

SUPPORTING STATEMENT

WIOA Performance Management and Information and Reporting System for Core Programs WIOA Core Program Performance Report and Eligible Training Provider Report **OMB CONTROL NO. 1205-0420**

This information collection request (ICR) is being submitted in conjunction with the publication of proposed regulations to implement the Workforce Innovation and Opportunity Act (WIOA). The Departments of Education and Labor (hereafter referred to as “the Departments”) ask that OMB file comments on this ICR, as public comments are likely.

A. JUSTIFICATION

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

The two data collections proposed under OMB 1205-0420 are designed to fulfill requirements in WIOA Sec.116(d)(1) for the development of report templates for the State Performance Report for WIOA core programs, and the Eligible Training Provider Report.

Section 116 of WIOA requires core programs of the workforce development system to comply with common performance accountability requirements. As such, core programs must submit common performance data to demonstrate that specified performance levels are achieved. The common performance data will be submitted through OMB 1205-0420.

In addition, OMB 1205-0420 will collect information specific to eligible training providers who receive funds from Adult and Dislocated Worker programs authorized under title I of WIOA.

WIOA CORE PROGRAM PERFORMANCE REPORT

WIOA Sec. 116(d)(2)—“Contents of State Performance Reports”— mandates the collection of specific data at a state level from WIOA core programs (the Adult, Dislocated Worker, and Youth programs under Title I; the Adult Education and Family Literacy Act program under Title II; the Wagner-Peyser Act program under Title III; and the Vocational Rehabilitation program under Title IV). Corresponding proposed regulations for these data collection requirements, including which primary performance indicators apply for each core program, may be found in Notices of Proposed Rulemaking (NPRMs) related to: 20 CFR part 680 (Adult and Dislocated Workers); 20 CFR part 681 (Youth); 20 CFR part 652 (Wagner-Peyser); 34 CFR parts 462 and 463 (Adult Education and Family Literacy Act); and 34 CFR part 361 (Vocational Rehabilitation). Required annual data for the core programs include those related to primary performance indicators, participant counts and costs, and barriers to employment as described below.

Primary Performance Indicators for Core Programs

For WIOA core programs, States must report the results of primary performance indicators set forth at WIOA Sec. 116(b)(2)(A)(i)(I)-(VI):

1. the percentage of program participants who are in unsubsidized employment during the second quarter after exit;
2. the percentage of program participants who are in unsubsidized employment during the fourth quarter after exit;
3. the median earnings of program participants who are in unsubsidized employment during the second quarter after exit;
4. 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;
5. 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
6. the indicators of effectiveness in serving employers.

Participant Counts and Cost Information

7. The number of participants served by each of the core programs;
8. The number of participants who received career services during the most recent program year and the three preceding program years;
9. The number of participants who received training services during the most recent program year and the three preceding program years;
10. The amount of funds spent on career services;
11. The amount of funds spent on training services;
12. The number of participants who exited from career and training services, respectively, during the most recent program year and the three preceding program years;
13. The average cost per participant of those participants who received career and training services, respectively, during the most recent program year and the three preceding program years;
14. The percentage of participants in a program authorized under title I programs who received training services and obtained unsubsidized employment in a field related to the training received;
15. The number of participants who are enrolled in more than 1 of the core programs; and
16. The number of individuals with barriers to employment served by each of the core programs, disaggregated by each subpopulation of such individuals.

Barriers to Employment

Data must be collected in a manner so that the results may be disaggregated by “Individuals with Barriers to Employment,” as defined in WIOA Sec. 3(24), for both number of participants served and performance on primary indicators, and then further disaggregated by age, race, and gender. Under WIOA Sec. 3(24), an “individual with a barrier to employment” includes:

17. Displaced homemakers;
18. Low-income individuals;
19. Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166 of WIOA;

20. Individuals with disabilities, including youth who are individuals with disabilities;
21. Older individuals;
22. Ex-offenders;
23. Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));
24. Youth who are in or have aged out of the foster care system;
25. Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers;
26. Eligible migrant and seasonal farmworkers, as defined in section 167(i) of WIOA;
27. Individuals within two years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.);
28. Single parents (including single pregnant women);
29. Long-term unemployed individuals; and
30. Such other groups as the Governor involved determines to have barriers to employment.

