Reintegration of Ex-Offenders, OMB 1205-0455: SUPPORTING STATEMENT FOR REQUEST for Extension with Revisions FOR OMB APPROVAL UNDER THE PAPERWORK REDUCTION ACT OF 1995

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A.   JUSTIFICATION

The Department of Labor, Employment and Training Administration (ETA) requests the Office of Management and Budget's approval of the extension, with revisions, of the reporting and recordkeeping requirements of the Reintegration of Ex-Offender – Adult (RExO-Adult) program.

This standardized data collection for program participants – quarterly reports and Management Information System (MIS) quarterly reporting – is completed by RExO-Adult grantees or their sub-grantees. The quarterly performance report (ETA-9140) includes aggregate and participant-level information on demographic characteristics, types of services received, placements, outcomes, and follow-up status. Specifically, this report collects data on individuals who receive occupational skills training, employment training and placement services, housing assistance, mentoring, and other services essential to reintegrating ex-offenders through RExo-Adult programs. There are no changes proposed for ETA-9140 in this information collection request package; there are minor changes to a few required data elements.

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 ETA.

A.1 Circumstances Necessitating Data Collection

The Reintegration of Ex-Offenders-Adult program is a Workforce Investment Act (WIA) demonstration grant [Pub. L. No. 105-220, Sec 171(b)] designed to reduce recidivism by helping inmates find work when they return to their communities. RExO-Adult programs incorporate employment training, mentoring, housing assistance, and other reintegration services in coordination with businesses, One-Stop Centers, educational institutions, local housing authorities, and the criminal justice system. In addition to reporting participant information and performance-related outcomes, RExO-Adult grantees must demonstrate their ability to establish effective partnerships with the criminal justice system, local Workforce Investment Boards, local housing authorities, and other partner agencies. They must also demonstrate the cost effectiveness of their projects. The reporting and recordkeeping system incorporates each of these aspects necessary for program evaluation.

Five outcome measures are used to measure success in the RExO-Adult grants: entered employment rate, employment retention rate, attainment of a degree or certificate, average six month post-program earnings, and recidivism rate. Several of these conform to the common performance measures implemented across federal job training programs as of July 1, 2005. By standardizing the reporting and performance requirements of different programs, the common measures give ETA the ability to compare across programs the core goals of the workforce system—how many people entered jobs; how many stay employed; and how many successfully completed an educational program. In addition to the five outcome measures, grantees report on a number of leading indicators that serve as predictors of success. These include participation in

education or training, attainment of degrees and certificates, workforce preparation, mentoring, community service, reduced substance abuse, proportion of enrollees in stable housing, and proportion of enrollees complying with parole conditions.

Beginning in July of 2015, the new Workforce Innovation and Opportunity Act (WIOA) legislation takes effect. With it, a set of new performance measures, common to adults and youth across programs, will be developed and implemented in Program Year 2016. The ETA-9140 will be revised to support these performance measure changes and a new information collection request will be created at that time.

In applying for the RExO-Adult grants, grantees and their sub-grantees agree to submit participant data and aggregate reports on enrollee characteristics, services provided, placements, outcomes, and follow-up status. Grantees collect and report quarterly RExO-Adult performance data using an ETA-provided MIS. The MIS is a web-based case management and reporting application housed on ETA's servers.

As described in WIA Title I section 172, which addresses evaluation criteria of demonstration projects such as RExO-Adult that are authorized under section 171(a-b), the RExO-Adult data is evaluated by ETA to determine program effectiveness. This evaluation includes the extent to which the RExO-Adult program improves the employment competencies of participants in comparison to comparably situated individuals who did not participate in the program, and the extent to which the RExO-Adult program increases the level of employment over that which would have existed in the absence of the program [section 172(a)(1)(A)].

