

**THE SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM
(SCSEP): OMB 1205-0040
Supporting Statements, Part A**

JUSTIFICATION

Introduction: This information collection revision request contains program performance reports for the Senior Community Service Employment Program (SCSEP).

The SCSEP, authorized by Title V of the Older Americans Act, amended 2006 (OAA-2006), Pub. L. No. 109-365, is the only federally sponsored employment and training program targeted specifically to low-income older individuals who want to enter or re-enter the workforce. Participants must be unemployed, 55 years of age or older, and have incomes no more than 125 percent of the federal poverty level. The program offers participants training at community service assignments in public and non-profit agencies. The dual goals of the program are to promote useful opportunities in community service activities and to also move SCSEP participants into unsubsidized employment, where appropriate, so that they can achieve economic self-sufficiency.

Program-specific measures to monitor the performance of each SCSEP grantee were first codified in the 2000 amendments to the OAA. The OAA-2006 amendments expanded these performance measures. The Department then refined the 2006 statutory measures in its regulations published June 29, 2007 (SCSEP IFR) and September 1, 2010 (SCSEP FR), and codified at 20 CFR Part 641 Subpart G. There are six core indicators of performance: (1) hours (in the aggregate) of community service provided compared to the number of hours funded by the grant; (2) entry into unsubsidized employment; (3) retention in unsubsidized employment for six months; (4) average earnings; (5) the number of eligible individuals served compared to the number of positions funded; and (6) the average number of most-in-need barriers of the individuals served. Additional indicators of performance include: (1) retention in unsubsidized employment for 1 year; (2) satisfaction of the participants, employers, and host agencies with their experiences and the services provided; and (3) exiting participants who enter volunteer work.

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and or regulation mandating or authorizing the collection of information.**

The information collection is necessary to comply with statutory and regulatory requirements discussed in the table below. The information is also necessary for grantee performance accountability and program management.

<i>FORM</i>	<i>LEGISLATIVE CITATIONS OAA-2006</i>	<i>REGULATORY CITATIONS</i>
Participant, Community Service Assignment, Exit, Unsubsidized Employment	Sections 502(a)(1), 502(b)(1)(C), 502(e), 503(f), (g)	641.879(a) 641.700
SCSEP Equitable Distribution Report	Sections 507(a), (b), Section 508	641.325(a), 641.360, 641.879(c)
Customer Satisfaction Surveys	Sections 513, 514, 502(e), 503(f), (g)	641.710

2. Indicate how, and by whom, and for what purpose the information is to be used. Except for a new collection indicate the actual use the agency has made of the information received from the current collection.

The Department uses four data collection forms (ETA 9120, 9121, 9122, and 9123) inside the SCSEP Performance and Results QPR System (SPARQ) to record information about SCSEP program participants and to measure grantees' progress toward agency goals and objectives. The QPR is populated from the four SPARQ data collection forms. The Department uses the information to manage the program and to report program results to the public and the Congress. OAA-2006 created revised reporting requirements. These requirements continue the collection of information that can be used to measure performance against program goals and to implement corrective actions should performance prove inadequate. Corrective actions for state grantees under the OAA-2006 may include a reallocation of the grantee's funding to another entity. National grantees may be barred from participation in the next SCSEP competition if they fail to meet their aggregate goals for three successive years.

The Equitable Distribution Report (ETA 8705) has been used by the program for over 20 years.

It remains a requirement under section 508 of OAA-2006, which calls for state grantees, in conjunction with national grantees operating in the state, to submit a report that details an equitable allocation of SCSEP resources within the state based on county-by-county data showing the number of SCSEP-eligible persons in the population from the most recent U.S. Census. The Equitable Distribution Report allows the grantees provide information as to how slots are distributed to ensure that areas are serviced equitably and not underserved or overserved.

Section 503 of OAA-2006 provides for a single State Plan that outlines a 4-year strategy for the statewide provision of community service employment and other authorized activities for eligible individuals, which requires the Governor to solicit public involvement in the development of the Plan. ETA Form 8705 is used to determine the location of the SCSEP-eligible population and compares it with the actual location of program positions. The differences between the proportional share and the actual share form the basis for much of the State Plan activity. Among the agencies involved in preparing the State Plan are Workforce Investment Act (WIA) agencies, Area Agencies on Aging, community service agencies, and the SCSEP national grantees operating in that state. The purpose of the State Plan is to ensure that States address the employment situations and skills of the eligible population.

