

**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 for approval to implement reporting and recordkeeping requirements for youthful offender grants funded under the Reintegration of Offenders Appropriation. This reporting structure features standardized data collection for quarterly Management Information System (MIS) report formats.

The quarterly MIS provide aggregate information on demographic characteristics of participants in the youth offender projects, types of services received, placements in education and employment, outcomes, and follow-up status.

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.

**A.1 Circumstances Necessitating Data Collection**

Since 2000, the Department of Labor has funded a variety of offender-focused employment and training grants that target both adult and youthful offenders. Beginning with the 2005 Prisoner Reentry Initiative, an adult-focused grant Web-based case management and reporting system (MIS) was developed to support real-time data management and performance reporting. This system does not support youth offender grants, with their separate common performance measures and distinct eligibility criteria. Because youth offender projects have been consistently funded for the past 13 appropriation cycles, it is time to develop a MIS for the youth offender projects in order to better track real-time data and performance outcomes for this important target population.

In 2003, ETA first began collecting data from youthful offender grantees on participant characteristics, services provided, and participant outcomes using Excel spreadsheets. The data has been used by ETA to monitor and improve grantee performance and to provide quarterly reports to Congress that also are available to the public. The data also has been used by grantees to monitor their own progress. This reporting was done without OMB approval. ETA is now seeking to rectify this oversight and is requesting OMB approval to collect this data through a new reporting and record-keeping system for youthful offender grantees similar to those currently in place for ETA's adult offender and YouthBuild grantees.

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 [section 185(d)(2)]
- direct each state, local board, and 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 [section 185(c)(2)]
- require that recipients of funds under Title I 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 [section 185(a)(2)]
- require that recipients of funds under Title I 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 [section 185(a)(3)]
- specify that the reports shall include information about programs and activities carried out under Title I 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
  - information necessary to prepare reports to comply with section 188 and 29 CFR Part 37.37 [(a-b), (d-e)].
- require that all elements of the information required for the reports described in section 185(d)(1)(A-E) above are defined and uniformly reported.

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

- a summary of the achievements, failures and problems of the programs and activities in meeting the objectives of Title I
- a summary of major findings from research, evaluations, pilot projects, and experiments conducted under 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
- 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**

ETA will be collecting the same general information under this request as we have been collecting on demographic characteristics, services received, and outcomes of participants in youthful offender projects funded by DOL. The main difference is that under this request we will be providing grantees with Web-based access to collect baseline information on participants and to track their activities and outcomes in the program. Another difference is that under this request we will begin collecting post-program data on outcomes.

Within ETA, the data are used by the Offices of Workforce Investment, Financial and Administrative Services, Policy Development and Research, and Regional Management (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 will continue to be 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 will continue to be 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**

To comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of participant data and the preparation of quarterly reports to the extent feasible by providing a Web-based MIS/Case Management System and by providing uniform data elements and data definitions to grantees across ETA programs. All ETJD data and reports will be submitted to ETA via the Internet. Grantees will collect, retain, and report all information electronically through the record-keeping system provided by ETA.

## **A.4 Efforts to Identify Duplication**

ETA minimized the reporting burden by limiting as much as possible the number of required data elements. Data items collected by program reports and individual records are needed to account for the detailed services provided by grantees. Information provided through this management information and reporting system is not available through other data collection and report systems.

## **A.5 Methods to Minimize Burden on Small Businesses**

There are no small businesses that will be required to report directly under this data collection request. The only time contacting them may be required is to verify employment or retention of participants employed by them.

## **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 45 days after the reporting period. If ETA did not comply with these requirements, the monitoring of these demonstration projects would be compromised.

## **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 April 11, 2013 (Vol. 78, p 21630). No comments were received.

## **A.9 Payment of Gifts to Respondents**

There are no payments to respondents other than the grant funds that they receive.

## **A.10 Confidentiality Assurances**

ETA is responsible for keeping private the youth offender participant and performance data and will maintain the data in accordance with all applicable Federal laws, with particular emphasis on compliance with the provisions of the Privacy and Freedom of Information Acts. Given the emphasis placed in the juvenile justice system on keeping data private on juvenile offenders, the Department is working diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted. All contractors that have access to individually identifying information are required to provide assurances that they will respect and protect the privacy of the data. ETA's Office of Information Systems and Technology (OIST) is an active participant in the development and approval of data security measures – especially as they apply to this Web-based system. Social Security numbers will not be used in this system. 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**

The only sensitive data that grantees will be collecting on participants relates to involvement in the juvenile or adult criminal justice system, and even in regards to this, we will encourage grantees to collect this information as far as possible from the juvenile justice system rather than asking participants for this information. The collection of information on juvenile or adult criminal system involvement is necessary given that the funding for this set of grants comes from an appropriation expressly devoted to serving youthful offenders and youth at-risk of offending.