WIA section 172(a) further specifies that the evaluations must address:

- 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 [section 185(d)(2)];
- direct each state, local board, and 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 [section 185(c)(2)];

- require that recipients of funds under Title I 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 [section
  185(a)(2)];
- require that recipients of funds under Title I shall maintain standardized records for all
  individual participants and provide to the Secretary a sufficient number of such records to
  provide for an adequate analysis of the records [section 185(a)(3)];
- specify that the reports shall include information about programs and activities carried
  out under Title I 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 37.37 [(a-b),(d-e)]; and
- require that all elements of the information required for the reports described in section
  185(d)(1)(A-E) above are defined and uniformly reported.

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

- a summary of the achievements, failures and problems of the programs and activities in
  meeting the objectives of Title I;
- a summary of major findings from research, evaluations, pilot projects, and experiments
  conducted under 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; and
- such other recommendations for legislative or administrative action as the Secretary
  determines to be appropriate.

A.2 How, by Whom, and For What Purpose the Information is to be Used

Grantees carry out recordkeeping and reporting requirements with grant funds. As a
government-procured MIS is provided to all grantees, their implementation costs are minimal.
Grant funds may also be used with the prior approval of the grant officer to upgrade computer
hardware and Internet access to enable projects to use the MIS.

Grantees enter data into the MIS on individuals who receive services through RExO-Adult
programs and their partnerships with One-Stop Centers, local Workforce Investment Boards,

employment providers, the criminal justice system, and the local housing authority. These data are used by the Department and ETA to evaluate performance and delivery of RExO-Adult program services. Attachment A contains a list of the required data elements to be collected in the MIS and the purpose for collecting each item. The MIS allows grantees to collect additional participant data beyond those elements required by RExO-Adult.

ETA uses the data to track total participants, characteristics, services, and outcomes for RExO-Adult participants. Additionally, ETA analyzes the data to (1) determine the delivery of core employment services within the WIA framework; (2) study performance outcomes vis-à-vis performance measures, policies, and procedures; and (3) help drive the workforce investment system toward continuous improvement of outcomes and integrated service delivery for ex-offenders. Common measures enhance ETA's ability to assess the effectiveness of the RExO-Adult program within the broader workforce investment system.

Within ETA, the data are used by the Offices of Workforce Investment, Financial and Administrative Management, Policy Development and Research, and Field Operations (including the regional offices). Other DOL users include the Offices of the Assistant Secretary for ETA and Assistant Secretary for Policy.

The reports and other analyses of the data are 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 MIS information and reporting system is 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 reauthorization proceedings.

A.3 Use of Technology to Reduce Burden

To comply with the Government Paperwork Elimination Act, a web-based MIS/Case Management System is provided to grantees and data elements and data definitions are uniform across ETA programs. All RExO-Adult data and reports are submitted to ETA via the Internet. Grantees collect, retain, and report all information electronically through the ETA-provided MIS.

A.4 Efforts to Identify Duplication

A hallmark of WIA Title I is increased accountability in exchange for optimal flexibility. Title I has strengthened accountability by requiring more comprehensive performance standards and establishing quarterly reports for demonstration projects. The data items identified in Attachment A are needed on the individual MIS records to support the measures, and much of these data are used by grantees to prepare the quarterly progress reports.

ETA has 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 and mentoring provided by multiple agencies to help participants get and keep well paying jobs and

obtain stable housing; (2) better identify overlapping and unproductive duplication of services; and (3) reduce the effect of stove-piped data and generate performance information across employment and training programs. Information provided through the RExO-Adult management information and reporting system is not available through other data collection and report systems.

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 subgrantees are discussed in other sections of this supporting statement.

A.6 Consequences of Less-Frequent Data Collection

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 quarterly reports shall be due 30 days after the reporting period. If ETA did not comply with these requirements, funding for demonstration programs would be compromised. In applying for RExO-Adult grants, grantees agree to meet ETA's reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY-13-03), which requires the submission of quarterly reports within 45 days after the end of the quarter.

A.7 Special Circumstances for Data Collection

These data collection efforts do not involve any special circumstances.

A.8 Federal Register Notice and Consultation Outside the Agency

A 60-Day Notice for Public Comment was published in the *Federal Register* on April 2, 2015 (Vol. 80 17787). No comments received.

