Supporting Statement, OMB Control No. 1205-0439, National Dislocated Worker Grants
(Previously, National Emergency Grants)

A. Justification

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 regulation mandating or authorizing the collection of information.

The information collection is necessary for the U.S. Department of Labor's (DOL's) award of National Dislocated Worker Grants (NDWGs) which are discretionary grants intended to temporarily expand the service capacity at the state and local area levels by providing funding assistance in response to significant dislocation events for workforce development and employment services and other adjustment assistance for dislocated workers and other eligible individuals as defined in the Workforce Innovation and Opportunity Act (WIOA) (P.L. 113-128); sections 113, 114 and 203 of the Trade Adjustment Assistance (TAA) Reform Act of 2002 (P.L. 107-210), as amended.

Funds are available for obligation by the Secretary under Sections 132 and 170 of the WIOA and Section 203 of the TAA Reform Act of 2002, as amended. Applications will be accepted on an ongoing basis as the need for funds arises at the state and local level.

The provisions of WIOA and the Regulations define two National Dislocated Worker Grant project types:

► REGULAR, which encompasses plant closures, mass layoffs, multiple layoffs in a single community, and higher than average demand from dislocated service members.

► DISASTER, which includes Federal Emergency Management Agency (FEMA)-declared emergency and disaster events, and emergencies or disaster situations of national significance.

Five electronic forms are employed by the NDWG program:

ETA 9103-1, Cumulative Planning Form (sometimes a customized variation is used – ETA 9103-2a, ETA 9103-2b, ETA 9103-3 or ETA 9103-4);
ETA 9104, Quarterly Report;
ETA 9105, Employer Data Form;
ETA 9106, Project Synopsis;
ETA 9107, Project Operator Data Form

2. Indicate how, 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.

For the application information collection, the purpose is to judge whether to approve an application requesting grant funds. Specifically, the purpose of the grant application forms is to provide the grant officer with the necessary information during the application review process to make consistent and objective funding decisions based on the stated funding request evaluation criteria.

For the quarterly reports information collection, the purpose is to assure accountability and to measure actual project performance to date.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

In compliance with the Government Paperwork Elimination Act, the information collection is fully in an electronic format. Electronic applications allow for ease of completion and timeliness of submission by the applicant, and timely processing of the application by the grant officer. E-applications are made through the DOL/ETA Grantee Reporting System Internet website for NDWGs: http://neg.doleta.gov/neg/. A User's Guide has been prepared for the e-application system. Moreover, to reduce the reporting burden for the applicants, as well as to ensure the completeness and consistency of the information provided, automated edit checks are programmed into the e-application system. The authorized signatory of the applicant is issued a unique Personal Identification Number (PIN). The entry of this PIN constitutes the authorized signature.

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 information collection avoids duplication because, although the eligible circumstances for NEG funding are of a recurring nature, the specific applications are unique. Therefore, the collected information will differ for each application. Moreover, the information collection will constitute the sole source of information for funding decisions regarding this assistance.

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

The information collection does not significantly impact small businesses or other small entities.

6. Describe the consequence to 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 burden.

Pursuant to the statutory rules and regulations relevant to the NDWG program, if the information collection is not performed, NDWG funds cannot be awarded or disbursed. The requested information collection has been designed in order to achieve compliance with those WIOA statutory rules and regulations.

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

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances concerning the information collected.

We do request that applications for NDWGs be completed and submitted as early as possible, in order to provide timely workforce development and employment services and other assistance to eligible individuals under the NDWG program.

8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

Concurrent with submission of this ICR submission, ETA issued a Notice of Proposed Rulemaking that provides a 60-day period for the public to comment on the proposed change to the collection of information. In addition, the NPRM instructed that comments on the information collections in the proposed rule could be sent directly to OMB during a 30-day period.

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

There will be no payments made, or gifts given, to respondents in association with the NDWEG program.

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

The information collection does not include confidential information, and therefore no assurances of confidentiality need to be provided to respondents.

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, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a private, sensitive nature asked in the information collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

The forms for this collection are:

ETA 9103/Planning Form, which provides cumulative quarterly estimates on project scope (e.g. number of participants, exits), design (e.g., mix of enrollments in activities), and use of funds (e.g. planned expenditures by type of program activity. [Most applicants will complete the ETA 9103-1. To accommodate specialized circumstances it is necessary to use customized versions of the 9103-1, which take the same amount of time to complete: ETA-9103-2a, ETA-9103-2b, ETA-9103-3, or ETA-9103-4.]

- ETA 9105/Employer Data Form provides employer and dislocation site-specific information needed to validate the eligibility of the dislocation event(s) and of the target group of workers affected for NEG assistance.

- ETA 9106/Project Synopsis Form summarizes key aspects of the proposed project, such as project type, type of eligible event, key contact information, planned number of participants, performance goals and historical and planned cost per participant levels.

- ETA 9107/Project Operator Data Form includes key contact and project scope information (e.g., number of participants, total budget, service area) for each Project Operator.

- ETA 9104 /Quarterly Reporting Form provides the Grant Officer with a quarterly record of actual project performance to date.

