

SUPPORTING STATEMENT

Youth CareerConnect (YCC) Grants Reporting and Recordkeeping Requirements

A. JUSTIFICATION

This is a justification for the Department of Labor (DOL) request to implement reporting and recordkeeping of the **Youth CareerConnect (YCC) Grants [SGA/DFA PY-13-01]**. This reporting structure features standardized individual data collection on program participants in both quarterly performance and narrative formats. All data collection and reporting will be done by grantee organizations (school district, workforce investment board, state or local government, not-for-profit, or faith-based and community organizations) or their sub-grantees.

DOL requests data collection from YCC grantees for the purpose of tracking grant progress and oversight of program performance reporting. This ICR requests the approval to create a Participant Tracking System (PTS) that will collect individual participant data, stored securely, and be used for both performance reporting and evaluation purposes.

DOL is requesting performance reports are submitted to DOL no later than 45 days after each calendar quarter.

Grantee quarterly reporting will consist of two parts:

1. Quarterly Performance Data Report
2. Quarterly Narrative Report

1. Quarterly Performance Data Reports will be collected from grantees using an online PTS data file upload system that will validate participant records and produce a Quarterly Performance Report form. This approach will address the Agency's goal of minimizing grantee burden and reporting errors.

Data validation will be required quarterly and consists of two parts:

1. **Data element validation** must be completed within 45 days after the performance reporting quarter ends and participant records are due to DOL.
2. **Report validation** should be performed prior to the submission of quarterly reports to DOL and must be submitted within 45 days after the quarter ends.

Data validation assesses the accuracy of data collected and reported to DOL on program activities and outcomes. Performance data will consist of participant demographics characteristics, types of services received, placements, outcomes and follow up status. Each requested data element can be reviewed in detail in Attachment A: *YCC Data Elements*.

2. In conjunction with performance data, DOL is requesting the collection of quarterly narrative reports that will provide a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter.

Both the Quarterly Performance and Narrative reports will be submitted to DOL on a quarterly basis. Specifically, these reports will reflect data on all individuals who receive a YCC grant-funded service necessary to ensure high school students gain the skills and competencies needed to increase their employability in in-demand industries and occupations. Reports will include data on services such as: education and training services; placements into unsubsidized employment, post-secondary education,

long-term occupational skills training, or Registered Apprenticeship; credential attainment of industry-recognized credentials, in a particular industry/occupation related; high school diplomas; and post-secondary credit.

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 DOL.

A.1. Circumstances Necessitating Data Collection

The **Youth Career Connect (YCC) Grants** are authorized under Section 414(c) of the American Competitiveness and Workforce Improvement Act of 1998 (ACWIA), as amended (29 U.S.C. 2916a) and are designed to support applicants in providing education, training, and job placement assistance in occupations and/or industries that have high-growth potential for which employers are using H-1B visas to hire foreign workers, and the related activities necessary to support such education, training, and placement activities.

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. If DOL does not comply with these requirements, funding for demonstration programs would be compromised. In applying for YCC grants, grantees agree to meet DOL's reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY-13-01), which requires the submission of quarterly reports within 45 days after the end of the quarter.

Laws Governing YCC Grants

The American Competitiveness and Workforce Improvement Act of 1998, Title IV, Section 414 (c), as amended by the Consolidated Appropriations Act of 2005, Division J, Title IV, Subtitle B, Section 428 directs the Secretary to require grantees to report on the employment outcomes obtained by workers receiving training under this subsection using indicators of performance that are consistent with other indicators used for employment and training programs administered by the Secretary.

Reports

Five outcome measures will be used to measure the overall success of the YCC grants:

Long-term measures:

- Final Program Retention Rate – the percentage of participants who complete the program, of those who enter the program;
- High School Diploma Attainment Rate – the percentage of participants who attain a high-school diploma;
- Credential Attainment Rate – the percentage of participants who attain an industry-recognized credential in the specified H-1B industry or occupation;
- Diploma and Credential Attainment Rate – the percentage of participants who attain a high-school diploma and credential in the specified H-1B industry or occupation; and
- Placement Rate – the percentage of participants who are placed in one of the following: unsubsidized employment, post-secondary education, occupational skills training, or Registered Apprenticeship (the performance report also will include separate counts of the number of participants who enter unsubsidized employment, enter post-secondary education, enter occupational skills training, and enter a Registered Apprenticeship).

