

**OMB 1205-0420 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 (DOL), Employment and Training Administration's (ETA) request for a three year extension with revision to the Workforce Investment Act (WIA) Management Information and Reporting System. The modifications will, among other things, make WIA performance reporting completely compatible with Workforce Investment Streamlined Performance Reporting (WISPR). This WIA reporting structure includes quarterly (ETA 9090) and annual (ETA 9091) reports as well as a standardized individual record file for program participants, called the Workforce Investment Act Standardized Record Data (WIASRD). The WIASRD is submitted by the states to ETA and includes participant level information on customer demographics, type of services received, and statutorily defined measures of outcomes.

The accuracy, reliability, and comparability of program reports submitted by states 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 DOL. The common performance measures are an integral part of ETA's performance accountability system, and ETA will continue to collect from grantees the data on program activities, participants, and outcomes that are necessary for program management and to convey full and accurate information on the performance of workforce programs to policymakers and stakeholders.

There are three sets of changes that are being requested in this renewal with revisions request. The first are changes to the WIASRD. The second are changes to the quarterly reports (ETA 9090) and the third are changes to the annual report (ETA 9091).

ETA is seeking to make two fundamental changes to the WIASRD. The first is to collect the information quarterly as opposed to annually. This quarterly collection has been approved under 1205-0474, however, ETA is seeking to consolidate that collection into this collection as it contains the annual WIASRD. The annual WIASRD is exactly the same as the 4th quarter WIASRD submission, and is, therefore, no longer required. This has been the procedure since 1205-0474 was approved in 2009. The second change to the WIASRD is the structure of the file. ETA proposes modifications to the WIASRD record layout so as to make it completely compatible with the Workforce Investment Streamlined Reporting System (WISPR). The modified WIASRD record layout will utilize the exact same variable definitions and data structures as WISPR rendering full scale WISPR implementation much more straightforward and less costly, should that occur at some point in the future. WISPR compatibility also has the advantage of capturing the veterans information necessary for reporting on priority of service for veterans, as well as, for monitoring the performance of the Gold Card Initiative, TAP services, and post 9/11 veterans served under WIA. ETA plans to either modify the Wagner-Peyser reporting system (the Labor Exchange Reporting System) to make it consistent with the WISPR layout or discontinue the LERS and integrate those reporting requirements into the WISPR system in the future.

ETA also proposed the addition of several items to the quarterly (ETA 9090) and annual reports (ETA 9091). A list of the items added to these aggregate reports is provided below. It should be noted here that the aggregate reports (both the quarterly and the annual reports) will be produced by ETA's Enterprise Data Reporting and Validation System (E-DRVS) beginning in Program Year 2012. This will reduce the burden on States as these entities will no longer be responsible for generating and submitting the reports to ETA. States will still have to certify the accuracy of the reports before they are transmitted to ETA, however, this process will be automated.

Currently ETA has a data validation requirement in place for two primary purposes. First, States use the DRVS software to ensure that annual and quarterly reports are computed correctly and consistently across all States. States use the DRVS software to produce the reports by uploading the individual records into the software. States have two options to do this. They can submit their calculations with a DRVS error rate associated with them or they can simply certify the DRVS results generated and use them for the annual and quarterly reports. Second, DRVS draws a sample and the underlying documentation is checked against what is reported in the pertinent individual record data to ensure that the underlying information is complete and accurate. The current data validation process is separate from the quarterly WIASRD record submission process. This renders it necessary for States to submit an equivalent individual record file multiple times; once for DRVS purposes and once for quarterly WIASRD purposes. If states utilize DRVS for quarterly reporting (not required but many States do this), they end up submitting the individual record files 8 times annually (twice per quarter). The E-DRVS will streamline these submissions by making the DRVS and WIASRD submission processes simultaneous rather than separate. For more information on data validation see the data validation reporting information collection request (OMB Control No. 1204-0448).

Additional 9091 report items:

- Table D. Adult program outcomes by service intensity (core, intensive, and training services).
- Table G. Dislocated Worker program outcomes by service intensity (core, intensive, and training services).
- Table H.1.A. Youth special populations' breakouts.
- Table P. Veterans priority of service (identical to that included in the latest 1205-0240 LERS PRA).
- Table Q. Veterans special populations' breakouts.

