

Supporting Statement for OMB Control No. 1205-0478: American Recovery and Reinvestment Act (ARRA), High Growth and Emerging Industries (HGEI) Grants

A. Justification

This supports the Department of Labor, Employment and Training Administration (ETA) request to extend with no revisions OMB Control No. 1205-0478: American Recovery and Reinvestment Act (ARRA), High Growth and Emerging Industries (HGEI) Grants, for reporting and recordkeeping requirements for Green Jobs Innovation Fund (GJIF) grants awarded under Solicitation for Grant Applications (SGA) SGA/DFA PY 10-07. As all ARRA HGEI grants will end prior to the expiration of the OMB-approved reporting requirements for these grants, this request for extension with no revisions reflects significantly decreased burden estimates. Further, this reporting structure features standardized data collection from program participants and quarterly performance and narrative progress report formats. All data collection and reporting is done by the grantees.

These performance reporting requirements align with outcome categories identified in the SGA used to award the GJIF grants, as noted above. The collection of this data helps ETA report the impact of these funds and provides ETA with more comprehensive information on the status of individual grants and individuals that receive services and find employment through these grants. 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, including the GJIF grants helps improve the quality of performance information that is received by ETA. This data also helps ETA provide more targeted technical assistance to support improvement of grantee outcomes. Under the current OMB-approved reporting requirements, ETA has provided GJIF grantees with a data collection system, the GRAD system, which supports (a) the collection of participant data for required reporting elements and (b) the submission of quarterly performance (ETA-9153 Form) and narrative reports to ETA. This data also allows ETA to report performance accountability information on the use of Workforce Investment Act funds.

A.1 Reasons for Data Collection.

The American Recovery and Reinvestment Act of 2009 (The Recovery Act) was signed into law by President Obama on February 17, 2009. Funding directed to the Department of Labor from the Recovery Act provided \$750 million for a program of competitive grants for worker training and placement in high growth and emerging industries, which included \$500 million in funding for energy efficiency and renewable energy, often referred to as "green jobs." In the FY 2010 budget approximately \$40 million in grant funds were authorized by the Workforce Investment Act of 1998, Title I, Subtitle D,

Section 171(d), Public Law 105-220 for GJIF. With grants funded through GJIF, the Department is emphasizing two key workforce strategies that move participants along green career pathways by: 1) forging linkages between Registered Apprenticeship and pre-apprenticeship programs, and/or 2) integrating the delivery of technical and basic skills training through community-based partnerships.

It is critical to record the impact of all these resources, current information on participants in these grants, and the services provided to them. ETA received initial approval for this information collection in June, 2010. All the ARRA HGEI grants will end by November 30, 2013, but to ensure that it can continue to obtain comprehensive information on participants served by and services provided with Federal resources, ETA proposes an extension with no revisions of the OMB-approved information collection for GJIF grantees.

The GJIF grantees consist of 6 grantees awarded grants under the following SGA: Green Jobs Innovation Fund Grants (SGA/DFA PY 10-07). The data collection will consist of individual data on participants, which is reported by the grantees. It will also include a quarterly narrative report which is completed by GJIF grantees providing a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter. It will also have a quarterly performance report (ETA-9153 Form) that includes aggregate data on demographic characteristics, types of services, outcomes, and retention and follow-up status.

A.2 Users, Purposes, and Consequences of Failure to Collect the Information.

Grantees will enter data on individuals who receive services from GJIF programs as well as on other activities provided through these grants. This data will be used by ETA to evaluate performance and delivery of GJIF grant-funded services and activities. The GJIF Performance Reporting Handbook has information on the required data elements to be collected by grantees, and refers to a separate document that contains a list of these required data elements. Grantees are required to collect additional participant data beyond those elements required by the SGA.

ETA uses the data to track characteristics, services, and outcomes for participants served through these grants. ETA also uses the data to target technical assistance to support improvement of grantee outcomes.

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

A.3 Technology and Obstacles Affecting Reporting Burden.

In compliance with the Government Paperwork Elimination Act (GPEA), ETA is streamlining the collection of participant data with new technology by supplying a data collection system, uniform data elements, and data definitions to grantees. ETA expects that this data collection system, the GRAD system, will continue to be in place through December 2016.

All GJIF quarterly performance (ETA-9153) and narrative reports will be submitted to ETA using the GRAD system.

A.4 Efforts to Identify Duplication.

Data items collected by program reports and individual records are needed to: (1) account for the specific services and activities being implemented by each grantee; (2) better identify overlapping and unproductive duplication of services, enabling grantees to maximize their use of GJIF resources; and (3) enable ETA to provide targeted technical assistance so that grantees can achieve the best outcomes possible. Information collected is not available through any other data collection or report system.

A.5 Methods to Minimize Burden on Small Business.

This collection does not impact small businesses.

A.6 Consequences of Less Frequent Data Collection.