A reporting burden estimate table is shown below:

Estimated Total Annualized Hour Burden					
Reference	Expected Total Respondents*	Frequency	Expected Total Responses*	Avg. Time per Response	Expected Burden*
Narrative Summary	159	1 per project	159	60minutes	159 hours
ETA 9103-1	79	1 per project	79	90 minutes	118.5 hours
ETA 9103-2a	20	1 per project	20	90 minutes	30 hours
ETA 9103-2b	13	1 per project	13	90 minutes	19.5 hours
ETA 9103-3	59	1 per project	59	90 minutes	88.5 hours
ETA 9105	144	1 per project	144	30 minutes	72 hours
ETA 9106	159	1 per project	159	60 minutes	159 hours
ETA 9107	159	1 per project	159	15 minutes	39.75 hours
Reports: ETA 9104	159	quarterly per project	636	30 minutes	318 hours
Grant Modifications	159	1 per project	159	30 minutes	79.5 hours
Annualized Unduplicated TOTAL		n/a	1,587 responses	n/a	1,084hours
* Actual number will vary, because the information collection is required to obtain a benefit.					

Estimates of the total annualized hour burden and the annualized costs for the collection of this information are based upon the experience to date with NDWGs.

Mean hourly rate: $21.50 (Source: BLS Occupational Employment Statistics, "Employment and wages by major occupational groups, May 2014, "Community and social services occupations") http://www.bls.gov/oes/current/oes_nat.htm.

Annualized cost of hour burden: $22.71/hour x 1120 hours = $24,435.20.

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 start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no cost burden for reporting.

The amount of funding used for administrative costs for NDWGs, including operating and maintaining systems, is expected to vary among the NDWG recipients. In the NDWG application procedures, the Department provides that, generally, up to ten percent of the NDWG may be used for administrative costs.

14. Provide estimates of 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 (such as equipment, overhead, printing, and support staff),

and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimates of annualized cost to the Federal government for this collection are based upon experience to date with NDWGs. Operational expenses include maintaining and improving functionality of the electronic system for respondents and analyzing reports. These costs would total approximately $350,350 per year, which would include staff level costs averaged at the GS 13 step 5 level in Washington, DC, or an hourly rate of $49, for a combined total annualized hours of 7,150.
http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2015/general-schedule/

15. Explain the reasons for any program changes or adjustments.

The Workforce Innovation and Opportunity Act added one new type of applicant for grants under "regular" and one under “disaster.” We estimate a total of 9 additional grant submissions annually from these categories.

Also, the legislation that authorized the Health Coverage Tax Credit (HCTC) has expired. The tax credit is not available for tax years after 2013. Therefore ETA 9103-4 was removed. It accounted for 36 hours in estimated burden by 24 respondents/responses. Thus the responses are now 1,587 and the expected burden 1,084 hours.

While not affecting burden, the following is a summary of additional changes to the information collections. *See* “Supplementary Documents” on the “Information Collections” screen of the reginfo.gov database for track changes versions of the forms cleared under this ICR.

The Program name was changed from National Emergency Grants to National Dislocated Worker Grants (NDWG). This change is reflected on the Project Synopsis Form ETA 9106, Project Operator Data Form ETA 9107, Employer Data Form ETA 9105, Project Plan Form ETA 9103, and Quarterly Progress Report Form ETA 9104.

The Trade Health Insurance Coverage (Health Coverage Tax Credit, or HCTC) option was removed from the Project Synopsis Form ETA 9106 because the program expired January 1, 2014, along with the use of NDWG funds for HCTC grants. WIOA did not reauthorize use of NDWG funds for this purpose.

The Project Synopsis Form ETA 9106 adds a new type of “Regular” NDWG where there is a higher than average demand for services from Dislocated Service members and eligible spouses, and adds a new type of “Disaster” NDWG for events of national significance. For an emergency or disaster of national significance, the form now requires the date of the federal agency declaration and name of the federal agency, if other than the Federal Emergency Management Agency (FEMA). These new types of NDWGs are authorized under WIOA.

The Project Planning Form ETA 9103 provides a schedule and a plan for expenditure of grant funds and services to participants. The following updates have been made:

- Changed the label for Core and Intensive services is to Career Services, to reflect changes under WIOA.
- Replaced the term “Exit” with “Completed NDWG Services”. This change provides a clear distinction between Exit as defined in ETA guidance (TEGL 17-05) which includes all workforce services, and a participant completing only the services provided through this grant.
- Replaced the term “Entering Employment at Exit” with “Employed at Completion of NDWG Services”. Again, this distinguishes information specific to the grant project from overall workforce system outcomes.
- Added descriptive headings for each of the three sections for clarity.
- Added “Needs-Related Payments” for Dual-Enrollment projects, to align this project plan with the other project plan forms.
- Removed supportive services at the Grantee –level, as these services are provided at the project operator level. If in certain cases these services are funded by the grantee, the “other” field can capture this data.
- Removed “Other” planned grant expenditures once for the Grantee level, and the Project Operator level, to remove duplicative fields.
- Revised nomenclatures for various elements for consistency.
- Two fields capture work-based learning: “Participating in Work-Based Learning” and “Employment in Work-Based Learning at Completion of NDWG Services”. These elements were added under the Recovery Act, and with WIOA’s emphasis on work-based learning strategies, ETA will continue to collect this data.

The quarterly progress report, or QPR, also reflects the changes described above. The QPR is the reporting tool used by grantees to communicate progress toward the project plan. Additional changes made to the QPR (9104) ensure that it completely reflects the Planning Form (9103) for reporting purposes. The field for “Receiving Needs-Related Payments” was added to reflect the planning form. In addition, two lines labeled “Program Management and Oversight” that were not included on the planning form are removed from the QPR.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of the information collection will not be published.

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

ETA will display the OMB control number and expiration date.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methodology

This collection does not employ statistical methodology.