In addition to the five outcome measures described above, grantees will report on a number of leading indicators that serve as predictors of success. These indicators include the following:

Short-term measures:

- Enrollment Rate – the number of participants enrolled in the program compared to the target number of participants identified in the grant application;
- Attendance Rate – the rate of school attendance by participants in the program;
- Chronic Absence Rate – the percentage of participants who have missed 10 percent of school days for any reason-excused or unexcused -- as well as suspensions;
- Mentoring Rate – percentage of participants who have matched mentors and participate in formal mentoring;
- Yearly Program Retention Rate – percentage of participants who continue in program from one school year to the next;
- Work Readiness Indicator – the percentage of participants who are deemed work ready based on an employer assessment conducted at the end of each internship/work experience (using the DOL-developed work readiness tool found at: <http://wdr.doleta.gov/directives/attach/TEGL/TEGL07-10a4.pdf>);
- Internship Placement and Completion Rates – the percentage of program participants who begin an internship and, of those who begin an internship, the percentage who complete;
- Post-Secondary Credit Attainment Rate – the percentage of participants who attain post-secondary education credit from courses taken during the program; and
- Average Post-Secondary Credit Hours Attained – the average number of post-secondary credits attained per participant while in the program.

In applying for the YCC grants, grantees and their sub-grantees agree to submit participant-level data and aggregate reports on participant characteristics, services provided, and outcomes to DOL on a quarterly basis. Grantees will collect and report quarterly YCC performance data using a newly developed Performance Tracking System (PTS) developed by the contractor, Mathematica Policy Research.

Grantee quarterly reports will consist of two parts:

1. **Quarterly Performance Data Report** – Individual participant-level data records submitted as a data file. A PTS will then aggregate the data and populate an OMB approved QPR Form with certified data.
2. **Quarterly Narrative Report** – Narrative account of grant-funded activities that occurred during the quarter. Grantees will describe program activities, accomplishments, progress and barriers to success. This information will be used to verify data and provide technical assistance where needed.

Both reports will be the basis for tracking the progress and performance of YCC grantees to ensure they are meeting their targets and provide technical assistance as needed.

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

Quarterly Reports

YCC grantees will be expected to implement new recordkeeping and reporting requirements with grant funds. Grant funds may also be used to upgrade computer hardware and Internet access to enable projects

to utilize the provided online Performance Tracking System (PTS) and enable grantees to accurately track participants.

Grantees will be required to track participant-level data on all individuals who receive grant-funded services through YCC program. These data will be used by DOL to assess performance and delivery of YCC program services. All data required for collection to inform these reports can be viewed in *Attachment A: YCC Data Elements*. This document outlines each data element including definitions and instructions on how to record each data element. Additional documents to support grantee reporting efforts will include the following:

- Youth CareerConnect Participant Tracking System: Manual for Participant Enrollment, Service Receipt and Outcomes Tracking, and Grantee-Level Data Entry
- Youth CareerConnect Aggregation Rules for Calculating the Quarterly Performance Report

DOL will use the grantee performance data to track grantee outcomes using the short and long-term measures described above. Participant data will also include: participant demographics; participant services; and short- and long-term outcomes. Within DOL, the data is used by the Employment and Training Administration and the Chief Evaluation Office within the Office of the Assistant Secretary for Policy.

The reports and other analyses of the data will 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 PTS information collection 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 authorization proceedings.

A.3. Use of Technology to Reduce Burden

Reports

To comply with the Government Paperwork Elimination Act, DOL is streamlining the collection of participant data and the preparation of quarterly reports to the extent feasible by providing a Web-based PTS and by providing uniform data elements and data definitions to grantees across DOL programs. All YCC data and reports will be submitted to DOL via an electronic reporting system (currently in development) that will concur with the above objective. Grantees will collect, retain, and report all information electronically through this system and will be provided comprehensive training on how to upload all reporting information, when and how.

A.4. Efforts to Identify Duplication

Reports

The Department holds grantees accountable by requiring them to identify and work toward comprehensive performance standards and establishing quarterly reports for competitive projects. The data items identified in *Attachment B: YCC QPR form* will be used to generate Quarterly Performance Reports.

DOL 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 services provided by multiple agencies to help participants prepare for job/education placement; and (2) better identify overlapping and

unproductive duplication of services. Information provided through the YCC PTS is not available through other data collection and report systems available to the Department.

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 sub-grantees are discussed in other sections of this supporting statement.

A.6. Consequences of Less-Frequent Data Collection

Reports:

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. If DOL does not comply with these requirements, funding for demonstration programs would be compromised. In applying for YCC grants, grantees agree to meet DOL’s reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY-13-01), which requires the submission of quarterly reports within 45 days after the end of the quarter.

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 60 day notice was published in the Federal Register on August 1, 2014^[1]. Comments were received from one entity. They are displayed in Table 1 below.

Table 1.

Comment Submitter	Comment Summary	DOL’s Response
Galveston Sustainable Communities Alliance and Galveston Independent School District	1. Adequately support a realistic estimate of annual burden hours; and 2. Promote sustainability of YCC programs beyond the grant term.	The burden hours have been adjusted based on a more realistic estimate of the number of participants that grants will serve and the data will be made available to the grants beyond the life of the grant term.