Additional 9090 report items:

- Veterans participant breakouts.
- Veterans entered employment, employment retention and six months average earnings outcomes breakouts.
- Credential attainment outcomes by program.
- Veterans priority of service information.

A.1 Circumstances Necessitating Data Collection

High quality program performance requires the submission of timely, accurate, and high quality data on the characteristics, services received, and outcomes of program participants. Together,

the 9090, 9090, and WIASRD comprise the data collected on WIA participants. As such, this data is necessary for tracking and reporting to stakeholders information on the usage, services provided, and performance of these programs. These data are used to monitor the core purpose of the programs – mainly, tracking how many people found jobs; did people stay employed; and what were their earnings.

ETA's statutory and regulatory authority to administer job training and employment programs includes provisions allowing for the requirement of performance reporting from states and grantees. WIA of 1998 (P.L. 105-220) includes provisions that require each state agency to furnish to the Secretary such information and reports and conduct such studies as the Secretary determines are necessary or appropriate for carrying out the purposes of the Act.

Information is collected through the WIA management information and reporting system under the following authority:

WIA section 136 establishes the performance and accountability requirements for WIA Adult, Dislocated Worker, and Youth programs. The purpose of section 136 is to establish a comprehensive performance accountability system, comprised of the activities described in this section, to assess the effectiveness of states and local areas in achieving continuous improvement of workforce investment activities funded under this subtitle, in order to optimize the return on investment of Federal funds in statewide and local workforce investment activities (section 136(a)).

Further, section 136(d) outlines the minimum requirements for the WIA annual reports that states must submit to DOL. The annual reports must reflect:

- The progress of the state in achieving state performance measures, including information on the levels of performance achieved by the state with respect to the core indicators of performance and the customer satisfaction indicator;
- The progress of local areas in the state in achieving local performance measures, including information on the levels of performance achieved by the areas with respect to the core indicators of performance and the customer satisfaction indicator;
- Information on the entry by participants who have completed training services provided under section 134(d)(4) into unsubsidized employment related to the training received;
- Data on the wages at entry into employment for participants in workforce investment activities who entered unsubsidized employment, including the rate of wage replacement for such participants who are dislocated workers;
- Information on the retention and earnings received in unsubsidized employment 12 months after entry into employment;
- A description of performance with respect to the indicators of performance specified in WIA section 136(b)(2)(A) (core indicators of performance) of participants in workforce investment activities who received the training services compared with the performance of participants in workforce investment activities who received only services other than the training services (excluding participants who received only self-service and informational activities); and
- A summary of performance with respect to the indicators of performance specified in WIA section 136(b)(2)(A) (core indicators of performance) of recipients of public

assistance, out-of-school youth, veterans, individuals with disabilities, displaced homemakers, and older individuals.

Sections 172, 185, and 189 provide broad authority to the Secretary of Labor to address performance and accountability issues for all programs authorized under title I. Section 136 specifically addresses performance and accountability for the WIA Adult, Dislocated Worker (DW), and Youth programs.

WIA section 172 directs the Secretary to provide for the continuing evaluation of programs and activities authorized under title I, including demonstration grants. WIA section 172(a) specifies that the evaluations must address:

- General effectiveness of such programs and activities in relation to their cost, including the extent to which the programs and activities improve the employment competencies of participants in comparison to comparably-situated individuals who did not participate in such programs and activities and, 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;
- Effectiveness of the performance measures relating to such programs and activities;
- Effectiveness of the structure and mechanisms for delivery of services through such programs and activities;
- Impact of the programs and activities on the community and participants involved;
- Impact of such programs and activities on related programs and activities;
- Extent to which such programs and activities meet the needs of various demographic groups; and
- Such other factors as may be appropriate.

