

**PART A: SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT
SUBMISSION:**

Workforce Innovation Fund (WIF) Grants Reporting and Recordkeeping Requirements

A. JUSTIFICATION

This is a justification for the Department of Labor, Employment and Training Administration’s (ETA) request to implement reporting and recordkeeping for the Workforce Innovation Fund Grants (WIF) [SGA/DFA PY-11-05]. This reporting structure features quarterly performance narrative reports that document the innovative strategies and collect information about effective practices and “lessons learned” from the diverse projects funded by the WIF. All data collection and reporting is done by grantee organizations (state or local government).

These performance reporting requirements align with outcome categories identified in the SGA used to award the WIF grants, as noted above. The quarterly performance narrative reports provide a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter. Specifically, these reports include aggregate information on participants’ grant progress and accomplishments, grant challenges, grant technical assistance needs and success stories and lessons learned. The performance outcomes are defined by each grantee; each grant has a unique set of performance goals and outcome measures according to the specific innovation and project being pursued in the grant. The performance narrative reports, to be completed quarterly, include a narrative of grant activities and the unique grant performance and evaluation measures and key project milestones identified by the grantees. As a result, the performance measures for each grant will be different.

The collection of this data helps ETA report the impact of the WIF funds and provide ETA with comprehensive information on the status of each individual grant. This data will assist ETA to provide targeted technical assistance to the grantee based on individual needs in an effort to support and improve grant outcomes. The information provided in the quarterly performance narrative reports, including the lessons learned through innovative projects, are necessary for increasing the body of knowledge about what works in workforce development. The individual performance metrics for each grant allows each grantee to report on the unique processes and outcomes for their project. As ETA has provided an optional use plan and template to grantees, the Agency is submitting an Information Collection Request to ensure Paperwork Reduction Act compliance.

A.1. Circumstances Necessitating Data Collection

The WIF was created as a grant program by the Full-Year Continuing Appropriations Act, 2011 (in Sec. 1801, Title VIII, Div. B of PL 112-10). According to this Act, the WIF was established to “carry out projects that demonstrate innovative strategies or replicate effective evidence-based strategies that align and strengthen the workforce investment system in order to improve program delivery and education and employment outcomes for program beneficiaries.” One of the purposes of the WIF grants is to contribute to the documentation of evidence-based practice within the field of workforce development. In applying for WIF grants, grantees agreed to meet ETA’s reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA

PY-11-05), which requires the submission of quarterly reports within 45 days after the end of the quarter. Currently, the WIF grantees submit a quarterly narrative in whatever format they choose, though ETA provides a suggested format.

Each grantee created a performance accountability framework that identified performance and evaluation measures in the grant. After the grant is awarded, each grantee submits a performance tracking template that includes the performance and evaluation measures for the project as well as the key project milestones. The suggested quarterly performance narrative report format that ETA provides to the grantees is Attachment A.

Traditionally, ETA tracks the success of its workforce investment programs in terms of common measures (e.g., job placement, retention, earnings, etc.). While many WIF grants may continue to use these measures, ETA encourages WIF projects to identify and capture new sets of data that align with the innovative activities, outputs and outcomes described in the grant, thereby allowing grantees and ETA to document a new set of achievements. There are seven types of grants (interventions) funded under WIF, including Industry (5 grantees), Career Pathways (6 grantees), MIS (3 grantees), New Population (4 grantees), Service Providers/New Service (2 grantees), Change Management (3 grantees) and Online Delivery (3 grantees). Some training grants will collect outcome measures similar to ETA's Common Measures, but grantees have identified performance measures that are unique to their project such as percentage of participants that become self-employed, number of apprentices in program, attainment of permanent housing and number of employers accessing online registry.

The performance narrative report is submitted on a quarterly basis by all WIF grantees. These quarterly performance narrative reports are the primary mechanism through which ETA will understand the significant innovations and successes, the challenges encountered and strategies for resolution, and technical assistance needs to ensure the successful implementation of projects.

A.2. How, By Whom, and For What Purpose the Information Is to Be Used

Grantees are expected to submit a quarterly progress report, called a performance narrative report, within 45 days after the end of each calendar year quarter. The report must include quarterly information regarding grant activities. The last quarterly progress report that grantees submit will serve as the grant's Final Performance Report.

The information from these reports will be used by ETA and other DOL agencies to evaluate performance of the WIF projects and collect lessons that were learned in terms of processes, strategies and performance from the projects. ETA uses the data to help inform policy about the workforce and possible changes in structures and policies that enable a closer alignment and integration of workforce development, education, human services, social insurance, and economic development programs. ETA also uses the data to provide technical assistance to support improvement of individual grantee outcomes.

Within ETA, the data is used by the Offices of Workforce Investment, Policy Development and Research, Financial and Administrative Management, Information Systems 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. Use of Technology to Reduce Burden

In compliance with the Government Paperwork Elimination Act (GPEA), ETA will streamline the collection of data by leveraging existing technology rather than developing a unique reporting system with attendant portal, software, etc. Grantees may report on the suggested quarterly reporting template or a similar one, using whatever existing technology they have to collect the data, i.e. word processing and any spreadsheets they choose to develop for their own tracking purposes. Grantees will email their quarterly reports to ETA.

A.4. Efforts to Identify Duplication

Because each of the WIF grantees is attempting to implement an innovative approach, this data collection effort does not represent duplication of existing/available data. There is no other source for the information that will be collected in the quarterly performance narrative reports. Data items collected by the performance narrative reports are needed to: (1) account for the specific services and activities implemented by each grantee; (2) build a body of knowledge about effective practices and “lessons learned” about innovative strategies in the workforce system; and (3) enable ETA to provide targeted technical assistance so that grantees can achieve the best outcomes possible. Information collected on the WIF grants is not available through any other data collection or report system.

