

**OMB CONTROL NO. 1205-0392: TRADE ADJUSTMENT ASSISTANCE:
SUPPORTING STATEMENT FOR REQUEST FOR OMB EXTENSION UNDER THE
PAPERWORK REDUCTION ACT OF 1995**

A. JUSTIFICATION

A.1 Circumstances Necessitating Data Collection

This is a justification for the Department of Labor, Employment and Training Administration's (ETA's) request for approval to extend, with minor revisions, the existing reporting and recordkeeping requirements for the Trade Adjustment Assistance (TAA) program, a single integrated collection format that meets all reporting requirements listed in amendments to the Trade Act of 1974 (19 USC 2311) through the Trade Assistance Extension Act of 2011 (TAAEA), which is part of the American Recovery and Reinvestment Act (ARRA). Broad authority to collect data from states regarding activity for TAA is also found in 20 CFR 617.57 and 617.61.

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

States and grantees carry out the TAPR reporting requirements. The TAPR Data Preparation and Reporting Handbook that includes an appendix that contains the quarterly reporting formats and instructions as well as a full listing of the individual data elements to be collected in the Trade Act Participant Report (TAPR). At a minimum, information collected and reported through the quarterly reports and records is used by state and local workforce investment areas and Federal agencies for the following purposes:

1. To provide annualized TAA program and performance information to the Committee on Finance of the Senate and the Committee on Ways and Means of the House of Representatives;
2. To make TAA benefit, services and performance information available to the public through a searchable format available through the TAA website administered by USDOL.
3. To continuously improve the quality, effectiveness, and efficiency of job training and employment-based programs to job seeker and employer customers;
4. To provide management information for use in Federal program administration and oversight, including grant-specific participation, service, and outcome summaries. Selected demographic information is used by grantees to demonstrate compliance with equal opportunity provisions in the law, and to prepare and maintain state management reports;
5. To measure compliance with the Government Performance and Results Act (GPRA)

A.3 Use of Technology to Reduce Burden

In order to comply with the Government Paperwork Elimination Act, the collection of program participant data and performance reports is based on uniform data elements and data definitions provided to states electronically. All TAPR reports are submitted to ETA via the Internet. Although states and local areas decide on the best technology for collecting individual case

management data, given their unique circumstances and resource availability, states collect, retain, and report all information electronically.

The use 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 TAA programs. ETA will continue to work with the states to access and exchange UI wage records among the states. ETA is also planning to upgrade existing reporting software for states that will import participant data, check for data errors and out of parameter records, and produce the TAPR in both printable and electronic data transfer formats.

A.4 Efforts to Identify Duplication

The TAPR is the only report on TAA participants that requires data on individual participants. Except where individuals are registered in other programs and outcomes are reported for them under those programs, there is no duplication of data. Where participants are reported on under other programs, for example the Workforce Investment Act (WIA) dislocated worker program, standardized data elements such as demographic information, services, and common outcome measures may be easily copied and transferred for use in the TAPR.

A.5 Methods to Minimize Burden on Small Businesses

No small businesses or entities are impacted.

A.6 Consequences of Less Frequent Data Collection

States and grantees are required to submit TAPR records to ETA electronically, and to upload aggregate performance outcome information into ETA's Enterprise Business Support System (EBSS) on a quarterly basis as required by statute. If states do not comply with these requirements, the funding for these programs would be compromised to the detriment of the individuals that benefit from services provided through these programs. ETA's responsibility for reporting, oversight, and monitoring will be severely hampered because there is no other vehicle for judging program performance and participant outcomes for TAA. The agency will also be unable to fulfill its reporting responsibilities mandated by TGAAA and under GPRA.

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

Telephone conferences and live presentations with stakeholders have been conducted by the agency to ensure smooth submission of TAPR data. A Pre-clearance Notice was published in the Federal Register on January 15, 2013 (Vol. 78, p 3029 *et seq.*). No comments were received.

A.9 Payment of Gifts to Respondents

There are no payments to respondents other than the formula funds and incentive funds provided for in the authorizing statutes.

A.10 Confidentiality Assurances

ETA is responsible for keeping the TAPR data private and maintains the data in accordance with all applicable Federal laws, with particular emphasis upon compliance with the provisions of the Privacy and Freedom of Information Acts. TAPR data does not contain any individually identifying information. States submit records on individuals, but they submit them under an individual identifier, which must not include the individual’s social security number.

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, may be submitted using a unique personal identifier or pseudo-social security number.

A.12 Estimates of the Burden of Data Collection

The burden for preparing the TAPR submission assumes that each of the 50 states will prepare a quarterly TAPR submission, for a total of 200 reports per year. (It is possible that one or more state agencies will have no terminees during a quarter and therefore will not be required to submit a report.)