The OAA-2006 (Pub. L.109-365) requires that customer satisfaction surveys be conducted for all three customer groups: participants, host agencies, and employers. The Department is using the American Customer Satisfaction Index (ACSI) to meet the SCSEP customer satisfaction measurement needs. SCSEP has been conducting these surveys nationwide since 2004. The survey approach allows the program flexibility and, at the same time, captures common customer satisfaction information that can be aggregated and compared among national and state grantees. The measure is created with a small set of core questions that form a customer satisfaction index. The index is created by combining scores from three specific questions that address different dimensions of customers' experience. Additional questions that do not affect the assessment of grantee performance are included to allow grantees to effectively manage the program.

3. Describe the collection of information involving the use of automated, electronic, mechanical, or other technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

The Department requires grantees to submit data electronically in order to reduce costs. To accommodate the collection of information on the SCSEP performance measures, the Internet-based SCSEP Performance and Results QPR (SPARQ) system, which was launched during Program Year 2004. All grantees have been required to use SPARQ since PY 2012. The system is continually refined and revised to comply with new legal and programmatic requirements and to provide case management functionality requested by the grantees.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The SCSEP is a discrete program authorized by Title V of OAA-2006 to promote part-time community service employment and to foster individual economic self-sufficiency, thereby increasing the numbers of participants who obtain unsubsidized employment. The information collected includes participant personal characteristics, community service and employment records, statistics such as dates documenting progress through the program, and post-program follow-up information. Moreover, many of the performance measures that are required by this program are not collected by any other program and are uniquely defined. The data collection efforts require leveraging information so that no information is duplicated. For example, the equitable distribution information collected in 8705 will be reused in the State Plan updates—so the information is only collected one time but leveraged in other reports.

5. If the collection of the information impacts small businesses or other small entities, describe any methods used to minimize the burden.

Although small entities (generally non-profits) are active partners in the provision of community services and act as host agencies to program participants, these entities are not actively engaged in the reporting process, which is handled primarily by the grantee. The exception is that some small private employers and host agencies are chosen to receive customer satisfaction surveys. Response to these surveys is, however, voluntary.

6. Describe the consequence to the Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

The OAA-2006 requires the Department to implement corrective action if grantees' performance falls below specified negotiated levels. Quarterly Progress Reports allow the Department to monitor grantee progress toward its performance goals and provide timely assistance to the grantees if needed. Without accurate performance measures, the Department could not measure the success of its grantees, and could not ensure program participants are served by high-quality grants.

If the collection of information under the Administration's common performance measures initiative is conducted less frequently, it would be contrary to the definitions provided for the measures and inconsistent with the actions of other Federal agencies and other programs within the Department.

The Equitable Distribution Report is required annually by the OAA-2006. Failure to collect this information would be contrary to the legislation.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- more often than quarterly
- requiring a written response to an information collection in fewer than 30 days
- requiring more than an original and a copy
- requiring record retention longer than 3 years
- in connection with a statistical survey that is not designed to produce results which can be generalized to the universe of the study
- utilizing statistical data that has not been approved by OMB
- a pledge of confidentiality
- revealing a proprietary trade secret

This collection of information complies with 5 CFR 1320.5.

8. Consultation Efforts

As required by 5 CFR 1320.8(d), a Federal Register Notice regarding the extension of this information collection was published for 60 days' public comment on November 5, 2014 (Federal Register Vol. 79, No. 214, Page 65705).

The Department received 81 comments:

Comment (1): responder opposes programs that pay lower than the minimum wage.
Agency Response: SCSEP only pays participants minimum wage or higher.

Comment (1): responder opposes all funding for the program.
Agency Response: SCSEP is authorized by the Older American's Act and received a PY2015 appropriation.

Comment (1): responder would like the Quarterly Narrative Report to be specific for each grantee or a customized template.
Agency Response: Customized templates for all grantees would create additional burden on the grantees and the reviewers.

Comment (78): multiple responders requested that DOL not eliminate question 16 on the Customer Satisfaction Participant Survey and add an additional question.
Agency Response: We returned the original question 16 (about the pay) to the survey, but reworded it slightly. The additional question requested was a duplicate of 16 (worded differently) so we did not include it in the final survey to avoid duplication.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration to grantees.

