

**SUPPORTING STATEMENT**

WIOA Performance Management and Information and Reporting System  
(YouthBuild, National Farmworkers Jobs Program, Indian and Native Americans Program).

**OMB CONTROL NO. 1205-3NEW**

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary.**

This proposed information collection consolidates data collected under currently approved collections under: OMB 1205-0422, OMB 1205-0425, OMB 1205-0464. It also fulfills Workforce Innovation and Opportunity Act (WIOA) reporting requirements regarding the collection of performance indicators described in Sec. 116(b) (2)(A). Requirements for state level collection of this data for specific programs covered in this collection may be found below, based on WIOA and the associated NPRM.

ETA Program	WIOA Section	NPRM Section
Indian and Native American Program	166	§684.420, §684.610, §684.700, §684.800
Migrant and Seasonal Farmworker Programs	167	§685.210, §685.400
YouthBuild	171	§688.420, §688.610

WIOA performance indicators under Sec. 116(b) (2)(A) include:

- a) the percentage of program participants who are in unsubsidized employment during the second quarter after exit
- b) the percentage of program participants who are in unsubsidized employment during the fourth quarter after exit
- c) the median earnings of program participants who are in unsubsidized employment during the second quarter after exit
- d) the percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent (and have obtained or retained employment or are in an education or training program leading to a recognized postsecondary credential), during participation in or within 1 year after exit
- e) the percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment; and
- f) the indicators of effectiveness in serving employers

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information**

**that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

Data collected by this proposed collection is required to obtain or retain benefits (WIOA, sections 166, 167, and 171).

ETA uses the data collected to assess the effectiveness of ETA programs and to monitor and analyze the performance of its grantees.

This data collection format permits ETA to evaluate program effectiveness, monitor compliance with statutory limitations, and to analyze participant activity, while complying with OMB efforts to streamline Federal performance reporting.

Data collected through OMB 1205-3NEW will be made accessible to the public through an annual report published on [www.doleta.gov/performance](http://www.doleta.gov/performance). No personally identifiable information will be collected.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

The WIOA Performance Management and Information and Reporting System for YouthBuild, National Farmworkers Jobs Program, and Indian and Native Americans Program would standardize the quarterly and annual reporting processes for program participants.

**4. Describe efforts to identify duplication.**

This new information collection will consolidate the existing information collections for YouthBuild, National Farmworkers Jobs Program, Indian and Native Americans Program participants. These information collections are currently approved under OMB Control Numbers 1205-0422, 1205-0425, and 1205-0464. Once this information collection request is approved and WIOA is fully implemented, the Department will submit requests to discontinue these three information collections.

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

This data collection does not impact significantly on small entities. Grantees must secure, however, the necessary data from all subrecipients to roll into grantee level required reporting formats.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Failure to collect this required performance data, and/or to collect it less frequently than annually, would violate the ETA program statutes, regulations, and/or individual grant agreements. In

particular, ETA must report to Congress annually on WIOA-stipulated performance data, including compliance with prescribed limitations.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

There are no special circumstances.

**8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments.**

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. Training and technical assistance will be provided to grantee personnel who are, or in the future may be, involved in ETA performance reporting.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

There are no payments or gifts to respondents other than remuneration of contractors or grantees.

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

This collection of information does not include confidential information.

**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.**

There are no questions of a sensitive nature.

**12. Provide an estimate in hours of the burden of the collection of information.**

The annual national burden for the consolidated information collections for YouthBuild, National Farmworkers Jobs Program, Indian and Native Americans Program participants is calculated based on the number of individual participant responses, the time it takes each grantee to complete and submit required reports, and the costs incurred by each program to complete the collection and submission process.

<b>PROGRAM</b>	<b>Number of Respondents Annually</b>	<b>Total Estimated Number of</b>	<b>Average Hours Per</b>	<b>Annual Burden Hours</b>
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		Annual Responses	Response	
<b>National Farmworker Jobs Program</b>	<b>52</b>	<b>29,949</b>	<b>2.5</b>	<b>74,267</b>
<b>Division of Indian &amp; Native Americans Program</b>	<b>115</b>	<b>28,110</b>	<b>1.9</b>	<b>53,611</b>
<b>YouthBuild</b>	<b>210</b>	<b>4,705</b>	<b>7.2</b>	<b>33,495</b>
<b>TOTAL</b>	<b>377</b>	<b>2,733</b>		<b>161,373</b>

The annual burden hours were determined based on the estimated number of annual participant responses per program and the average amount of time necessary to complete each response. The number of respondents for each program was determined based on the number of grantees or states submitting annual reports to the Department of Labor. The estimated number of annual responses has been revised since the completion of the Notice of Proposed Rulemaking to more accurately reflect the expected sum of participant responses.

<b>PROGRAM</b>	<b>Number of Respondents</b>	<b>Total Burden Hours</b>	<b>Applicable Hourly Rate</b>	<b>Total Burden Cost</b>
<b>National Farmworker Jobs Program</b>	<b>52</b>	<b>74,267</b>	<b>\$15.34</b>	<b>\$1,139,255.80</b>
<b>Division of Indian &amp; Native Americans Program</b>	<b>115</b>	<b>53,611</b>	<b>\$25.50</b>	<b>\$1,367,080.50</b>
<b>YouthBuild</b>	<b>210</b>	<b>33,495</b>	<b>\$14.61</b>	<b>\$489,362</b>
<b>TOTAL</b>	<b>377</b>	<b>161,373</b>	<b>-</b>	<b>\$2,995,698.30</b>

The annual burden cost has been calculated based on each program's total burden hours and the applicable hourly cost for staff services. The National Farmworkers Jobs Program determined their hourly rate based on the average hourly earnings in the U.S. Department of Labor Bureau of Labor Statistics Social Assistance industry category or subsector (NAICS 624). For the Indian and Native American Program, the hourly rates used to calculate cost are the average hourly earnings in the Bureau of Labor Statistics' management analyst occupational category within state and local government. Hourly rates used to calculate cost for YouthBuild 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.

The Hours per Respondent is the estimated amount of time it will take each state or grantee to collect all required information and complete performance reports by the established date of submission.

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).**

There are no other costs.

**14. Provide estimates of annualized cost to the Federal government.**

A preliminary estimate of the cost for the development of the software needed to accept these reports is \$750,000. This includes programmatic changes to the individual record layouts required under WIOA, creation of new and/revised reporting templates, and consolidation of existing reporting systems.

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

OMB 1205-3NEW would not increase burden hours because it would consolidate information collections from three currently approved information collections: OMB 1205-0422, OMB 1205-0425, OMB 1205-0464.

OMB Approval No.	Burden hours currently	Burden hours proposed	Change
1205-3NEW	161,373	161,373	0

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

Report results will appear in an annual report that will be provided to Congress and published on [www.doleta.gov/performance](http://www.doleta.gov/performance). Result tabulation will include a state and national disaggregation by program. Annual report generation will occur within a federally-maintained information management system to ensure uniform calculations across programs and across grantees. National reports will include individual statewide information within it.

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

The expiration date will be included on the forms associated with this ICR.

**18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

There are no exceptions.

## **B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

The collection does not employ statistical methods.