

SUPPORTING STATEMENT
(Employment and Training Administration Financial Report Form ETA-9130)
OMB CONTROL NO. 1205-0461

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The Employment and Training Administration (ETA) seeks approval of an extension with nonsubstantive changes. ETA has made minor changes to the reporting instructions only. The minor changes clarify the instructions previously approved by OMB on November 3, 2009.

ETA would also like to mention the recent approval of a nonsubstantive change for the Trade Adjustment Assistance Program (TAA), January 4, 2012. The change was required to allow ETA to be in compliance with the new trade legislation the enactment of the TAA Extension Act of 2011.

Financial reporting requirements for Federal programs are prescribed in OMB Circulars A-102 and A-110. U.S. DOL has codified these requirements at 29 CFR 95.52 and 29 CFR 97.41, which specify that forms approved by OMB are authorized for obtaining financial information from recipients.

ETA programs have varied administrative cost limitation requirements as specified in program statutes, regulations, and/or individual grant agreements. These requirements are met with a line item for Total Administrative Expenditures, thus providing a mechanism for assessing compliance with these requirements.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

ETA uses the data collected to assess the effectiveness of ETA programs and to monitor and analyze the financial activity of its grantees. Pre-designed software is provided to the grantees to reflect the requirements of ETA Form 9130 so that the required data is reported directly into the E-Grants Grantee Reporting System by the grant recipients.

This data collection format permits ETA to evaluate program effectiveness and to monitor and analyze financial activity, while complying with OMB efforts to streamline Federal financial reporting.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The focus of all ETA reporting has been to provide ease and simplicity for the grantees. At each point of data entry, the specific instruction relating to the required data element can be viewed by

the grantee. The timeliness of financial data has increased significantly with electronic financial reporting.

Financial reporting training is a continuing effort within the ETA community. This training provides a more consistent understanding of the required data elements, as well as ensuring an understanding of the electronic reporting process. Finally, detailed instructions for filling out the ETA-9130 financial report are available on-line at http://www.doleta.gov/grants/financial_reporting.cfm.

4. Describe efforts to identify duplication.

ETA grantees are using an OMB approved program-specific reporting format report on the ETA Form 9130, which is the only source for collecting required financial data from these grantees.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

This data collection does not impact significantly on small entities. Grantees must secure, however, the necessary data from all subrecipients to roll into grantee level required reporting formats.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Failure to collect this required financial data, and/or to collect it less frequently than quarterly, would be a distinct violation of OMB Circulars, ETA program statutes, regulations, and/or individual grant agreements, all of which set forth financial reporting requirements.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no known special circumstances relating to the above listing.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The public was given an opportunity for sixty days' comment on this proposed information collection. A Federal Register Notice was published May 29, 2012 (Vol. 77, p. 31642). No comments were received.

The Department has continuously consulted with Regional Offices, States and other DOL grant recipients to refine and simplify overall reporting strategy.

Training and technical assistance has been and will continue to be provided to grantee personnel who are, or in the future may be, involved in ETA financial reporting. (Response to item 3. above describes on-going training efforts.) Continuous communication in the forms of training and providing one-on-one technical assistance for grant recipients is part of ETA’s strategy to streamline and simplify all reporting efforts, while increasing the overall integrity of the reported data.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

There are no payments or gifts to respondents other than remuneration of contractors or grantees.

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

This collection of information does not include confidential information.

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.

There are no questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

Please see the reporting burden estimate below:

DOL-ETA REPORTING BURDEN FOR ENTITIES REPORTING ON ETA-9130 FINANCIAL STATUS REPORT			
	Annual		
	Program Year (PY)	Fiscal Year (FY)	TOTAL
Number of grantees reporting	848	848	848
Average number of reports per grantee per year	4	4	8
Average number of hours required for reporting per quarter per report	½ hr.	½ hr.	½ hr.
Average number of hours required for reporting per grantee per year	2 hr	2 hr	4 hr
Average number of hours required for reporting burden per year	1696	1696	3392

The above data represents average burden figures for all ETA programs reporting on the U.S.