WIOA ELIGIBLE TRAINING PROVIDER REPORT

WIOA Sec. 116(d)(4)—“Contents of Eligible Training Provider Report” (in 20 CFR Part 677 of the NPRM)—mandates the collection of specific information for each program of study for each eligible provider of training services under Title I Adult and Dislocated Worker programs. Required data must include those related to primary performance indicators, participant counts and costs, and barriers to employment as described below.

Primary Performance Indicators for the WIOA Title I Eligible Training Provider Report

1. the percentage of program participants who are in unsubsidized employment during the second quarter after exit;
2. the percentage of program participants who are in unsubsidized employment during the fourth quarter after exit;
3. the median earnings of program participants who are in unsubsidized employment during the second quarter after exit;
4. 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 one year after exit;

Participant Counts and Cost Information

5. The number of participants served by Title I – Adult, Dislocated Worker, and Youth
6. The number of participants who received career services during the most recent program year and the three preceding program years;
7. The number of participants who received training services during the most recent program year and the three preceding program years;
8. The amount of funds spent on career services;

9. The amount of funds spent on training services;
10. The number of participants who exited from career and training services, respectively, during the most recent program year and the three preceding program years;
11. The average cost per participant of those participants who received career and training services, respectively, during the most recent program year and the three preceding program years;
12. The percentage of participants in a program authorized under Title I programs who received training services and obtained unsubsidized employment in a field related to the training received;
13. The number of participants who are enrolled in more than 1 of the core programs; and
14. The number of individuals with barriers to employment served by each of the core programs, disaggregated by each subpopulation of such individuals.

Barriers to Employment

Data must be collected in a manner so that the results may be disaggregated by “Individuals with Barriers to Employment,” as defined in WIOA Sec. 3(24), for both number of participants served and performance on primary indicators, and then further disaggregated by age, race, and gender. Under WIOA Sec. 3(24), an “individual with a barrier to employment” includes:

15. Displaced homemakers;
16. Low-income individuals;
17. Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166 of WIOA;
18. Individuals with disabilities, including youth who are individuals with disabilities;
19. Older individuals;
20. Ex-offenders;
21. Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));
22. Youth who are in or have aged out of the foster care system;
23. Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers;
24. Eligible migrant and seasonal farmworkers, as defined in section 167(i) of WIOA;
25. Individuals within two years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.);
26. Single parents (including single pregnant women);
27. Long-term unemployed individuals; and
28. Such other groups as the Governor involved determines to have barriers to employment

ONGOING REPORTING BASED ON CURRENTLY APPROVED 1205-0420

Information is collected through the WIA management information and reporting system under the following authority:

WIA section 136 establishes the performance and accountability requirements for WIA Adult, Dislocated Worker, and Youth programs. The purpose of section 136 is to establish a comprehensive performance accountability system, comprised of the activities described in this section, to assess the effectiveness of states and local areas in achieving continuous improvement of workforce investment activities funded under this subtitle, in order to optimize the return on investment of Federal funds in statewide and local workforce investment activities (section 136(a)).

Further, section 136(d) outlines the minimum requirements for the WIA annual reports that states must submit to DOL. The annual reports must reflect:

- The progress of the state in achieving state performance measures, including information on the levels of performance achieved by the state with respect to the core indicators of performance and the customer satisfaction indicator;
- The progress of local areas in the state in achieving local performance measures, including information on the levels of performance achieved by the areas with respect to the core indicators of performance and the customer satisfaction indicator;
- Information on the entry by participants who have completed training services provided under section 134(d)(4) into unsubsidized employment related to the training received;
- Data on the wages at entry into employment for participants in workforce investment activities who entered unsubsidized employment, including the rate of wage replacement for such participants who are dislocated workers;
- Information on the retention and earnings received in unsubsidized employment 12 months after entry into employment;
- A description of performance with respect to the indicators of performance specified in WIA section 136(b)(2)(A) (core indicators of performance) of participants in workforce investment activities who received the training services compared with the performance of participants in workforce investment activities who received only services other than the training services (excluding participants who received only self-service and informational activities); and
- A summary of performance with respect to the indicators of performance specified in WIA section 136(b)(2)(A) (core indicators of performance) of recipients of public assistance, out-of-school youth, veterans, individuals with disabilities, displaced homemakers, and older individuals.