A.9 Payment of Gifts to Respondents

There are no payments to respondents other than the grant funds described in the Solicitation for Grant Applications (SGA/DFA PY-13-03).

A.10 Confidentiality Assurances

ETA is responsible for protecting the confidentiality of the RExO-Adult participant and performance data and maintaining 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. The Department ensures 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 confidentiality of the data. ETA's Office of Information Systems and Technology (OIST) has been an active participant in the development and approval of data security measures – particularly as they apply to the web-based version of the RExO-Adult system.

A key concern is for the protection of participant social security numbers (SSNs), which is voluntarily provided by the individual as part of this information collection request. The SSN is being requested in order for grantees to properly determine that the individual is eligible to participate in the RExO-Adult program, ensure data integrity, and, to the extent practicable, track program participant outcomes through state wage record systems. The RExO-Adult system also includes 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. When participant files are retrieved within the RExO-Adult system, only the last four digits of the social security number are displayed. Any information that is shared or made public is aggregated by grantee and does not reveal personal information on specific individuals.

A.11 Additional Justification for Sensitive Questions

While sensitive questions will be asked of participants in the proposed data collection, the confidentiality of participants will be protected as discussed in section A.10. In addition, security is built into the data collection system by the MIS contractor. Participant responses to these sensitive questions allow ETA to comprehensively evaluate the effectiveness of the RExO-Adult program.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the RExO-Adult reporting system has three components: (1) the participant data collection burden; (2) the quarterly narrative progress report burden; and (3) the quarterly performance report burden. This response provides a separate burden for each of the three components.

(1). Participant Data Collection Burden

The RExO-Adult *participant data collection burden* considers the amount of participant and performance-related information collected and reported on the participant 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 the federal reporting requirements.

The data collection burden varies by participant based on the range and intensity of services provided by the grantee and its partnerships with One-Stop Centers, local Workforce Investment

Boards, employment providers, the criminal justice system, the grantee programs run by the U.S. Department of Justice, and local housing authorities. For example, data collection may involve acquiring information from the various partner agencies regarding employment training and placement, housing assistance, mentoring, parole, and probation, in addition to the collection of personal and demographic information by the grantees themselves.

To arrive at the average annual figure of 1.8 hours per participant record, Mathematica, the contractor which computed the original data for this submission when it was a new initiative, 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 Justice Department programs.

Finally, RExO-Adult program managers consulted with grantees who have collected this information over the past several years to verify that 1.8 hours, as an average figure devoted for MIS for the estimated 5,817 participants, averaged out among the grantees, represented the best estimate of time devoted to data entry for each participant, given the range of entries anticipated for each participant, as described above. These grantees affirmed this estimate.

Regarding the estimated 5,817 participants for 2015, it is noted that the grantees are in different years in their grants, and those in the final drawdowns are serving fewer participants than those in their initial years of grant-funded activity. To estimate the participants for 2015, the initiative's efficiency measure of $8,000 expended per participant was compared with each grant's expected first-year funding level, which determined the number of those who could be served by each grantee per year. This estimate of the number of participants served through this grant program is also based on the MIS data collected thus far. By dividing the estimated 5,817 participants among the 61 current and anticipated grantees, one arrives at the average per grantee, given the broad range of years into the grant and range of activities and number of potential participants represented by each grantee, of 140 persons per grant: 5,817 divided by 61 = 95.

Estimated National Count:

Record Type	Av Hrs. Per Record	PY 15 Estimated National Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Participant data collected by grantees	1.3	5,817	7,562	$13.62	$102,994.44

Record Type	Av Hrs. Per Record	PY 15 Estimated National Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Participant data provided by individual program participants	.5	5,817	2,909	$13.62	$39,620.58

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 Census Bureau's social assistance industry category May 2015, Current Employment Statistics Survey, U.S. Census Bureau). Source: http://www.bls.gov/web/empsit/ceseeb8a.htm

(2). Quarterly Narrative Progress Report Burden

The RExO-Adult *quarterly narrative progress 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, upcoming grant activities, and updates on product, curricula, and training development. It is assumed that each grantee will spend approximately two days (16 hours) per quarter preparing this report. Information to be included in this quarterly narrative report is laid out in the RExO-Adult Solicitation for Grant Application (SGA) and concomitant grant documents.