WIA section 185 broadly addresses reports, recordkeeping, and investigations across programs authorized under title I of the Act. The provisions of section 185:

- Require the Secretary to ensure that all elements of the information required for reports be defined and reported uniformly (WIA section 185(d)(2));
- Direct each state, each Local Board, and each recipient (other than a sub-recipient, sub-grantee, or contractor of a recipient) to prescribe and maintain comparable management information systems, in accordance with the 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 (WIA section 185(c)(2));
- Require that recipients of funds under title I of WIA 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 title I of WIA (section 185(a)(2));
- Compel states to submit to the Secretary, on a quarterly basis, a summary of the reports submitted to the Governor under WIA sections 185(e)(1) and 185(e)(2);
- Specify that the reports shall include information about programs and activities carried out under title I of WIA pertaining to:

- Relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants;
- Programs and activities in which participants are enrolled, and the length of time that participants are engaged in such programs and activities;
- Outcomes of the programs and activities for participants, including the occupations of participants and placement for participants in nontraditional employment;
- Specified costs of the programs and activities; and
- Information necessary to prepare reports to comply with section 188 and 29 CFR Part 37 (section 185(d)(1) (a-e)).

WIA section 189 requires the Secretary to prepare and submit to Congress an annual report regarding the programs and activities carried out under title I of WIA. The report must include:

- A summary of the achievements, failures, and problems of the programs and activities in meeting the objectives of WIA title I;
- A summary of major findings from research, evaluations, pilot projects, and experiments conducted under WIA title I in the fiscal year prior to the submission of the report;
- Recommendations for modifications in the programs and activities based on analysis of such findings; and
- 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

States are expected to implement revised recordkeeping and reporting requirements with available funds. As such, the proposed revisions to the reporting requirements will better organize data that are already being collected and help standardize the measurement of performance by utilizing the existing WISPR format. At a minimum, information collected and reported through the WIA Annual Report Form 9091 (see Attachment C) and Quarterly Report Form 9090 (see Attachment D) will be used by local workforce investment areas, State Workforce Agencies, and Federal agencies 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 job training and employment programs;
3. To provide management information for use in Federal program administration and oversight, including grant-specific participation, service, and outcome summaries. Selected demographic information will also be used by grantees to demonstrate compliance with equal opportunity provisions in the law, and to prepare and maintain state management reports;
4. To administer incentives or sanctions for outcomes that exceed or fall short of negotiated levels of performance on the core measures;
5. Preparation and maintenance of consumer reports on eligible training providers; and
6. To measure compliance with the Government Performance and Results Act (GPRA) ;
7. To monitor the implementation of Veterans Priority of Service;

8. To monitor the Gold Card and Credential initiatives.

Under WIA section 136(d)(3), the Secretary is required to: (a) make the information contained in the annual reports available to the general public through publication and other appropriate methods, (b) disseminate state-by-state comparisons of information, and (c) provide the appropriate congressional committees with copies of such reports. In addition, information obtained through the WIA management information and reporting system will be used at the national level during budget and allocation hearings, for DOL compliance with the GPRA and other legislative requirements, and during legislative reauthorization proceedings.

A.3 Use of Technology to Reduce Burden

In order to comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of WIA participant data and the preparation of quarterly and annual performance reports to the extent feasible by providing uniform data elements and data definitions to states, and through the use of technology (for example by using E-DRVS and automated wage record systems). All WIA reports and records will be aggregated automatically and submitted to ETA via the Internet. However, it is left to the states and local areas to decide the best technology for collecting individual case management data given their unique circumstances and resource availability. The one exception to this policy is that states must collect all information that is required in WIASRD, at a minimum. However, states may add additional items to the data sets but cannot submit that information in WIASRD.

The utilization of E-DRVS to import WIASRD-formatted records, check for data errors and out of parameter records, and produce the WIA annual and quarterly reports in both printable and electronic data transfer formats, as well as, the utilization of UI wage records as the primary source of data on wages and employment-related outcomes will result in decreased burden hours for many states who administer WIA programs. ETA will continue to work with the states to streamline E-DRVS and to access and exchange Unemployment Insurance (UI) wage records among the states.

