	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Narrative Progress Report	64	38	2,432	\$10.75	\$26,144

(3). Quarterly Performance Report Burden ETA – 9140

The **quarterly performance report burden** assumes that all grantees use the ETA-provided MIS to generate quarterly performance reports (referred to as Management Information System (MIS) Reports in SGA/DFA PY-10-10). The MIS is designed to apply edit checks to participant data and to generate facsimiles of the aggregate information on enrollee characteristics, services provided, placements, outcomes, and follow-up status in quarterly report format. The burden includes reviewing and correcting errors identified by the MIS in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports.

ETA 9140 Report	Av Hrs Per Year Per Grantee (4 responses x 16 hours each)	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Dollars
Quarterly Performance Report	64	38	2432	\$10.75	\$26,144

TOTAL ANNUAL HOURS, Narrative and Quarterly Performance Reports & MIS system, 38 Grantees and 5700 participants: 15,124 total annual burden hours.

A.13 Estimated Cost to Respondents

- a) **Start-up/capital costs:** There are no start-up costs, as ETA provides grantees with a free, web-based, data collection and reporting system that grantees will use to collect and maintain participant data, apply edit checks to the data, and generate the quarterly reports.
- b) **Annual costs:** There are no annual costs, as ETA is responsible for the annual maintenance costs for the free, web-based, data collection and reporting system.

A.14 Estimates of Annualized Costs to Federal Government

The MIS system is fully developed and these costs have been absorbed. The annual costs of maintaining the system and developing training and technical assistance guides, continues to be estimated to be \$285,000, are borne by ETA.

A.15 Changes in Burden

The burden reduction is due to a decrease in grantees from 74 to 38. Also the BeneChoice information collection appended to this ICR in ROCIS is cancelled, along with ETA-9140A, because that grantee program concluded. Thus there is an added drop of 20 grantees and 80 annual hours. The added responses are due to an additional IC which acknowledges the individual participant burden for providing information for participant data records.

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

Grantees will submit narrative progress and MIS performance reports on a quarterly basis to ETA within 30 days of the end of each quarter. Quarterly report data will be analyzed by ETA staff and used to evaluate performance outcomes and program effectiveness.

Each year, ETA issues an annual report summarizing program performance based on the Secretary's goals. Data contained in the RExO-Adult reports may be included in these reports. The data will also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports. All reports are available on the internet and accessible to the public.

Product	Submission Date	Comments
Quarterly Narrative Progress Report	Within 45 days after the end of the quarter.	Quarterly progress reports and MIS data will be submitted electronically using ETA's On-Line Electronic Reporting System.
Quarterly Performance Report	Within 45 days after the end of the quarter.	

A.17 Approval Not to Display OMB Expiration Date

The expiration date for OMB approval will be displayed. We are not seeking approval to have this concealed.

A.18 Exceptions to OMB Form 83-I

No exceptions are requested in the "Certification of Paperwork Reduction Act Submissions."

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not contain statistical methods.