As part of the development of the Solicitation for Grant Applications for YCC grants the Federal agency partner, the U.S. Department of Education, was consulted with both providing feedback on data collection instruments, types of data collection, and the availability of data, as well as the overall program design for the YCC project.

A.9 Payments to Respondents

^{[1][1]} See: Federal Register Vol. 79, No. 148, p. 44867 published on Friday, August 1, 2014.

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

A.10. Confidentiality Assurances

Reports

While this information collection makes no express assurance of confidentiality, DOL is responsible for protecting the privacy of the YCC program participant's 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 and the Family Educational and Rights and Privacy Act (FERPA). This data is covered by a System of Records Notice, DOL/ETA-15, published April 8, 2002 (67 FR 16898 et seq). 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.

The YCC PTS will include a statement that informs the individual where the information he/she has provided is being stored, the name and location of the system, and that the information is protected in accordance with the Privacy Act. Any information that is shared or made public is aggregated by the PTS and does not reveal personal information on specific individuals.

Participant Data Collection

All information on individual participants will be entered into the PTS. All sensitive data will be encrypted and protected by Secure Socket Layer (SSL). Logging or output files will not contain sensitive data and will be limited to generic system and error data. Furthermore, data extracts for use by the evaluators will be available in files encrypted and available to team members on Relyon's File Transfer Protocol over SSL (FTPS) site.

The system will segregate user data into sensitive data, user-identifiable data, and project-specific data. Sensitive data will be stored in a separate database table containing a system-generated ID number in encrypted form. Sensitive data will be entered into the system but will at no point be displayed or downloadable by users of the system. User-identifiable data, including names and birth dates, will be stored separately from project-specific data and will be available for updating only by staff designated by the grantee or DOL. Participant data will be available to the project team in specific extracts and reports.

The PTS will be accessible only to staff who are currently working on the project. Staff access to participant-level data will be restricted. To access the PTS, users will first log on to their workstations and then to the PTS using a separate log-in prompt. The database will be encrypted at rest and removed and securely archived at the end of the data collection period. Upon completion of all the work under Youth Career Connect Grant Program, data collected in PTS will be completely purged from all data storage components.

A.11. Additional Justification for Sensitive Questions

Sensitive Questions for Performance Reports

While sensitive questions will be asked of participants in the proposed data collection, the privacy of participants will be protected as discussed in Section A.10. In addition, security will be built into the data collection system by the PTS contractor. As mentioned in Section A.10. DOL has strict protocol on protecting all Personally Identifiable Information (PII) and will ensure the PTS contractor will provide a data collection system that has the capacity to encrypt any PII submitted via the PTS. Participant responses to these sensitive questions will allow DOL and the contractors to comprehensively evaluate the effectiveness of the YCC program.

The PTS will collect background information on participants who have consented to participate in this evaluation. Information on date of birth, address, and telephone numbers is needed to identify and contact participants. The PTS also collects information on characteristics of participants, such as sex, race/ethnicity, education level, and work-related barriers—data used to create subgroups for the analysis, and to enhance the impact estimates. This type of information is generally collected as part of enrollment in government-funded training programs including the YCC program and is therefore not considered sensitive.

A.12. Estimates of the Burden of Data Collection

The annual national burden for YCC 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.

(1) Respondent Data Collection Burden

YCC respondent data collection burden considers the amount of participant and performance-related information collected and reported on the participant case 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 Federal reporting and evaluation requirements.

The data collection burden will vary by participant, based on the range and intensity of services provided by the grantee and its partners. For example, data collection may involve acquiring information from the various partners and partner agencies regarding employment training and placement, education and assistance, in addition to the collection of personal and demographic information and some evaluation data elements collected by the grantees themselves.

To arrive at the average annual figure of 2.67 hours per participant record, DOL assessed the time for entries based on scenarios postulating a variety of services possible for a range of anticipated participants. This information, in turn, was based on similar programs of this sort, including other employment and training programs. This figure is split between the data entry staff person (2.33 hours) and the participant orally providing data (0.33 hours).

Finally, DOL program managers consulted with grantees that have collected this sort of information over the past several years to verify that 2.67 hours is the average amount of time spent per record. YCC is expected to serve approximately 26,000 participants over the lifetime of the grants. To calculate total participant years and arrive at the annual frequency of response, we assumed that 6500 participants would be served each year. Therefore:

- In year one, 6500 participants will enroll and be tracked for four years = 26,000
- In year two, 6500 participants will enroll and be tracked for three years = 19,500
- In year three, 6500 participants will enroll and be tracked for two years = 13,000
- In year four, 6500 participants will enroll and be tracked for one year = 6500

This totals 65,000 participant-years, divided by 4 program-years of data collection gives you an average of 16,250 annual responses. If we use this average figure, 2.67 hours represents the best combined response estimate of time devoted to data entry for each participant, given the range of entries anticipated for each participant, as described above.