A.4 Efforts to Identify Duplication

A hallmark of WIA is increased accountability in exchange for optimal flexibility. Two ways in which the WIA has strengthened accountability over the Job Training Partnership Act (JTPA) is by requiring more comprehensive performance standards and by establishing quarterly and annual reports. Additional data items are needed on the individual WIASRD records to support the measures, and much of these data will be used by states to prepare the quarterly and annual performance 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. A very limited number of items are required for those accessing only core services. More items are expected for those receiving intensive and/or training services given the service intensity and resources expended. Data items beyond those collected by existing program reports and individual records are needed to: (1) account for the detailed services provided by multiple agencies to help participants get and keep good paying jobs; (2) better identify overlapping and unproductive

duplication of services; (3) generate comparable performance information across ETA-funded programs; (4) generate statistics on self and core services, which have not been measured before; (5) collect participant data that are not exclusive to those who leave ETA programs; and (6) readily identify and make program changes needed to reduce fraud, waste, and abuse. Information provided through the WIA Management Information and Reporting System is not available through other data collection and reporting systems.

A.5 Methods to Minimize Burden on Small Businesses

The involvement of small businesses or other small entities for reporting purposes is extremely limited. In fact, the only time contacting them may be required is during the provision of a service or through the collection of customer satisfaction data. The survey questionnaire contains only three required Federal questions (though states may choose to add other items for their own purposes). The survey methodology uses a nationally recognized system employed in both the public and private sectors. States serving many customers may take advantage of a sampling method rather than contacting each business.

A.6 Consequences of Less Frequent Data Collection

The Workforce Investment Act is very specific about reporting requirements and reporting frequency. If DOL did not comply with these requirements, funding for WIA programs would be compromised.

The Final Rule at 20 CFR 667.300(d) (65F.R. 49429 August 11, 2000), which governs the due date, states:

Financial reports and participant data reports are due no later than 45 days after the end of each quarter unless otherwise specified in reporting instructions. A final financial report is required 90 days after the expiration of a funding period or the termination of grant support.

Section 667.300(e)(1) contains the sanctions for failure to file timely annual reports:

A State failing to submit any of these annual performance progress reports within 45 days of the due date may have its grant (for that program or all title I, subpart B programs) for the succeeding year reduced by as much as 5 percent, as provided by WIA section 136(g) (1)(B).

Section 667.300(e)(2) continues with:

States submitting annual performance progress reports that cannot be validated or verified as accurately counting and reporting activities in accordance with the reporting instructions, may be treated as failing to submit annual reports, and be subject to sanction. Sanctions related to state performance or failure to submit these reports timely cannot result in a total grant reduction of more than five percent. Any sanction would be in addition to having to repay the amount of any incentive funds granted based on the invalid report.

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

A Pre-clearance Notice was published in the Federal Register on September 26, 2012 (Vol. 77, p 59224 et seq). Comments were received from two States.

Public Comment Summaries	ETA Response
<p>One State commented that ETA took important steps to ensure toward integrated reporting with its modifications to Trade and Workforce Investment Act reporting Systems, including the current collection. Texas strongly supports these efforts and proposed that ETA make a number of additional modifications to the proposed changes published in the above federal registry notice.</p>	<p>ETA agreed with the State’s suggested modifications and has incorporated all of them into the revised WIASRD record layout. Making the proposed changes will facilitate the future implementation of WISPR by aligning the reporting requirements across the pertinent workforce programs.</p>
<p>One State commented that the proposed continued collection of proper performance currently has practical utility. The State commented that it looks forward to reducing the burden of annual WIA reporting through elimination of the annual WIASRD. The State also welcomed the automated technology for file submission and report generation and commented that preparing for states partially for conversion to WISPR would benefit states. However, the State commented that DOL has underestimated the agency’s burden at zero. The State commented that its MIS system must be updated to report multiple programs in one combined report such as WISPR. In order for the states to estimate an accurate burden cost, data specifications for the new WIASRD file will be needed.</p>	<p>The current data collection package deals only with the costs associated with modifying the WIASRD record layout to make it compatible with the WISPR individual record layout. So while WISPR implementation would impose unfunded costs on the State with respect to modifying its MIS to report on an integrated cross-program basis, the current data collection request only pertains to modifications to the WIA performance reporting system. As a result, the integration costs the State commented about, do not apply because the current collection is not proposing cross program integration. Since States have the necessary technology and data collection mechanisms in place to meet the proposed WIA reporting requirements (including the modifications), ETA is not reporting any start-up/capital costs as part of this collection request. The costs to maintain and disclose WIA performance data are covered by the State’s existing grant funds.</p>

A.9 Payment of Gifts to Respondents

There is no payment to respondents other than the formula funds and incentive funds provided

for in the WIA.

