YOUTHBUILD
OMB 1205-0464
JULY 2015

YouthBuild, OMB 1205-0464: SUPPORTING STATEMENT FOR REQUEST for Extension without Revisions FOR OMB APPROVAL UNDER THE PAPERWORK REDUCTION ACT OF 1995

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A.   JUSTIFICATION

The Department of Labor, Employment and Training Administration (ETA) requests the Office of Management and Budget's approval of the extension, without revisions, of the reporting and recordkeeping requirements of the YouthBuild (YB) program.

This standardized data collection for program participants – quarterly reports and Management Information System (MIS) quarterly reporting – is completed by YouthBuild grantees. The Work Site Description Form, ETA-9143, Parts A and B, is completed as part of each grant application and annually by YouthBuild grantees to provide information to ETA on the proposed work sites for training participants in construction skills. The Annual Housing Census, ETA-9143, Part C is completed once annually by YouthBuild grantees to provide information to ETA on the number of affordable housing units built or renovated by YouthBuild participants.

The quarterly performance report (ETA-9136) includes aggregate and participant-level information on demographic characteristics, types of services received, placements, outcomes, and follow-up status. Specifically, this report collects data on individuals who receive education, occupational skills training, leadership development services, and other services essential to preparing at-risk youth in-demand occupations through YouthBuild programs. There are no changes proposed for ETA-9136 in this information collection request package.

The Work Site Description Form (ETA-9143) collects information on the work sites proposed by prospective and current YouthBuild applicants that will be used for training activities required under the solicitation. Part C of the Work Site Description Form is the Housing Census, which is submitted by grantees on an annual basis to capture information on the number of units of affordable housing built annually by YouthBuild participants. There are no changes proposed for ETA-9143 in this information collection request package.

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

The YouthBuild program, authorized by the Workforce Innovation and Opportunity Act (Pub. L. 113-128) is designed to: enable disadvantaged youth to obtain the education and employment skills necessary to achieve economic self-sufficiency in occupations in high-demand and post-secondary education and training opportunities; provide disadvantaged youth with opportunities for meaningful work and service to communities; foster the development of employment and leadership skills and commitment to community development among youth in low-income communities; and expand the supply of permanent affordable housing for homeless individuals and low-income families by utilizing the energies and talents of disadvantaged youth.

The YouthBuild Transfer Act also emphasizes post-secondary transitions for participants and stronger linkages with the One-Stop Career Center System, community colleges, and apprenticeship programs.

YouthBuild assists youth who are often significantly behind in basic skills in obtaining a high school diploma or state-recognized equivalency. In YouthBuild, unemployed and undereducated young people ages 16-24 work toward their high school diploma or state-recognized equivalency degree while learning job skills by building affordable housing for homeless and low-income people. The primary target populations for YouthBuild are adjudicated youth, youth aging out of foster care, out-of-school youth, and other at-risk populations. The reporting and recordkeeping system incorporates each of these aspects necessary for program evaluation.

Three outcome measures currently determine success in the YouthBuild grants: placement in employment or education, attainment of a degree or certificate, and literacy and numeracy gains. These are the youth common performance measures implemented across federal job training programs as of July 1, 2005. By standardizing the reporting and performance requirements of different programs, the common measures give ETA the ability to compare across programs the core goals of the workforce system—how many people entered jobs; how many stay employed; and how many successfully completed an educational program. In addition to the three outcome measures, grantees report on a number of leading indicators that serve as predictors of success. These include participation in education or training, attainment of degrees and certificates, workforce preparation, mentoring, community service, post-secondary exploration and preparation, and leadership development.

Beginning in July of 2015, the new Workforce Innovation and Opportunity Act (WIOA) legislation takes effect. With it, a set of new performance measures, common to adults and youth across programs, will be developed and implemented in Program Year 2016. The ETA-9136 will be revised to support these performance measure changes and a new information collection request will be created at that time.

In applying for the YouthBuild grants, grantees agree to submit participant data and aggregate reports on enrollee characteristics, services provided, placements, outcomes, and follow-up status. Grantees collect and report quarterly YouthBuild performance data using an ETA-provided MIS. The MIS is a web-based case management and reporting application housed on ETA's servers.