Table 1 – Data Collection Burden Hours

Activity	Estimated Number of Respondents	Annual Frequency of Response	Average Time per Respondent per once (in minutes)	Burden Hours per once	Annual Burden Hours	Annual Burden Hours Per Participant
Participant data collection (including evaluation data)	26,000	16,250	160	2.67	43,333	1.67
Quarterly Performance Report	24	4	240	4.00	384	16
Quarterly Narrative Report	24	4	600	10.00	960	40
Total	26,048	n/a	n/a	n/a	44,677	n/a

Data collection burden hours are based on consultation with similar programs that collect the same DOL required outcomes, along with modified elements that reflect specific YCC program outcomes.

Quarterly Performance and Narrative Progress Report Burden

The YCC quarterly performance report burden assumes that all grantees will use the PTS provided by the performance and evaluation contractor to generate quarterly performance reports. The PTS will be designed to apply edit checks to data files, based on participant records, to generate facsimiles of the aggregate information on enrollee characteristics, services provided, placements, and outcomes in quarterly a quarterly report format. The burden includes reviewing and correcting errors identified by the PTS for each participant record within the data file, generating, reviewing, and approving the aggregate QPR form. DOL assumes each grantee will spend approximately 4 hours per quarter preparing this report.

The YCC quarterly narrative performance 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. DOL assumes each grantee will spend approximately 10 hours per quarter preparing this report.

(2) Data Collection Cost Burden

Table 2 – Data Collection Cost Burden

Activity	Number of Respondents	Annual Burden Hours	Average Hourly Wage Rate*	Annual Cost Burden
Participant data collection	26,000	43,333	\$18.05	\$782,160.65
Quarterly Performance Report	24	384	\$18.05	\$6,931.20
Quarterly Narrative Report	24	960	\$18.05	\$17,328.00
Total				\$806,419.85

*Hourly rates used to calculate hourly costs depend upon the type of organization administering the program. The current minimum wage was used for participants' opportunity costs.

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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 Bureau of Labor Statistic's Social & Human Assistance Industry category (see the 2009 - 2011, National Compensation Survey, Bureau of Labor Statistics at: http://www.bls.gov/ncs/ncswage2010.htm#Wage_Tables).

The Federal minimum wage of \$7.25 has been used as an approximation of the value of participant time.

A.13. Estimated Cost to Respondents

- (1) **Start-Up/Capital Costs:** DOL will provide grantees with a free, Web-based, data collection and reporting system that grantees will use to collect and maintain participant data, apply edit checks to the data, and generate quarterly performance reports. The contractor will provide an online, web-based data collection and reporting system, PTS that grantees will use to collect and maintain participant data, apply edit checks to the data, and generate quarterly performance reports. There are no direct costs to respondents other than that of their time of participation, including in T attendance at PTS training sessions. DOL assumes that two individuals from each grantee will attend three one-hour training sessions.
- (2) **Annual Costs:** There are no annual costs, as DOL will be responsible for the annual maintenance costs for the free, Web-based data collection and reporting system.

A.14. Estimates of Annualized Costs to Federal Government

The total annualized cost to the federal government is \$144,548.44. Costs result from the following three categories:

- (1) **Start-Up/Capital Costs:** The start-up cost borne by DOL for the contractor to develop the new DOL on-line reporting system is estimated to be \$227,143. Annualized, this comes to \$75,714.33.
- (2) **Annual Costs:** The annual costs borne by DOL for the contractor to maintain the system and develop training and technical assistance guides is estimated to be \$50,184.
- (3) **Federal Staff Cost:** The annual cost borne by DOL for federal technical staff to oversee the contract is estimated to be \$18,650.11. We expect the annual level of effort to perform these duties will require 208 hours for one Washington D.C. based Federal GS 14 step 4 employee earning \$56.01 per hour. (See Office of Personnel Management 2014 Hourly Salary Table at http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/DCB_h.pdf). To account for fringe benefits and other overhead costs the agency has applied multiplication factor of 1.6 $208 \text{ hours} \times \$56.01 \times 1.6 = \$18,640$.

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 reports on a quarterly basis to DOL within 45 days of the end of each quarter. Quarterly report data will be analyzed by DOL staff and used to evaluate performance outcomes and program effectiveness.

Each quarter, DOL issues the Quarterly Workforce System Results. Data contained in the YCC PTS 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, as needed.

A.17. Approval Not to Display OMB Expiration Date

The expiration date for the OMB approval will be displayed.

A.18. Exceptions to OMB Form 83-I

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.