A.10 Confidentiality Assurances

ETA is responsible for keeping private the WIA performance data and will maintain 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. WIA performance data will not contain any individually identifying information. States will submit records on individuals but they will submit them using an individual identifier that must not be the individual's social security number. ETA's data systems will not accept identifiers that look like they could be SSNs, providing an extra check on the unique identifiers. Furthermore, ETA randomly scrambles the unique identifiers, changes the birth date field to a discrete age data field, and delimits all records coming from local areas containing less than 50 records when producing the publicly available WIASRD.

A.11 Additional Justification for Sensitive Questions

There are no sensitive questions included in the proposed data collection. Individual records, which contain wage record information, must be submitted using a unique personal identifier rather than a Social Security Number.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the WIA reporting system has the following four components: (1) the WIASRD participant record burden; (2) the quarterly summary report burden; (3) the annual summary report burden; and (4) the customer satisfaction burden. This response provides a separate burden for each of the components.

(1). WIASRD Participant Record Burden

The WIASRD burden considers the amount of information collected and reported on the WIASRD that would not have to be collected by the states as part of their customary and usual burden to run the program. Thus, the burden reflects the information collected solely to comply with the WIASRD federal reporting requirements. The WIASRD estimate also does not include the burden associated with collecting and reporting information required to meet Equal Employment Opportunity requirements, which is covered under a separate burden estimate.

The WIASRD burden varies by participant based on the intensity of services provided and the number of WIASRD elements applicable to the participant. For example, considerably more information is reported on WIA youth than WIA adults and collecting the youth literacy, numeracy, and skill attainment elements is more burdensome than collecting other types of data elements. On the other hand, web-based registrations, the use of wage records for measuring outcomes, the use of E-DRVS to generate that 9090 and 9091, and the consolidation of the WIASRD and DRVS uploads into one upload in E-DRVS help to minimize the burden of data collection. For detailed information on the burden estimates associated with data validation, see the data validation PRA information collection request (OMB Control No. 1205-0448).

The WIASRD data collection burden calculation uses a minutes per record estimate. The minutes per record estimate is derived from the count of WIASRD data elements that are required for the record type, as well as the relative burden of collecting that data. For example, as mentioned above, it is relatively time consuming to collect each WIA youth literacy, numeracy, and skill attainment element, and there are significantly more data elements that must be collected for WIA youth than for WIA adults. Therefore, youth records have relatively higher minutes per record estimates. The minutes per record estimates are based on the WISPR data collection (OMB control number 1205-0469). Since the current revisions to the WIASRD record layout render the layout identical to that used in WISPR (so as to make the future transition to WISPR more efficient), these minutes per record estimates are directly applicable to this calculation.

The currently approved Annual WIASRD data collection (OMB Control Number 1205-0420, expires December 31, 2012) estimate is 604,982 hours, based on PY 2002 exiter counts. The current Quarterly WIASRD data collection (OMB Control Number 1205-0474) estimate is 573,160 additional hours, based on PY 2007 annual national participant and exiter counts; the most recent available data at the time that data collection request was developed. This renewal with revisions request removes the Annual WIASRD burden from this package and replaces it with the Quarterly WIASRD burden (from OMB Control No. 1205-0474) as the Annual submission is now simply the 4th quarter Quarterly WIASRD submission.

The new burden estimate calculations below reflect the use of the previously approved WISPR minutes per record estimates (since the proposed revised WIASRD uses the WISPR record layout) and the removal of the Annual WIASRD burden associated with this collection. The new annual burden hours represent the total annual burden associated with all four quarterly submissions using the new E-DRVS and minutes per record estimates associated with WISPR. The total annual burden hour estimates were obtained by multiplying the number of PY 2010 WIASRD records by program and the minutes per record burden estimates associated with each record. The annual national burden hour estimates include the burden for each quarterly submission.