Pub.L. No. 105-220, Sec 185(d) (The Workforce Investment Act) 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; and
    - information necessary to prepare reports to comply with section 188 and 29 CFR Part 37.37 [(a-b),(d-e)]; and,
- 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.

Pub.L. No. 105-220, Sec 189(d) (The Workforce Investment Act) 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; 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

Grantees implement recordkeeping and reporting requirements with grant funds. As a government-procured MIS is provided to all grantees, their implementation costs are minimal. Grant funds are also used with the prior approval of the grant officer to upgrade computer hardware and Internet access to enable projects to use the MIS.

Grantees enter data into the MIS on individuals who receive services through YouthBuild programs. These data will be used by the Department and ETA to evaluate performance and delivery of YouthBuild program services. The MIS allows grantees to collect additional participant data beyond those elements required by YouthBuild.

ETA uses the data to track total participants, characteristics, services, and outcomes for YouthBuild participants. Common measures enhance ETA's ability to assess the effectiveness of the YouthBuild program within the broader youth workforce investment system.

Within ETA, the data are used by the Offices of Workforce Investment, Financial and Administrative Management, Policy Development and Research, and Field Operations (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 are 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 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, a web-based MIS/Case Management System is provided to the grantees, and data elements and data definitions are uniform across ETA programs. All YouthBuild data and reports are submitted to ETA via the Internet. Grantees collect, retain, and report all information electronically through the ETA-provided MIS.

A.4 Efforts to Identify Duplication

A hallmark of WIA Title I is increased accountability in exchange for optimal flexibility. Title I has strengthened accountability by requiring more comprehensive performance standards and establishing quarterly reports for demonstration projects. The data items identified in Attachment A are needed on the individual MIS records to support the measures, and much of these data will be used by grantees to prepare the quarterly progress 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. Data items collected by program reports and individual records are needed to: (1) account for the detailed educational, occupational skill training, post-secondary planning and placement, and leadership services and activities provided by YouthBuild program grantees to help at-risk youth participants get and keep well-paying jobs; (2) better identify overlapping and unproductive duplication of services; and (3) reduce the effect of stove-piped data and generate performance information across

employment and training programs. Information provided through the YouthBuild management information and reporting system is not available through other data collection and report systems.

A.5 Methods to Minimize Burden on Small Businesses

For reporting purposes, the involvement of small businesses or other small entities that are not grantees or sub-grantees is extremely limited. The only time contacting them may be required is during the provision of a service. Methods to minimize the burden on small entities that are grantees or subgrantees are discussed in other sections of this supporting statement.

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 30 days after the reporting period. If ETA did not comply with these requirements, funding for discretionary grant programs would be compromised. In applying for YouthBuild grants, grantees agree to meet ETA's reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY13-04), which requires the submission of quarterly reports within 45 days after the end of the quarter. As well, the SGA requires that grantees demonstrate past performance and this is accomplished for previous DOL-funded YouthBuild grantees through a review of the performance data submitted in the MIS.

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 60-Day Notice for Public Comment was published in the *Federal Register* (Vol. 80, No. 58, March 26, 2015). No comments were received.

A.9 Payment of Gifts to Respondents

There are no payments to respondents other than the grant funds described in the Funding Opportunity Announcement (FOA-ETA-15-05).

A.10 Confidentiality Assurances

ETA is responsible for protecting the confidentiality of the YouthBuild 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. The Department ensures 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 Information Services and Technology has been an active participant in the development and approval of data security measures – especially as they apply to the web-based version of the YouthBuild system.

A.11 Additional Justification for Sensitive Questions

While sensitive questions are asked of participants in the proposed data collection, the confidentiality of participants is protected as discussed in section A.10, and many of these questions are optional, not required. In addition, security is built into the data collection system by the MIS contractor. Participant responses to these sensitive questions allow ETA to comprehensively evaluate the effectiveness of the YouthBuild program and the data is not shared with employers or other outside partners. Sensitive questions are asked only for case management purposes in order to ensure participants are able to access all available supportive services.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the YouthBuild reporting system has three components: (1) the participant data collection burden; (2) the quarterly narrative progress report burden; and (3) the quarterly performance report burden. This response provides a separate burden for each of the three components.

(1). Participant Data Collection Burden, ETA 9136

The YouthBuild *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 solely to comply with the federal reporting requirements.