Report	Av Hrs. Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Narrative Progress Report	64	61	3,904	$13.62	$53,172.48

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 Census Bureau's social assistance industry category May 2015, Current Employment Statistics Survey, U.S. Census Bureau). Source: http://www.bls.gov/web/empsit/ceseeb8a.htm

(3). Quarterly Performance Report Burden   ETA – 9140

The *quarterly performance report burden* assumes that all grantees use the ETA-provided MIS to generate quarterly performance reports. The MIS applies edit checks to participant data and generates facsimiles of the aggregate information on enrollee characteristics, services provided, placements, outcomes, and follow-up status in quarterly report format. The burden includes reviewing and correcting errors identified by the MIS in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports.

ETA 9140 Report	Av Hrs Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Performance Report	64	61	3,904	$13.62	$53,172.48

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 Census Bureau's social assistance industry category May 2015, Current Employment Statistics Survey, U.S. Census Bureau). Source: http://www.bls.gov/web/empsit/ceseeb8a.htm

 TOTAL ANNUAL HOURS, Narrative and Quarterly Performance Reports, 61 Grantees

64 hours + 64 hours = 128 hours annually OR 32 hours quarterly
Grantees: 4 (times per year) x grantees (61) = 244 responses.
Burden Hours: Add 3,904 to 3,904 for a total of 7,808 for quarterly reporting.

ETA 9140 Report and Narrative Report	Av Hrs Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Dollars
Narrative and Quarterly Performance Reports	128	61	7,808	$13.62	$106,344.96

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 Census Bureau's social assistance industry category May 2015, Current Employment Statistics Survey, U.S. Census Bureau). Source: http://www.bls.gov/web/empsit/ceseeb8a.htm

Summary of Annual National Burden Hours and Cost:

	Participant data collected by grantees	Participant data provided by individual program participants	Quarterly Narrative Progress Report	Quarterly Performance Report	Total
Annual National Burden Hours	7,562	2,909	3,904	3,904	18,279
Annual National Burden Cost	$102,994.44	$39,620.58	$53,172.48	$53,172.48	$248,959.98

A.13 Estimated Cost to Respondents

a) **Start-up/capital costs:** There are no start-up costs, as ETA provides 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 the quarterly reports.

b) **Annual costs:** There are no annual costs, as ETA is 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 MIS system is fully developed and these costs have been absorbed. The annual costs of maintaining the system and developing training and technical assistance guides, estimated to be $285,000, are borne by ETA. This includes the costs for two shared programming staff to address the maintenance and development needs of the MIS as well as the costs for the MIS portion of the program's technical assistance contract.

A.15 Changes in Burden

The change in burden is due to an increase in grantees. There were minor changes to the Quarterly Performance Report ETA-9140 (changes to data elements only) that do not impact the burden. (Please see attached annotated sample ETA-9140 for data element changes.)

A.16 Tabulation of Publication Plans and Time Schedules for the Project

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

Each year, ETA issues an annual report summarizing program performance based on the Secretary's goals. Data contained in the RExO-Adult reports 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. All reports are available on the Internet and accessible to the public.

Product	Submission Date	Comments
Quarterly Narrative Progress Report	Within 45 days after the end of the quarter.	Quarterly progress reports and MIS data will be submitted electronically using ETA's On-Line Electronic Reporting System.
Quarterly Performance Report	Within 45 days after the end of the quarter.	

A.17 Approval Not to Display OMB Expiration Date

ETA is not seeking approval to conceal the OMB Expiration Date.

A.18 Exceptions to OMB Form 83-I

No exceptions are requested in the "Certification of Paperwork Reduction Act Submissions."

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not contain statistical methods.