The Department does not provide any payment for respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The customer satisfaction surveys inform respondents that their individual responses are confidential. Other data provided by customers are kept confidential to the extent provided under existing statutory authorities except when confidentiality is waived. The Department follows Department-wide data security measures for SPARQ.

A key concern is for the protection of participant social security numbers. Grantees must collect the Social Security Number (SSN) in order to properly pay participants for their community service work in host agencies. (The SSN is required for matching participant Unemployment Insurance wages in order to verify employment outcomes for the required performance measures.) However, when the participant record is first created, SPARQ converts the SSN to a unique participant identification number. Thereafter, the SSN is no longer visible in SPARQ and is never transmitted in either direction when the record is updated. Only the participant identification number is used to identify a record. The transmittal of participant files to DOL is always protected by secure encryption. Any information that is shared or made public is aggregated by grantee and does not reveal personal information on individuals.

In addition to the above, a Privacy Act Statement is provided to grantees for distribution to all program participants. Participants receive this information when they meet with a case worker or intake counselor. When the programs are monitored, implementation of this item is included in the review.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, and the explanation to be given to persons from whom the information is requested, and any steps taken to obtain their consent.

Questions of a sensitive nature include self-identification of a disability. Applicants are informed that Equal Employment Opportunity information – gender, ethnicity, race, and disability – is voluntary and that the refusal to provide it will have no effect on any decision to provide services to them. The collection of this information is similar to other programs (such as WIA) and complies with the requirements of the Americans with Disabilities Act. Moreover, disability status impacts eligibility under OAA-2006, and one of the mandated performance measures requires grantees to attempt to collect information about participants' barriers to employment.

12. Provide estimates of the hour burden of the collection of information.

As program appropriations decrease, grantees serve fewer participants, which have decreased burden hours. The response data for the three customer satisfaction surveys have also been adjusted downward based on PY 2013 usage statistics. In addition, SCSEP now operates with 72 grantees.

Senior Community Service Employment Program 2014 Burden Hour Estimates

Cite Reference	Total Respondents (Note 1)	Frequency	Total Responses	Average Time per Response	Burden Hours
Participant Data Form – ETA-9120 (Note 2)	72	Ongoing	68,000	12 minutes	13,600
Community Service Assignment Form – ETA-9121 (Note 2)	72	Ongoing	102,000	6 minutes	10,200
Unsubsidized Employment Form – ETA-9122 (Note 2)	72	Ongoing	12,000	6 minutes	1,200
Exit Form – ETA-9123 (Note 2)	72	Ongoing	28,000	6 minutes	2,800
Quarterly Narrative Progress Report (Note 3)	86	Quarterly	344	2 hours	688
State Equitable Distribution Report Form – ETA-8705A (Note 4)	52	Annually	52	3 hours	156
Grantee Equitable Distribution Report Form-ETA 8705B (Note 4)	68	Annually	68	3 hours	204
Participant Customer Satisfaction – ETA-9124A (Note 5)	12,800	Annually	12,800	10 minutes	2,134
Host Agency Customer Satisfaction – ETA-9124B (Note 5)	8,100	Annually	8,100	10 minutes	1,350
Employer Customer Satisfaction – ETA-9124C (Note 5)	1,100	Annually	1,100	10 minutes	184
Four-Year State Plan (and 2 year State Plan modifications)	56	Bi-annually	56	7.25 hours	406
TOTAL	////	////	232,520	////	32,922

Note 1 Respondents: *The total estimated number of respondents is calculated based on 72 state and national grants for most reports; a combined 22,000 customer satisfaction survey respondents; and 50 states, the District of Columbia, Puerto Rico, and four territories for the equitable distribution reports.*

Note 2 SPARQ QPRs: *The four data collection forms, ETA 9120, 9121, 9122, and 9123, are being revised to provide additional data fields to grantees that have received awards in PY 2013 under a limited competition for pilot grants. These new fields will enable grantees to provide the data needed to measure the implementation and outcomes of their pilot grants as required by the condition of their grant award. These new fields will be used by and will be available to only the sub-grantees and local projects that are participating in the pilot projects. No other users will have access to these fields. The collection of data in these new fields will end at the expiration of the pilot grants that were extended through December 2015, and the Department will submit a non-material change request to discontinue the use of these fields at that time.*