Sections 172, 185, and 189 provide broad authority to the Secretary of Labor to address performance and accountability issues for all programs authorized under title I. Section 136 specifically addresses performance and accountability for the WIA Adult, Dislocated Worker (DW), and Youth programs.

WIA section 172 directs the Secretary to provide for the continuing evaluation of programs and activities authorized under title I, including demonstration grants. WIA section 172(a) specifies that the evaluations must address:

- General effectiveness of such programs and activities in relation to their cost, including the extent to which the programs and activities improve the employment competencies of participants in comparison to comparably-situated individuals who did not participate in such programs and activities and, to the extent feasible, increase the level of total employment over

- the level that would have existed in the absence of such programs and activities;
- Effectiveness of the performance measures relating to such programs and activities;
- Effectiveness of the structure and mechanisms for delivery of services through such programs and activities;
- Impact of the programs and activities on the community and participants involved;
- Impact of such programs and activities on related programs and activities;
- Extent to which such programs and activities meet the needs of various demographic groups; and
- Such other factors as may be appropriate.

WIA section 185 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 (WIA section 185(d)(2));
- Direct each state, each Local Board, and each 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 (WIA section 185(c)(2));
- Require that recipients of funds under title I of WIA 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 of WIA (section 185(a)(2));
- Compel states to submit to the Secretary, on a quarterly basis, a summary of the reports submitted to the Governor under WIA sections 185(e)(1) and 185(e)(2);
- Specify that the reports shall include information about programs and activities carried out under title I of WIA 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 (section 185(d)(1) (a-e)).

WIA section 189 requires the Secretary to prepare and submit to Congress an annual report regarding the programs and activities carried out under title I of WIA. The report must include:

- A summary of the achievements, failures, and problems of the programs and activities in meeting the objectives of WIA title I;
- A summary of major findings from research, evaluations, pilot projects, and experiments conducted under WIA 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

- 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.**

States and eligible training providers must submit the required data collected by these proposed ICRs to obtain or retain Federal funding (WIOA section 116).

The Departments will use the data collected to assess the effectiveness of WIOA's core programs and to monitor and analyze the performance of their grantees.

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

Data collected in both the WIOA Core Program Performance Report and WIOA Eligible Training Provider Report will be made accessible to the public through an annual report published on: www.doleta.gov/performance (the Adult, Dislocated Worker, and Youth programs under Title I and the Wagner-Peyser Act program under Title III); www.rsa.ed.gov/ (the Vocational Rehabilitation Services program under Title IV); and <http://www.ed.gov/about/offices/list/ovae/resource/index.html> (the Adult Education and Family Literacy Act program under Title II).

- 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.**

States will collect participant data through electronic means. State reports will be submitted electronically through portals established by the Departments.

- 4. Describe efforts to identify duplication.**

This proposed information collection would be in addition to existing program-specific collections under approved OMB Control Numbers/Report titles described in more detail below. The proposed information collection would incorporate only those data elements that are common to all core programs and required by section 116 of WIOA. The Departments are collaborating to develop common definitions across programs in order to further reduce the chances of duplicative reporting.

The WIOA Eligible Training Provider Report is a new collection and, therefore, is not duplicative of any existing information collection.

Information collection burdens associated with this proposed information collection represent only the burden associated with reporting the new common performance data elements by the core programs and information collections that will be continued and are currently approved under control number 1205-0420. This ICR does not reflect any burden associated with existing data

collections that will continue separate and distinct and are currently approved under other control number.