Record Type	Minutes Per Job Seeker Record	PY 10 Annual National Counts	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Adult, DW, National Emergency Grant Exiters	17.7	1,262,573	372,459	\$41.80	\$15,568,788
Youth Exiters	54.3	129,505	117,202	\$41.80	\$4,899,045
Total		1,392,078	489,661		\$20,467,832

Hourly rates used to calculate cost depend upon the type of organization administering the program. For state-run programs, the hourly rate is the average hourly earnings for employees in state UI agencies in FY 2011 (as used for FY 2011 UI budget formulation purposes).

The annual burden estimates equate to an average of 9,238.9 hours per state per year at an average cost of \$386,185.5 per state per year.

(2) and (3). Quarterly and Annual Report Burden

The WIA **quarterly and annual report burden** includes data formatting, uploading the quarterly WIASRD files to E-DRVS (i.e. the edit checks), as well as certifying the quarterly and annual reports before their transmission to ETA. States must still certify the accuracy of the reports before they are transmitted to and accepted by ETA.

The previous data collection estimated 640 hours per year per state for the Quarterly reports and 400 hours per year per state for the Annual reports. These estimates were based on the state formatting the data and calculating all of the aggregate items in house. The current burden estimates include only the time it takes to pass the edit checks and to confirm the accuracy of the data as the calculations and construction of the reports will be performed automatically for the states via the E-DRVS. As a result, the current data collection estimates that it takes one staff person a full weeks work (40 hours) each quarter to upload the data (including passing the edit checks) and certify its accuracy. The annual reports are estimated to take double that amount of time as the ETA 9091 contains substantially more information to verify in the certification step. E-DRVS calculates all the report items and transmits the completed reports to ETA automatically.

Program	Hrs. Per Year Per State	Number of Reporting States	Annual National Hours	Applicable Hourly Rate	Annual National Quarterly Report Burden Dollars
Quarterly Report	120	53	6,360	\$41.80	\$265,848
Annual Report	80	53	4,240	\$41.80	\$177,232
Total	200	53	10,600	\$41.80	\$443,080

(4). Customer Satisfaction Survey Burden

The **customer satisfaction survey burden** considers the WIA’s [WIA Section 136(b)(2)(B)] requirement that states measure satisfaction for employers and participants (job seekers) of state and local agencies that provide employment and training activities. The only changes in customer satisfaction burden associated with the current renewal request and that last approval concerns the number of states reporting on customer satisfaction in the WIA annual reports. Under the existing collection, 22 states did not have waivers for customer satisfaction. However, 44 states currently have this waiver.

ETA has required that states use a standard measurement tool so that scores can be compared among states. Additionally, WIA Section 136(b)(3)(A)(I) requires state-adjusted levels of customer satisfaction performance that shall at a minimum:

- be expressed in an objective, quantifiable, and measurable form; and,
- show the progress of the state toward continuously improving performance.

Customer satisfaction surveys are conducted quarterly and reported electronically to ETA each year on the WIA Annual Report (Form 9090, OMB Control No. 1205-0420). Although the statute requires states to measure satisfaction, 44 states have approved waivers to report on common performance measure outcomes only. These common measures focus on entered employment, retention, and earnings for adults and dislocated workers, and employment/education placement, degree/certificate attainment, and literacy/numeracy gains for youth. Therefore these states do not report to ETA on customer satisfaction. The remaining nine states still report on customer satisfaction; however, this measure is reported only in the state’s WIA Annual Report and the results are not considered in determination of eligibility for WIA incentive grants or sanctions for poor performance.

The following assumptions are used:

Respondents – 750 hours (9 states * 1000 responses * 5 minutes per survey)
 Estimate based on 1,000 responses per reporting unit (500 WIA participants and 500 employers) and 5 minutes (1/12 hr.) per survey. This assumes the three American

Customer Satisfaction Index (ACSI) questions are asked. States may incur increased costs in the event additional questions are asked on the surveys.