The annual national burden for states for TAA reporting is comprised of two parts: 1) the burden of collecting participant data, and 2) the burden of preparing the TAPR submission.

DATA COLLECTION BURDEN

TAA Staff Burden	Hrs. Per TAPR Record	Total Annual Participant Record Estimate	Annual TAPR Burden Hours (.02*450,000)	Hrs. per TAPR Submission (9,000/50states/4 submissions per year)	Applicable Hourly Rate	Annual TAPR Burden Salary Equivalent (9000*\$39.17)
TAPR Submission	.01	450,000	9000	45	\$39.17	\$352,530

TAA Participant Burden	Hrs. Per TAPR Record	Total Annual Participant Record Estimate	Annual participant Burden Hours (.02*450,000)	NA	Applicable Hourly Rate: Minimum Wage	Annual Participant Burden Salary Equivalent (9000*\$7.50)
TAPR Submission	.01	450,000	9000		\$7.50	\$67,500

DATA REPORTING BURDEN

TAA Burden	Hrs. Per TAPR Submission	States Submitting Per Quarter	Annual TAPR Burden Hours (2.5*50 states*4 submission per year)	Applicable Hourly Rate	Annual TAPR Burden Salary Equivalent (500*\$39.17)
TAPR Submission	2.5	50	500	\$39.17	\$19,585

Combining the burden estimates for collecting and reporting 1205-0392 results in the estimates represented in the table below:

TOTAL BURDEN SUMMARY

Annual Hour Burden	18,500
Burden Hour Salary Equivalent	\$439,615

A.13 Estimated Cost to Respondents

19 USC 2285 stipulates that a portion of administrative funds distributed to states should be used to address necessary reporting system upgrades needed to accommodate new statutory provisions under the Trade Act of 1974, as amended by TGAAA. Therefore there is no cost to respondents.

A.14 Estimates of Annualized Costs to Federal Government

ETA collects and stores the data in house. The cost to the Federal government is minimal. It is estimated that staff spend 5 hours per quarter monitoring the data and providing technical assistance for a total of 20 hours per year. Using an average hourly staff rate of \$32.50, the estimated annual cost to the Federal government is \$650.00.

A.15 Changes in Burden

Minor technological changes to the current Trade Activity Participant Report (TAPR) are requested. The first change would consist of renumbering some of the data elements in order to align with the latest WISPR report format. This renumbering does not affect the manner in which data is submitted, so the change is *de minimus*. The second change would allow states to update data for an entire year through their most recent TAPR submission rather than 3 quarters of a year. This would require information for each individual record to be reported 10 quarters after exit (rather than 9 quarters after exit as is required currently). States are merely repeating the reporting of original data in a manner that will allow for corrections to be noted in annual calculations representing four full quarters of data. Repeating information for each individual record for 10 quarters after exit (rather than 9 quarters after exit as is required currently) does not represent new data, since the data is static at 6 quarters after exit. Instead, states are merely repeating the reporting of original data in a manner that will allow for corrections to be noted in annual calculations representing four full quarters of data. Consequently, there are no changes in burden under this element.

The Department has reconsidered whether this collection imposes any burden on participants, and concluded that it may; consequently, in order to ensure that all burden is counted, this ICR includes a new collection for the burden that may be imposed on individuals or households to respond to State Agency information collections caused by the TAPR report. The time burden on individual participants would mirror the burden States encounter in recording the information. This methodology reconsideration results in a burden adjustment increase of 9000 hours.

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

States submit the TAPR reports on a quarterly basis to DOL within 45 days after the end of each program year quarter. Reports are due on the following dates:

Report Quarter		Due Date
1st Quarter FY	October to December	February 14
2nd Quarter FY	January to March	May 15
3rd Quarter FY	April to June	August 14
4th Quarter FY	July to September	November 14

Quarterly report data are analyzed by ETA and VETS staff. Data analysis is used to identify strategies for continuous improvement and areas where additional federal guidance is needed. DOL uses these data to prepare GPRA reports, management and budget reports, Office of Management and Budget’s (OMB) Program Assessment Tool (PART), and other ad hoc reports.

Each year, the Department issues an annual report summarizing program performance against the Secretary’s goals. Some of the data included in the Department’s annual report are generated from the TAPR reports. Additionally, ETA prepares an annual report for TAA based on the data collected through the TAPR. To satisfy its requirements under Title 38, the Veterans’ Employment and Training Service (VETS) publishes an annual report that focuses on services delivered by DVOP and LVER staff. The Department’s annual report, ETA’s TAA annual report, and VETS annual report are submitted to Congress. All reports are available on the Internet and accessible to the general public and interested stakeholders.

A.17 Approval Not to Display OMB Expiration Date

The expiration date for OMB approval is displayed.

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.