The consequences of less frequent data collection include challenges in tracking and evaluating the performance of individual grants as well as an inability to provide timely, comprehensive reports on the use and impact of Workforce Investment Act funds. Further, ETA would not be able to identify challenges facing grantees and provide technical assistance to help them address these challenges, resulting in lower grantee outcomes such as the number of participants entering and retaining employment.

A.7 Special Circumstances Involved in Collection of Data.

This data collection effort does not involve any special circumstances.

A.8 Preclearance Notices and Responses.

A review notice was published in the *Federal Register* on August 8, 2013 (Vol. 78, p 48462) to solicit public comments. No comments were received.

A.9 Payments to Respondents.

There are no payments to respondents other than the grant funds awarded to the organizations that receive grants through the following SGA: SGA/DFA PY-10-07.

A.10 Confidentiality

ETA is responsible for protecting the confidentiality of the participants and 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. 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 confidentiality of the data. ETA's Office of Policy Development and Research has been an active participant in the development and approval of data security measures. The aggregate information collected through this request will not contain any individually identifying information.

A.11 Questions of a Sensitive Nature.

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, the GRAD system will include security measures. Participant responses to sensitive questions will allow ETA to comprehensively evaluate the effectiveness of the Workforce Investment Act programs.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the GJIF reporting system has three components: (1) the participant data collection burden; (2) the quarterly performance report (ETA-9153 Form) burden; and (3) the quarterly narrative report burden. GJIF grantees are subject to all three components. This response provides a separate burden for each of the three components.

(1). Participant Data Collection Burden

The GJIF **participant data collection burden** considers the amount of participant and performance-related information collected and reported on participants 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 collection burden will vary by participant based on the range and intensity of services provided by the grantee. For example, data collection may involve acquiring information from various partners regarding employment training and placement, in addition to the collection of personal and demographic information by the grantees themselves.

Record Type	Hours Per Record	Estimated Annual National Count	Annual National Burden Hours
Participant	1.8	6640	11,952

(2). Quarterly Performance Report Burden

The GJIF **quarterly performance report burden** takes into account that GJIF grantees are required to use the GRAD system to generate quarterly performance reports (ETA-9153). The GRAD system is designed to apply edit checks to participant data and to generate facsimiles of the aggregate information on enrollee characteristics, services provided, outcomes, and retention and follow-up status in quarterly report format. The burden includes reviewing and correcting errors identified by the GRAD system in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports (ETA-9153). Based on past experience, ETA assumes that each grantee spends approximately two days (16 hours) per quarter preparing this report.

Report	Hours per Response	Hours Per Year Per Respondent	Number of Respondents	Annual National Hours
Quarterly Performance Report	16	64	6	384

(3). Quarterly Narrative Report Burden

The GJIF **quarterly narrative report burden** involves providing a detailed account of all activities undertaken during the quarter including in-depth information on strategic partnerships, status of leveraged resources, timelines, deliverables, and capacity-building activities (where applicable). Key issues, technical assistance needs, best practices, and lessons learned should also be included in the quarterly narrative report. It is assumed that each grantee will spend approximately two days (16 hours) per quarter preparing this report.

Report	Hours per Response	Hours Per Year Per Respondent	Number of Respondents	Annual National Burden Hours
Quarterly Narrative Report	16	64	6	384

A.13 Estimated Cost to Respondents

(1) Start-up/capital costs: There are no start-up costs, as ETA has provided grantees with the GRAD system, a free web-based, data collection system that grantees will use to collect and maintain participant data, apply edit checks to the data, generate the quarterly performance report and submit narrative reports.

(2) Annual costs: There are no annual costs, as ETA will be responsible for the annual maintenance costs for the GRAD system.

A.14 Estimates of Annualized Costs to Federal Government

ETA funded the initial cost of developing the GRAD system by updating an existing system utilized for ARRA grantees - RAD. Estimated ongoing maintenance costs of GRAD are approximately \$180,000 per year, a reduction from the previous estimation because of the significant reduction in grantees.

A.15 Changes in Burden

The total number of still active grants has diminished from 244 to 6. Therefore, the burden estimates significantly decreased from the previously approved request.

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

Grantees submit narrative reports and performance reports through the GRAD system on a quarterly basis to ETA within 45 days of the end of each quarter. Quarterly report data is analyzed by ETA staff and used to evaluate performance outcomes and program effectiveness.

Each year, ETA issues a report summarizing program performance based on the Secretary's goals. Data contained in the quarterly reports may be included in these reports. The data will also be used to prepare Government Performance and Results Act (GPRA) reports, management and budget reports, and other ad hoc reports. All reports are available on the internet and accessible to the public.

A.17 Display of OMB Expiration Date.

The Expiration Date is displayed.

A.18 Exceptions to the Certification Statement

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This information collection request does not contain statistical methods.