Survey Administration – 6,150 hours (9 states * 1000 responses * 41 minutes per survey)
 Estimate based on 41 minutes to obtain a completed survey (telephone contacts, call-backs, data entry). This estimate assumes 50 percent of the respondents for each state will take an average of 30 minutes each, 25 percent will require an average of 45 minutes, and 25 percent will require an average of 60 minutes to obtain each completed survey.

Survey Preparation and Overhead – 1,386 hours (9 states * 154hrs/state)
 Estimate based on:

- Survey development* (preparation of questionnaire and telephone script for interviewer) - 40 hours per reporting unit
- Sample selection* - 24 hours per reporting unit
- Survey set-up* (setting up survey for telephone administration and creation of a database) - 40 hours per reporting unit
- Compilation of results* (includes generation of descriptive statistics and calculation of index for participants and employers) - 50 hours per reporting unit

Survey Task	Number of States ¹	Hours Per State Per Task/Yr	Total National Burden Hours/Yr	Applicable Hourly Rate	Total National Burden \$/Yr
Respondents	9	83.3	750	\$41.80	\$31,350
Survey Administration	9	688	6,192	\$41.80	\$258,825
Survey Prep and Overhead	9	154	1,386	\$41.80	\$57,935
Total	9	925.3	8,328	\$41.80	\$348,110

¹ = 44 states have approved waivers and do not conduct the customer satisfaction survey

A.13 Estimated Cost to Respondents

States have the necessary technology and data collection mechanisms in place to meet these reporting requirements. Therefore, the ETA is not reporting any start-up/capital costs or annual operating costs as a part of this information collection request. The costs to maintain and disclose these data are covered by states’ existing grant funds.

A.14 Estimates of Annualized Costs to Federal Government

The annual costs of maintaining the Enterprise Business Support System database, maintaining the quarterly reporting software, and developing technical assistance guides are borne by ETA and are estimated to be \$483,334. This represents the same Federal government burden hours previously assumed for WIA, adjusted based on a higher state hourly wage rate of \$41.80.

Since the ACSI customer satisfaction survey is proprietary property ACSI LLC, ETA has established a license agreement with ACSI LLC that will allow states the use of the ACSI for a statewide sample of participants and employers. This costs approximately \$120,000 per year. States that want to use the ACSI for measuring customer satisfaction for each local area or for additional assistance in measuring, analyzing, and understanding ACSI data establish independent contracts with the University of Michigan.

Total annual costs to the Federal government are thus estimated to be \$603,334.

A.15 Changes in Burden

There are large changes in the burden estimates between the current renewal request and the existing WIA collection. The existing collection had an estimate of 709,145 total burden hours while the renewal request estimates the total burden to be 508,589 hours.

There are a variety of reasons for the reduced burden estimate. First, the revised WIASRD mirrors the WISPR individual record layout and so relies on the previously approved minutes per record estimates associated with the WISPR individual record layout (OMB Control Number 1205-0469). Second, the production of the quarterly and annual reports (ETA 9090 and ETA 9091) has been streamlined significantly through the use of E-DRVS (this system will be implemented in the first quarter of PY 2012). In addition, 44 states now have approved waivers for the customer satisfaction reporting requirements in the annual reports. This reduces the total customer satisfaction burden. Lastly, since the annual WIASRD is no longer required (as it was subsumed by the 4 quarter WIASRD), reducing the burden.

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

Product	Submission Date	Publishing Date
Individual Records	1 st quarter – November 15, annually. 2 nd quarter – February 15, annually. 3 rd quarter – May 15, annually. 4 th quarter – September 15, annually.	States submit WIASRD records (minus individual identifiers) through ETA’s web-based reporting system (E-DRVS).
Quarterly Summary Report (ETA 9090)	Within 45 days following the end of the quarter.	Although the department will use this information to prepare GPRA, budget and ad hoc reports, it does not plan to publish the information separately.
Annual Report (ETA 9091)	October 1, annually.	DOL publishes WIA Annual Report data on a website during the Fall after the October submission date.

Customer Satisfaction Survey	Results of the survey will be submitted in the annual reports (States without a common measures waiver).	Included in the WIA Annual Report published on the website during the Fall after the October submission date.
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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.”