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	Annual National Burden Dollars
Participant	1.8	6,000	10,800	$13.62	$147,096

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 2015, Current Employment Statistics Survey, U.S. Census Bureau). Source: http://www.bls.gov/web/empsit/ceseeb8a.htm

(2). Quarterly Progress Reports Burden, ETA 9138

A. Narrative Report: The YouthBuild *quarterly narrative progress report burden* provides a detailed account of all activities undertaken during the quarter including in-depth information on accomplishments, promising approaches, progress toward performance outcomes, upcoming grant activities, and updates on product, curricula, and training development. Each grantee spends approximately two days (16 hours) per quarter preparing this report, according to the experience of the grantees to date.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Narrative Progress Report	64	200	12,800	$13.62	$174,336

B. Performance Report: The *quarterly performance report burden* assumes that all grantees will use the ETA-provided MIS to generate quarterly performance reports. The MIS applies edit checks to participant data and generates facsimiles of the aggregate information on enrollee characteristics, services provided, placements, outcomes, and follow-up status in quarterly report format. The burden includes reviewing and correcting errors identified by the MIS in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Performance Report	64	200	12,800	$13.62	$174,336

(3). Work Site Description, ETA 9143 (Parts A, B, and C)

A. Work Site Description (Parts A and B): As part of the grant application, prospective applicants are required to submit information about the work site(s) that will be used as training for YouthBuild participants using the Work Site Description form that consists of Part 1A and Part 1B. Grantees are also required to submit these forms during the period of performance at any point when they propose to utilize additional work sites to guarantee that the grantee has access to a suitable and qualifying work site property to use in the training of YouthBuild participants. This form includes information on estimated construction costs and sources of funding. The burden is estimated at 30 minutes per submission; this burden, annualized over the three-year period of this request for extension, is 10 minutes per year.

Prospective Applicants

Report	Average Annualized Hrs.	Average Number of	Annual National	Applicable Hourly	Annual National

	Per Year Per Prospective Applicant	Applicants*	Hours	Rate	Burden Dollars
Work Site Description (Part A & B)	.5 hour	425	212.50	$13.62	$2,894.25

*Based on the average number (425 per year) of applications received in ETA's last three YouthBuild competitions.

Existing YouthBuild Grantees

Report	Annualized Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Work Site Description (Part A & B)	.5 hour	200	100	$13.62	$1,362.00

B - Housing Census Form (Part C): After the grant award has been made, grantees will be required to complete Part C of the Work Site Description form to submit information on the number of houses or apartments built or renovated by YouthBuild participants during the previous year. The burden is estimated at 30 minutes annually.

Report	Annualized Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Work Site Description – Part C Housing Census Form	.5 hour	200	100	$13.62	$1,362.00

TOTAL annual hours for 200 grantees: 10,800 + 12,800 + 12,800 + 212.50 + 100 + 100 = 36,812.50

A.13 Estimated Cost to Respondents

   a) **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.

b) **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 annual costs of maintaining the system and developing training and technical assistance guides, estimated to be $285,000, are borne by ETA.

A.15 Changes in Burden

The decrease in burden is due to reduction in the number of grantees in this program, from 220 three years ago to 200, based on current annual appropriations.

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

Grantees submit narrative progress and MIS performance reports on a quarterly basis to ETA within 45 days of the end of each quarter. Quarterly report data are 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 YouthBuild reports may be included in these reports. The data will also 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.

Product	Submission Date	Comments
Quarterly Narrative Progress Report	Within 45 days after the end of the quarter.	Quarterly progress reports and MIS data will be submitted electronically using ETA's On-Line Electronic Reporting System.
Quarterly Performance Report	Within 45 days after the end of the quarter.	
Work Site Description Part A & B	Prospective Applicants: Submit with grant application. Existing Grantees: Submit an average of two additional Work Site	Part A & B will be submitted either electronically or in hard copy by both the prospective applicants and existing grantees.

	Description forms during the life of the grant	
Work Site Description Part C	Annually within 45 days of grant award anniversary date	Part C - Housing Census reports will be submitted via E-Mail

A.17 Approval Not to Display OMB Expiration Date

ETA is not seeking approval to conceal the OMB Expiration Date**.**

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.