## A.12 Estimates of the Burden of Data Collection

The annual national burden for Youthful Offender reporting has three components: (1) the participant data collection burden; (2) the quarterly narrative report burden; and (3) the burden of collecting recidivism information. ETA has been collecting participant data, quarterly narrative reports, and recidivism reports, and this response provides a separate burden for each of these three components. The Department expects over the next few years to award 28 new Youthful Offender grants each year for two years of operation and up to one year of follow-up services and post-placement data collection. In any given year, this will result in 28 grants in their first year of operation, 28 grants in their second year of operation, and 28 grants providing follow-up services and tracking post-placement outcomes, for a total of 84 grants collecting data each year.

### (1). Participant Data Collection Burden

The Youthful Offender **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 by grantees and the information provided by enrollees solely to comply with the federal reporting requirements. Youth offender grantees will have some additional burden to set up systems for tracking the participation of enrollees in program activities and for tracking the program outcomes of enrollees, but these tracking systems can be considered as data necessary to run the program. The data collection burden will vary by participant based on the range and intensity of services provided by the grantee as well as by the number of participants served.

Record Type	Hrs. Per Record	PY 13 Estimated National Count of Participants	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Participant, burden on grantee staff for collection	1.6	12,000	19,200	\$14.61	\$280,512

Record Type	Hrs. Per Record	PY 13 Estimated National Count of Participants	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Participant, burden on enrollee for information to intake person	.2	12,000	2,400	\$7.25 federal minimum wage rate	\$17,400

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 2010, Current Employment Statistics

Survey, U.S. Census Bureau). For enrollees, the federal minimum wage is used to approximate opportunity costs.

(2). Quarterly Narrative Report Burden

The **quarterly narrative report burden** considers the time it will take the staff of grantees to prepare quarterly summaries of progress to date, challenges and concerns, items to be resolved, partnerships with other local agencies, success stories, and plans for the next quarter.

Report	Hrs. Per Report	Number of Reports (84 grantees x 4 quarters)	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Quarterly Narrative Report	30	336	10,080	\$14.61	\$147,269

(3) Recidivism Report Burden

The Recidivism Report Burden considers the time it will take juvenile justice system staff to review individual juvenile justice records to determine which participants have been convicted of a new offense within 12 months of their release from a correctional facility or being placed on probation. This information will continue to be collected once a year, and will only require determining the recidivism of the subset of participants who reached the 12-month point since being released from a correctional facility or being placed on probation.

Record Type	Hrs. Per Record	PY 12 Estimated National Count	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Recidivism Report	.5	12,000 by 84 juvenile justice agencies = 142.86 per juvenile justice agency	6,000	\$14.61	\$87,660

## SUMMARY

<b>Form/Activity</b>	<b>Total Annual Burden/Hours</b>	<b>Total Respondents</b>	<b>Average Annual Hours per Response</b>	<b>Total Annual Responses</b>
Grantees' Participant Data Collection	19,200	84 grantees	1.6	12,000
Participant Data Disclosure	2,400	12,000 participants	0.2	12,000
Grantees' Quarterly Narrative Report	10,080	84 grantees	120	84
Juvenile Justice Agencies' Recidivism Report	6,000	84 juvenile justice agencies	71	12,000
<b>Total</b>	<b>37,680</b>	<b>12,168*</b>	<b>NA</b>	<b>36,084</b>

Monetized Burden Hours Total: \$532,841.

\* Unduplicated

### **A.13 Estimated Cost to Respondents**

**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 use to collect and maintain participant data, apply edit checks to the data, and generate the quarterly reports. **Annual costs:** There are no annual costs, as ETA covers the annual maintenance costs for the free, web-based, data collection and reporting system.

### **A.14 Estimates of Annualized Costs to Federal Government**

The start-up cost for developing the new ETA on-line reporting system is estimated to be \$160,000, including contractor and DOL staff time. The annual cost of maintaining the system and providing training and technical assistance to grantees for using the system, including contractor and DOL staff time, is estimated to be \$390,000. The total annualized costs are \$390,000 + \$53,333 (\$160,000 divided by three years) or \$443,333. Once the reporting system is developed, the annualized costs will be \$390,000 per year.

### **A.15 Changes in Burden**

This is a new information collection.

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

Grantees will continue to submit MIS performance reports on a quarterly basis to ETA within 45 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 Youth Offender reports may be included in these reports. The data will also continue to 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. No complex analytical techniques are contemplated.

**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.