Note 3 Quarterly Narrative Report: *This year, ETA is introducing a quarterly narrative report to standardize the quarterly submission. The narrative report includes information that cannot be collected through other reports, such as capacity building efforts like staff training, outreach activities, and promising practices that should be shared with other grantees as well as technical assistance needs. The Narrative Report is for all 72 grantees and the 14 discretionary grants for a total of 86 reports.*

Note 4 Equitable Distribution Report: *The Equitable Distribution (ED) Report has been changed from previously submitted versions to reflect that all of the data required for an analysis of the equitable distribution of resources is now provided to grantees on SCSEPED.org, an application that shows the number of authorized positions by county as determined by the Census data and the number of enrollments by county as determined by the data in SPARQ. The application also provides various calculations of the variance between the two. The data are presented in table form by county at both a state level (which includes all grantees that operate in a state) and the grantee level. Grantees using the revised 8705A and 8705B are now relieved of all data collection burden for the ED report and are only required to summarize the variance information provided by SCSEPED.org and to answer two questions about the variance: what is its significance; and what, if any, actions the grantees will take to come into better compliance with the equitable distribution requirements. The data required by ETA 8705A and 8705B (Equitable Distribution Report) are obtained electronically by the grantees from SCSEPED.org and can be downloaded as an Excel-compatible spreadsheet. SCSEPED.org relieves grantees of the burden of collecting and analyzing equitable distribution and enrollment data for each county in which they operate.*

Note 5 Customer Satisfaction Surveys: *We are revising the additional questions in all three surveys for the first time since the surveys were introduced in 2004. The core questions that comprise the ACSI index are unchanged. The revisions reduce the total number of questions in the surveys, thus reducing the burden hours. (See Part B of the Supporting Statement for a discussion of customer satisfaction survey methodology.)*

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life); and (b) a total operation, maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining,**

disclosing or providing the information. Include descriptions of methods used to estimate cost factors including system and technology acquisition expected useful life of the equipment. Capital and start-up cost include preparation for collecting information: such as purchasing equipment and record storage.

- If cost estimates are expected to vary widely, agencies should present ranges and explain the reasons for the variance. The cost of purchasing or contracting out the information collection services should be a part of this cost burden estimate. In developing cost burden estimates the 60-day pre OMB submission public comment process and use existing economic and regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchase of equipment or services or portions thereof unless they are for the specific purpose of the collection of the additional information.

The SPARQ application does not require any software more advanced than Windows Operating System. The application is designed to run on any computer with broadband Internet access and Internet Explorer, Mozilla Firefox, Sahara, or other browsers. All grantees and sub-grantees have the equipment necessary to operate the application. Grantees need not incur any additional ongoing costs although there may be some minor costs (covered by grant funds) associated with training grantee staff to use the system. The SPARQ data collection application and SCSEPED are provided free to all grantees and sub-grantees. All grantees are required to use these two systems.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses, and other expenses that would not have been incurred without this collection effort. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Costs to the Federal Government of the SPARQ System

Report	Federal Review Hours	Average Hourly Wage (Note 6)	Number of Reviews	Total
QPR Report (Note 7)	3	\$41.07	360	\$44,356
SCSEP Portion of State Strategic Plan and Bi-annual Modifications	5	\$41.07	56	\$11,500
Equitable Distribution Report 8705A (State Report – 52) and 8705 B (Grantee Report-68)	2	\$41.07	120	\$9,857
TOTAL:	18	////	536	\$65,713

Note 6 Estimates: *The estimates above are based on past experience in reviewing the reports but also include judgments on the time needed to analyze the performance results and review new requirements. They are based entirely on estimated staff time needed to review the reports. The average hourly cost for Federal staff members who review reports is based on the OPM Washington DC Locality Pay Schedule, 2014 Federal employee (GS-12, Step 5). In addition to the above ongoing costs, ETA expects to incur contractor costs of \$2.9 million in 2014 for data specification, maintaining and testing the SPARQ software, and providing training and technical support to grantees using the system. These costs have been fully funded through the use of SCSEP set-aside funds.*

Note 7 SPARQ QPR: *4 quarterly reports plus the final report for a total of 5 reports reviewed per grantee.*

15. Explain the reasons for any program changes or adjustments to reporting in Items 13 or 14.

The federal cost burden increased to \$65,713 due in part to federal wage updates and because of the added program participants.