The currently-approved program-specific data reporting that will continue, as applicable, in addition to the common data ICR discussed herein, for the core programs include:

- Control Number 1205-0420, Workforce Investment Act Management Information and Reporting System, with an annual burden of 508,589 hours (discussed in the last paragraph);
- Control Number 1205-0240, Labor Exchange Reporting System, with an annual burden of 568,192 hours;
- Control Number 1830-0027, Measures and Methods for the National Reporting System for Adult Education, with an annual burden of 5,700 hours; and
- Control Number 1820-0508, RSA-911 Case Service Report, with an annual burden of 6,500 hours.

The Departments anticipate that some of the above collections may be phased out or modified, as appropriate, as the WIOA performance measures are fully implemented.

The above-described currently-approved reporting burdens are presented here in order to provide respondents full transparency of the complete reporting burden that is imposed by WIOA, both in terms of the new common performance data elements as well as program-specific reporting requirements. However, to be clear, the net new burden of 2,351,905 hours listed in the NPRM only reflects the additional burden imposed by the new common performance reporting requirements, set forth at sec. 116 of WIOA, that are applicable to all core programs.

Note that WIOA requirements that are part of the proposed 1205-0420 overlap with currently approved information collections under 1205-0420, which collects data for Title I Adult and Dislocated Worker Programs and which expires on 5/31/2016. A portion of this data that is not specific to WIOA will continue to be collected in the proposed collection. Thus, where applicable, responses to questions that apply to currently approved burden may be broken out based on what is proposed for WIOA requirements and what is not required under WIOA but is part of a continuing or ongoing collection per 1205-0420.

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 sub-recipients, as applicable, to incorporate into grantee-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 the required performance data, and/or to collect it less frequently than annually, would violate WIOA and its implementing regulations. Such failure could impact a State's receipt of Federal funds under WIOA. Moreover, such failure could impede the Departments' efforts to

ensure compliance with Federal performance requirements, thereby affecting the Departments' ability to safeguard the Federal interest.

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.**

In conjunction with this ICR submission, the Departments issued an NPRM that provides a 60-day period for the public to comment on the proposed information collection changes necessitated by WIOA for the core programs and eligible training providers. 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.

The Departments will provide training and technical assistance on WIOA reporting requirements to grantees.

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 information collection of the common performance accountability data is calculated across core programs based on the number of participants, the time it takes each respondent to complete and submit its report, and the costs incurred by each program to complete the collection and submission process. The core programs that will collect standardized data elements using this common collection method include WIOA adult and dislocated workers, youth, Wagner-Peyser, Adult Education and Family Literacy Act, and Vocational Rehabilitation

programs. The burden for the Eligible Training Provider data collection and reporting is also included as a separate set of tables within this burden estimate.

Table 1: WIOA Core Program Performance Report Burden Estimate (Hours)

PROGRAM	Number of Respondents Annually	Total Estimated Number of Annual Responses	Minutes Per Record	Annual Burden Hours
Adult & Dislocated Worker	53	1,875,440	10.5	328,202
Youth	53	102,723		77,042
Wagner-Peyser	53	14,176,680	2.5	590,695
Adult Education	57	1,667,156	15	416,789
Vocational Rehabilitation	80	596,085	90	894,127
TOTAL	137	18,418,084		2,306,855

The total number of unique respondents (137) in Table 1 is based on the *sum* of the following numbers:

- 53 States (as defined in WIOA Sec. 3(56))
- 4 outlying areas (as defined in WIOA Sec. 3(45)(A))
- 80 state agencies (specific to Vocational Rehabilitation)

Total – 137 respondents annually

The annual burden hours were determined based on the estimated number of annual participant responses per program (the total estimated number of annual responses) and the average number of minutes necessary to collect the required data for each person’s individual record (minutes per record). For example, by multiplying the Wagner-Peyser program’s total estimated number of annual responses (14,176,680) by their

minutes per record (2.5) and dividing the product by the 60 minutes that make up an hour, an annual burden of 590,695 hours is calculated.