A.5. Methods to Minimize Burden on Small Businesses

This collection does not impact small businesses.

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 DOL shall prescribe the frequency with which performance reports shall be submitted, and that performance reports shall not be required more frequently than quarterly or, less frequently than annually. Although these requirements do not directly apply because the WIF grantees include only State Agencies, Local Workforce Investment Boards and consortia of those entities, this regulation sets a standard for frequency of reporting and data collection. In applying for WIF grants, grantees agreed to meet ETA’s reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY-11-05), which requires the submission of quarterly reports within 45 days after the end of the quarter.

Additionally, collecting reports less frequently would severely compromise ETA’s ability to monitor the progress of the grants, build a body of knowledge regarding these innovative projects and provide effective technical assistance to the grantees.

A.7. Special Circumstances for Data Collection

None of the data collection efforts involve any special circumstances.

A.8 Preclearance Notices and Responses

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to review the information collection request; a notice was published in the *Federal Register* on January 31, 2014 (vol. 79, p. 5459). No comments were received.

As part of the development of the Solicitation for Grant Application for the WIF grants, ETA consulted with various Federal agency partners, including the Department of Education, Health and Human Services and Office of Management and Budget staff, for feedback on data collection instruments, types of data collection, and the availability of data, as well as the overall program design and reporting requirements for the WIF grants. Consultations with other agencies helped refine the scope of the project and ETA designed the reporting to follow the agreed upon objectives, but did not result in any significant impact on the proposed information collection.

A.9 Payments to Respondents

There are no payments to respondents other than the funds provided under the grant agreement.

A.10. Confidentiality Assurances

Instruments for this ICR do not offer an express assurance of privacy, as the quarterly performance narrative reports do not require the submission of individually identifying data. ETA is responsible for protecting the privacy of the WIF performance data and takes steps to ensure underlying data is maintained in accordance with all applicable Federal laws, with particular emphasis on compliance with the provisions of the Privacy and Freedom of Information Acts. This data is covered by a System of Records Notice, DOL/ETA-15, published April 8, 2002 (67 FR 16898 et seq.). DOL is working diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted. All contractors with access to individually identifying information are required to provide assurances that they will respect and protect the privacy of the data.

A.11. Additional Justification for Sensitive Questions

The quarterly performance narrative reports do not require the submission of sensitive data.

A.12. Estimates of the Burden of Data Collection

The annual national burden for WIF data collection has two components: (1) the respondent data collection burden; and (2) the data collection cost burden. This response provides a separate burden for each of the two components.

The WIF data collection burden considers the amount of participant and performance-related information collected 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 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, and the outcomes reported in the performance reports are different for each grant. To reduce grantee burden, each grantee will report only on performance measures previously identified as specifically applicable to that grant.

Quarterly Performance Narrative Report Burden

The WIF quarterly performance narrative report burden involves providing a detailed account of all activities undertaken during the quarter including in-depth information on accomplishments, promising approaches, progress toward performance outcomes, and upcoming grant activities. Key issues, technical assistance needs, best practices, and lessons learned should also be included in the quarterly narrative report. ETA assumes each grantee will spend approximately twenty hours per quarter preparing the report. This estimate is based on the calculations made for the H1B Technical Skills Training Grants (OMB Control Number 1205-0507), which have similar quarterly performance narrative report formats. The hour burden estimate assumes that grantees will define the performance outcomes appropriate for their unique grants. As a result, the outcome performance measures are different for each grant. The hour burden estimate includes compiling and reviewing the information quarterly.

The estimate for the data collection burden hours is based on consultation with similar programs. **Hourly rates used to calculate costs depend upon the type of organization administering the program. The rate used in this table is based on the most current BLS data for Office Administrative Services personnel (May 2013, data) mean national hourly wage rate: <http://www.bls.gov/oes/current/oes430000.htm>.*

Table– Summary

Activity	Estimated Number of Respondents	Respondent’s Annual Frequency of Response	Total Annual Responses	Average Burden Hours Per Response	Total Annual Burden Hours	Monetized Burden Hours \$16.78
Quarterly Performance Narrative Report	26	4	104	20	2,080	\$34,900. \$

A.13 Estimated Cost to Respondents

a) Start-Up/Capital Costs: There are no start-up costs because no additional processes or systems are required beyond those needed to manage the project.

b) Annual Costs: There are no annual costs because no additional processes or systems are required beyond those needed to manage the project.

A.14. Estimates of Annualized Costs to Federal Government

No additional processes or systems are required beyond those needed to manage the project. However, collecting, organizing, analyzing, and reporting on grantee performance will require a minimum of 40 hours per quarter for a Workforce Analyst. This estimate is based on OPM data for a mid-range wage for a Workforce Analyst. A GS-11 step 5 in Washington, DC earning \$34.26 per hour, spends 40 hours reviewing the information respondents provide. The cost for the Federal salary is \$ 1370.40 per quarter, \$5481.60 per year. http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/DCB_h.pdf

A.15 Changes in Burden

This is a new information collection request.

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

Grantees will submit performance narrative 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 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. Approval Not to Display OMB Expiration Date

The expiration date for the OMB approval will be displayed.

A.18. Exceptions

No exceptions are requested in the "Certification of Paperwork Reduction Act Submissions."

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not contain statistical methods employed in collecting baseline data.