Here is a list of the changes from the last approved submission:

- **SPARQ QPRs:** The four data collection forms, ETA 9120, 9121, 9122, and 9123, are being revised to provide additional data fields to grantees that have received awards in PY 2013 under a limited competition for pilot grants. The new fields are in three of the forms, 9120 SPARQ Participant Form (40e), 9121 SPARQ Community Service Assignment Form (34a, 34b, 43a, and 43b), and 9122 SPARQ Unsubsidized Employment Form (19c and 19d). These new fields will enable grantees to provide the data needed to measure the implementation and outcomes of their pilot grants as required by the condition of their grant award. These new fields will be used by and will be available to only the sub-grantees and local projects that are participating in the pilot projects. No other users will have access to these fields. The collection of data in these new fields will end at the expiration of the pilot grants that were extended through December 2015, and the Department will submit a non-material change request to discontinue the use of these fields at that time
- **Quarterly Narrative Report:** This year, ETA is introducing a quarterly narrative report to standardize the quarterly submission. The narrative report includes information that cannot be collected through other reports, such as capacity building efforts like staff training, outreach activities, and promising practices that should be shared with other grantees as well as technical assistance needs. The Narrative Report is for all 72 grantees and the 14 discretionary grants for a total of 86 reports.
- **Equitable Distribution Report:** The Equitable Distribution (ED) Report has been changed from previously submitted versions to reflect that all of the data required for an analysis equitable distribution of resources is now provided to grantees on SCSEPED.org, an application that shows the number of authorized positions by county as determined by the Census data and the number of enrollments by county as determined by the data in SPARQ. The application also provides various calculations of the variance between the two. The data are presented in table form by county at both a state level (which includes all grantees that operate in a state) and the grantee level. Grantees using the revised 8705A and 8705B are now relieved of all data collection burden for the ED report and are only required to summarize the variance information

provided by SCSEPED.org and to answer two questions about the variance: what is its significance; and what, if any, actions the grantees will take to come into better compliance with the equitable distribution requirements. The data required by ETA 8705A and 8705B (Equitable Distribution Report) are obtained electronically by the grantees from SCSEPED.org and can be downloaded as an Excel-compatible spreadsheet. SCSEPED.org relieves grantees of the burden of collecting and analyzing equitable distribution and enrollment data for each county in which they operate.

- **Customer Satisfaction Surveys:** We are revising the additional questions in all three surveys for the first time since the surveys were introduced in 2004. The core questions that comprise the ACSI index are unchanged. The revisions reduce the total number of questions in the surveys, thus reducing the burden hours. (See Part B of the Supporting Statement for a discussion of customer satisfaction survey methodology.) The changes include:
 - o 9124a Participant Customer Satisfaction Survey: Questions 7, 8, 9, 20, and 21 were deleted; questions were added in positions 4, 8, 11, and 12; and questions 5, 18 and 20 had wording changes.
 - o 9124b Host Agency Customer Satisfaction Survey: Questions 4, 9, 13, 14, 15, 16, and 19 were deleted; questions were added in positions 7, 9, 11, and 14; and all other questions had wording changes.
 - o 9124c Employer Customer Satisfaction Survey: Question 4 was deleted, question 10 was added and the PRA language was revised in the footer on page 1.

16. For the collection of information results that will be published, outline plans for the tabulation, and publication. Address any complex analytic techniques that will be used.

SCSEP publishes the annual performance report (ETA 5140) of all grantees, as required by statute. SCSEP also makes its data made available on http://www.doleta.gov/Seniors/html_docs/GranteePerf.cfm in response to OMB's Open Government Directive, which has the goals of publishing government information on-line, improving the quality of government information, creating and institutionalizing a culture of open government, and creating an enabling policy framework for open government.

The State Plan is publicly presented for comment by individual states in accordance with each state's comment process. Such processes may include publication in local newspapers or on the state's Web site.

The quarterly and annual performance reports use no complex calculations. Results are generally tabulated as sums, averages, or percentage rates.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would not be appropriate.

ETA displays the OMB control number and the expiration date on all approved forms.

18. Explain any exceptions to the certification statement.

There are no exceptions.