Because each DOL and Vocational Rehabilitation respondent reports 5 times per year (quarterly plus annually, at 53 and 80 respondents per year respectively); and each Adult Education respondent reports only annually (at 57 respondents per year), the total estimated number of annual responses for all WIOA core programs is 722 as noted in the joint NPRM.

Table 2: WIOA Core Program Performance Report Burden Estimate (Costs)

PROGRAM	Number of Respondents Annually	Total Burden Hours	Applicable Hourly Rate	Total Burden Cost
Adult & Dislocated Worker	53	328,202	\$25.50	\$8,369,146
Youth	53	77,042	\$25.50	\$1,964,577
Wagner-Peyser	53	590,695	\$25.50	\$15,062,723
Adult Education	57	416,789	\$25.50	\$10,628,120
Vocational Rehabilitation	80	894,127	\$33.63	\$30,069,491.10
TOTAL	137	2,306,855		\$66,094,056.00

The annual burden cost provided in Table 2 has been calculated based on each program’s total burden hours and the applicable hourly cost for staff services. The WIOA adult and dislocated workers, youth, Wagner-Peyser, and Adult Education and Family Literacy Act programs calculate their hourly rate as \$25.50, the estimated average hourly earnings for state-run programs according to the State Government, North American Industry Classification System (NAICS) code 926110 ‘Administration of general economic programs, All States and US’ 2013 Annual Averages, Quarterly Census of Employment and Wages - Bureau of Labor Statistics (http://www.bls.gov/cew/apps/table_maker/v3/table_maker.htm?type=0&year=2013&qtr=A&own=2&ind=926110&supp=0).

The Vocational Rehabilitation Services program uses the hourly wage for Database Administrators (15-1141) who fall under NAICS code 999200 - State Government, excluding schools and hospitals (OES Designation http://www.bls.gov/oes/current/naics4_999200.htm#15-0000), which is \$33.63, to account for the IT related responsibilities necessary to support their reporting process. By multiplying the total burden hours of a given program by their applicable hourly rate, the total

burden cost can be calculated. For example, the total burden hours of RSA (894,127) times their hourly rate (\$33.63) determines their total burden cost of \$30,069,491.10.

Table 3: WIOA Eligible Training Provider Report Burden Estimate (Hours)

PROGRAM	Number of Respondents Annually	Total Estimated Number of Annual Responses	Minutes per Record	Annual Burden Hours
Eligible Training Providers	57	11,400	237.1 minutes divided by 60 = 3.9517 hours	3.9517 hours x 11,400 responses = 45,050

The annual burden hours for Eligible Training Providers Reporting were determined based on the estimated number of training providers (the total estimated number of annual responses) and the average number of minutes necessary to collect the required data from each service provider and report it (minutes per record). The total estimated number of annual responses was determined based on an estimated 200 training providers per state across 57 states and outlying areas. The annual hour burden is determined by multiplying the Eligible Training Providers annual participant count (11,400) by 3.9517 hours per record for an estimated annual burden of 45,050 hours (rounded).

Table 4: WIOA Eligible Training Provider Report Burden Estimate (Costs)

	Number of Respondents	Total Burden Hours	Applicable Hourly Rate	Total Burden Cost
Eligible Training Providers	57	45,050	\$33.63	\$1,515,032

The annual burden cost for Eligible Training Providers reporting is calculated by multiplying the total burden hours (45,050) by the applicable hourly rate of \$33.63. The total burden hours of 45,050 times the hourly rate of \$33.63 produces a total burden cost of \$1,515,031.50.

The Eligible Training Provider hourly rate was determined based on the hourly wage for Database Administrators (15-1141) who fall under NAICS code 999200 - State Government, excluding schools and hospitals (OES Designation http://www.bls.gov/oes/current/naics4_999200.htm#15-0000, which is \$33.63, to account for the IT related duties necessary to collect and maintain reporting data.