DOL ETA Financial Report. Also included in the total are ETA programs that report both program year (PY) and fiscal year (FY) dollars simultaneously per quarter, as discussed in more detail below. Programs included in this compilation are: State Employment Security Agencies (SESAs) which are comprised of three components: Wagner Peyser Employment Service (ES), Unemployment Service (UI), and Trade Program Grant Agreements (TAs); as well as Workforce Investment Act Youth, Adult and Dislocated Worker; Hardmark Grants; Workforce Investment Act discretionary grants, H-I B Grants; and Performance Incentive Grants. Estimates also include provision for other miscellaneous grants which are yet to be funded, but which will report on the Financial Report.

ETA has approximately 848 active grantees. The number may increase or decrease from year to year due to funding for discretionary grant awards or other special circumstances. For example, the number increased under the ARRA with the award of additional grants and funds. However, ETA believes that 848 continues to represent an average number of grants per year. ETA’s annual figures must include a FY and PY breakout. ETA’s tracks funds based upon funding stream as appropriated and by fiscal year and program year. The 9130 reports for PY and FY are submitted simultaneously. All grantees submit 9130 reports for each stream of funds four times per year. The result is that ETA estimates a total of 8 reports per grantee per year.

ETA strives to reduce reporting time for our grantees. Several sections of the 9130 have pre-filled line items or automatically calculated line items, which is convenient and time saving for our grantees. It takes the grantees on average 30 minutes to fill out one 9130 report, which averages out to approximately two hours per year (4 reports per year at 30 minutes per report). ETA has always calculated the time per report at no more than 30 minutes and this was part of the initial package approved, as well as subsequent nonsubstantive renewals. There have been no changes to the form that would impact burden. During the initial and subsequent 60 day public comment periods, ETA has not received any comments from recipients suggesting this time is inconsistent with their actual burden. On average 3,392 hours is the estimated annual reporting burden. The calculation is based on 6,784 reports per year ((848 grant X 4 PY = 3392) + (848 grants X 4 FY = 3392) = 6784) at 30 minutes per report (6784/2=3,392). A GS 12/01 is the estimated level of staff required to perform this function. It is estimated that the annual hours are at a cost of approximately \$36.00 per hour for an annual cost of \$122,112. We have estimated the GS 12/01 level based on title/position of personnel submitting 9130 reports for our grantees. Many of our grantee personnel submitting the 9130 reports are accountants.

ESTIMATED ANNUAL ETA-9130 REPORTING BURDEN COST FOR GRANTEES						
Data Collection Activity	Number of Respondents	Frequency	Average Time Per Response	Burden Hours	Cost per hour	Estimated Annual Burden Cost for Grantees
Program Year	848	quarterly	1/2 hour	3392	36.00	\$122,112
Fiscal Year	848	quarterly	1/2 hour	3392	36.00	\$122,112
Total	848		2 hours	6784	36.00	\$244,224

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

There are no other costs.

14. Provide estimates of annualized cost to the Federal government.

ESTIMATED ANNUAL FEDERAL COST					
Estimated number Federal staff that review and certify reports	Average Federal Grade Level	Estimated number of hours per quarter to review and accept reports	Estimated number of hours per year to review and accept report	Hour wage rate for federal staff	Estimated Federal Cost Per Year
40	GS 13 Step 1	80	12,800	\$43.00	\$550,400

There are approximately 40 Federal staff as part of their duties as a Financial Analyst/Federal Project Officer (FPO) is to review and accept the ETA-9130 cost reports submitted by the grantees quarterly. The average Financial Analyst/FPO personnel is a GS-13 step 1, with an estimated annual salary of \$89,033 based on the FY 2010 Salary Table and an hourly wage rate of \$43.00. Based on ETA’s reporting instructions, it takes Fiscal/FPO staff approximately 80 hours (10 days x 8 hours per day = 80 hours) to review and accept the ETA-9130 reports quarterly. Annually, it takes approximately 12,800 hours to review and accept reports (80*4 quarters * 40 federal staff). At \$43.00 per hour, the estimated annual cost to the federal government is \$550,400.

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

The reduction in burden in the reginfo.gov database corrects the previous submission, which erroneously calculated the ETA-9130 burden at 1 hour per response rather than 30 minutes per response.

16. For collections whose results will be published, outline the plans for tabulation and publication.

The information collected will not be published.

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

The expiration date will be included on the forms associated with this ICR.

18. Explain each exception to the certification statement identified in Item 19 of the

OMB 83-I.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection does not employ statistical methods.