Table 5: Total Burden Hours and Cost for OMB 1205-0420

Row	Report	Total Respondents	Total Burden Hours	Total Burden Cost
1	Current OMB: 1205-0420 (non-WIOA)		250,131	\$0
2	WIOA Core Program Performance Report	137	2,306,855	\$66,094,056
3	WIOA Eligible Training Provider Report	57	45,050	\$1,515,032
4	TOTAL	137	2,602,036	\$67,609,088.00

Row 1 of the *Table 5: Total Burden Hours and Costs for 1205-0420* summarizes additional burden that must be accounted for regarding data collected in the currently approved 1205-0420, which comprises:

- Non-WIOA data that will continue to be collected as part of the proposed 1205-0420, and which is
- Distinct from the burden accounted for in rows 2 (WIOA Core Program Performance Report) and 3 (WIOA Eligible Training Provider Report)

Total Unique Respondents

The total number of unique respondents provided above reflects the *sum* of:

- Rows 1 and 2 - the number of unique respondents for non-WIOA data in combination with those of the WIOA Core Program Performance Report. This number mirrors the total unique respondent count from *Table 1: WIOA Core Program Performance Report Burden Estimate (Hours)*, because the respondents in row 1 are a subset of the respondents in row 2.
- Row 3 – the number of unique respondents represented in *Table 3: WIOA Eligible Training Provider Report (Hours)*

Total Burden Hours

Half of the data and associated burden which is currently approved under 1205-0420 for Title I Adult and Dislocated Worker Programs will continue to be collected in the proposed collection. This additional burden has been calculated as follows:

- 500,261 hours (total burden hours currently approved under 1205-0420)

- *divided by 2*

results in a *quotient* of 250,130.5 hours.

When *adding* burden hours from rows 1, 2, and 3, includes:

- 250,130.5 hours - detailed directly above
- 2,306,855 hours - Total hours from *Table 1: WIOA Core Program Performance Report Burden Estimate (Hours)*
- 45,050 hours – Total hours from *Table 3: WIOA Eligible Training Provider Report Burden Estimate (Hours)*

The resulting *sum* of 2,602,035.50 hours represents the total hour burden for proposed 1205-0420.

Total Burden Costs

When *adding* burden hours from rows 1, 2, and 3, including:

- \$66,094,056 - Total costs from *Table 2: WIOA Core Program Performance Report Burden Estimate (Costs)*
- \$1,515,032 - Total costs from *Table 4: WIOA Eligible Training Provider Report Burden Estimate (Costs)* total
- The resulting sum is \$67,609,088.00

Burden Hours Reported in NPRM vs. Total Burden for 1205-0420

As stated response to number 1, the estimated burden hours provided in the NPRM represent the “net” burden reflecting additional burden imposed by WIOA requirements. Thus, the 2,351,905 burden hours reported in the NPRM does not account for the “current” burden hours that are unrelated to WIOA, but that will continue under the proposed 1205-0420. Thus, the relationship between the NPRM burden hours provided for 1205-0420, and the total burden hours submitted in this proposed collection for 1205-0420, may be understood as follows:

- 2,351,905 hours (WIOA related burden) *plus*
- 250,130.5 hours (non-WIOA related burden from currently approved collection) *equals*
- 2,602,035.50 hours (total burden hours in proposed 1205-0420)

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.

Based on previously estimated software development costs for the programs listed below, and considering the changes required by WIOA and the proposed regulations, a preliminary estimate of the cost for the development of the software needed to accept these reports for the Departments is \$2,318,925, including:

- \$750,000 for the Adult and Dislocated Worker programs under Title I and Wagner-Peyser programs under Title III (Employment and Training Administration of the Department of Labor);
- \$1,500,000 for the Adult Education and Family Literacy Act program under Title II (The Office of Career, Technical and Adult Education of the Department of Education);
- \$68,925 for Vocational Rehabilitation under Title IV (Rehabilitation Services Administration of the Department of Education).

Based on previous estimates for federal oversight, it is estimated that, on average, 5 GS-13s and 4 GS-14s will spend a total of 160 hours annually on oversight of each of the three core programs specified above. Assuming pay at the [GS-13 and GS-14 Step 4 level for the Washington D.C. Metro Area](#) for 2015 is \$47.87 and \$56.57, respectively, per hour and increasing this by a factor of 1.69 to reflect total compensation costs, including insurance contributions, (total \$80.90 for GS-13s and \$95.60 for GS-14s), the Federal oversight costs are estimated to result in a preliminary annualized cost of $(5 \times 3 \times 160 \times \$80.90) + (4 \times 3 \times 160 \times \$95.60) = \$377,712$.

TOTAL: \$2,318,925 initial development costs + initial \$377,712 federal oversight costs = \$2,696,637.

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

The proposed changes from the existing reporting requirements to the new reporting requirements are further explained in NPRMs related to: 20 CFR part 680 (Adult and Dislocated Workers); 20 CFR part 681 (Youth); 20 CFR part 652 (Wagner-Peyser); 34 CFR parts 462 and 463 (Adult Education and Family Literacy Act); and 34 CFR part 361 (Vocational Rehabilitation). They will also be explained in more detail in a forthcoming information collection notice that will give states further guidance as they prepare to implement new reporting requirements.

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

WIOA CORE PROGRAMS PERFORMANCE REPORT

Annual Report to be provided to Congress and the public via the Departments' websites will be tabulated in a manner that corresponds to WIOA Sec. 116(d)(2)(A)-(J):

- A. Information specifying the levels of performance achieved with respect to primary indicators of performance for WIOA Youth, WIA Adult, Wagner Peyser, Adult Education and Family Literacy Act, and the Vocational Rehabilitation programs, and the state adjusted levels of performance with respect to such indicators for each program.
- B. Information specifying the levels of performance achieved with respect to the primary indicators of performance for WIOA Youth, WIA Adult, Wagner Peyser, Adult Education and Family Literacy Act, and the Vocational Rehabilitation programs with respect to individuals with barriers to employment, disaggregated by the following subpopulations: poor work history, lack

of work experience, lack of educational or occupational skills attainment, dislocation from high-wage and high benefit employment, low levels of literacy or English proficiency, disability status, homelessness, ex-offender status, and welfare dependency of such individuals, and by race, ethnicity, sex and age.

- C. The total number of participants served by each core program.
- D. Number of participants who received career and training services, respectively, during the most recent program year and the three preceding program years and the amount of funds spent on each type of service.
- E. The number of participants who exited from career and training services, respectively, during the most recent program year and the three preceding program years.
- F. The average cost per participant of those participants who received career and training services, respectively, during the most recent program year and the three preceding program years.
- G. The percentage of participants in a program who received training services and obtained unsubsidized employment in a field related to the training received.
- H. The number of individuals with barriers to employment served by each program disaggregated by each subpopulation.
- I. The number of participants enrolled in more than one core program.
- J. The percentage of the state's annual allotment that the state spent on administrative costs.

WIOA ELIGIBLE TRAINING PROVIDER REPORT

States will provide web addresses to DOL that will in turn be made available in DOL's Annual Report to Congress. These web addresses shall lead to data reported by each eligible provider of training services under WIOA Sec. 122, with respect to each program of study, in a manner that is tabulated as described in WIOA Sec. 116(d)(4)(A-F), summarized below:

- A. Information specifying the levels of performance achieved with respect to the primary indicators (I)-(IV);
- B. The total number of individuals exiting from the program of study (or the equivalent);
- C. The total number of participants who received training services through each of the adult program and the dislocated worker program authorized under chapter 3 of subtitle B, disaggregated by the type of entity that provided the training, during the most recent program year and the three preceding program years;

- D. The total number of participants who exited from training services, disaggregated by the type of entity that provided the training, during the most recent program year and the three preceding program years;
- E. The average cost per participant for the participants who received training services, disaggregated by the type of entity that provided the training, during the most recent program year and the three preceding program years; and
- F. The number of individuals with barriers to employment served by each of the adult program and the dislocated worker program authorized under chapter 3 of subtitle B, disaggregated by race, ethnicity, sex, age, and each subpopulation (of barriers to employment).

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.