

**SUPPORTING STATEMENT, OMB 1205-0417
Workforce Information Grants to States (WIGS)**

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.

This collection of information is necessary to comply with the reporting requirements of the Workforce Investment Act (WIA) Pub. L. 105-220, Sections 111(d)(8) and 309 (29 U.S.C. 2821(d)(8) and 49(l)(2)), which can be found at <http://www.doleta.gov/usworkforce/wia/wialaw.pdf>; and 29 Code of Federal Regulations (CFR) Parts 96.41 (<http://www.gpo.gov/fdsys/pkg/CFR-2012-title29-vol1/pdf/CFR-2012-title29-vol1-part96.pdf>) and 97 (<http://www.gpo.gov/fdsys/pkg/CFR-2012-title29-vol1/pdf/CFR-2012-title29-vol1-part97.pdf>); and 2 CFR 225 (<http://www.gpo.gov/fdsys/pkg/CFR-2013-title2-vol1/pdf/CFR-2013-title2-vol1-part225.pdf>).

WIA Section 309 requires the Secretary of Labor to oversee the development, maintenance, and continuous improvement of a nationwide employment statistics (workforce information) system; and to evaluate the performance of the system and recommend needed improvements, taking into consideration customer consultation results, with particular attention given to improvements needed at the state, regional and local levels. This information collection for the Workforce Information Grants to States (WIGS) ensures that the U.S. Department of Labor (DOL) Secretary meets WIA requirements, including that the states complete grant deliverables such as state economic analyses or special workforce information/economic studies, and the annual performance report.

ETA requests only one substantive modification in this WIGS Training and Employment Guidance Letter (TEGL) that increases the burden, compared to the previous information collection: the addition of an online annual reporting system, in order to enhance the value of the information collected to all states and to ETA.

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. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

WIGS grantees primarily serve four customer groups: 1) the public (including job seekers and employers); 2) labor market intermediaries who help individuals find a job or make career decisions (such as employment and school counselors, case managers at American Job Centers, and community-based organizations); 3) policymakers and employment and economic program planners and operators; and 4) miscellaneous other customers, including researchers, commercial data providers, and the news media.

The policy development and oversight responsibilities of DOL include defining deliverables and accountability measures for the Workforce Information Grants to States. DOL's Employment and Training Administration (ETA) has used information provided in response to this data

collection to assess the extent to which the states have met the grant deliverables, whether the Federal investment has achieved planned outcomes, and to identify technical assistance needed by the states. To ensure accountability, ETA regional offices assess and document the effectiveness of grantee performance through the periodic review and observation of states' progress against grant deliverables, annual performance reports, and the degree of participation in partnership and customer service opportunities that enable state leveraging of limited workforce information program resources.

The requirement that states produce economic analyses and special workforce information/economic studies and reports ensures that the workforce and labor market information created through Federal funds supports and substantively contributes to overall state workforce investment system planning and to state and sub-state economic development. The analyses, studies, and reports created through this deliverable are to inform the workforce and economic development policy and investment decisions made by the governor and state and local workforce investment boards.

This ICR has nothing to do with the Workforce Investment System Performance Reporting System (WISPR) and does not include a customer satisfaction survey, which the statute does not require for this collection. Requirements for customer consultation ensure that state products and services meet customer needs, and are continuously improved; however these outreach activities are considered good business practices that would be conducted in any case

ETA posts links on its Web sites to all state annual performance reports and economic analyses and special workforce information and economic studies. This makes them readily available to the public and allows states to compare their products and services with other states (thereby promoting learning and competition among the states to deliver products and services that best meet their residents information service needs). ETA also requires that states publish grant products on their own Web sites, to maximize their accessibility to state residents.

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.

ETA continues to require the use of electronic submission of workforce information grant annual reports, state economic analyses and special workforce information/economic studies, and reports as a means to reduce the state hard-copy reporting burden to the greatest extent practicable. All 54 state and territorial grantees now utilize electronic formats to submit required grant deliverables. To reduce the burden, ETA now accepts Internet hyperlinks as an alternative to the requirement to submit .pdf (portable document format) versions of grant deliverables. This additional means of submission, a technological improvement from the previous ICR, reduces burden but is not quantifiable.

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 requested is unique to these grants and is not otherwise available. Since the previous information collection request submission to OMB, ETA has endeavored to reduce the burden upon respondents by 1) eliminating the requirement for submission of .pdf documents, in favor of Internet hyperlinks (as explained above); and 2) eliminating the requirement for submitting full-scale annual economic reports, and instead giving states the discretion to substitute less comprehensive analyses if they believe the state economic and labor market conditions have not sufficiently changed to necessitate a full-scale annual economic report.

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

The collection of information only affects state grantees, and does not affect 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.

Management of the nationwide workforce information system requires the regular, reasonable collection of information to assure accountability for the investment of funds and that the grants are achieving statement of work outcomes. Further, Section 309 of the Act requires that the performance of the employment statistics system be evaluated annually, taking into consideration the results of customer consultations.

Apart from the statutory obligation to collect the information, the benefits to the public and the workforce investment system (i.e., Federally-funded employment and training programs) would be significantly lessened absent the uniform standards and oversight provided by the grant deliverables and requirements. For example, without consistent workforce data definitions, the data provided by each jurisdiction would not be comparable, and therefore would have little credence or value for users.

All information is required on an annual basis.

7. Explain any special circumstances that require the collection to be conducted in a manner:

- a. **requiring respondents to report information to the agency more often than quarterly;**
- b. **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- c. **requiring respondents to submit more than an original and two copies of any document;**
- d. **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- e. **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;**
- f. **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

- g. 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**
- h. requiring respondents to submit proprietary trade secrets, 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.**

ETA has no such requirements nor requires a statistical survey. ETA uses the approved industry and occupational classifications.

8. If applicable, provide a copy and identify the date 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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice announcing a 60-day public comment opportunity for this information collection was published on August 7, 2013 (vol. 78, p. 48918). One comment was received – from the State of Virginia Employment Commission – and the summary of that comment follows (the comment is also available in the Public Comments section of this information collection request).

1. The benefits of the proposed Annual Narrative Reporting System (ANRS) are not clear.
2. The submission of the annual narrative report to the U.S. Employment and Training Administration (ETA), together with its electronic entry into ANRS, reflects a duplicative burden.
3. The difficulty for the states in using ANRS may be more challenging and time-consuming than ETA anticipates in its current time estimates.

ETA appreciates the points made in this comment and responds as follows.

1. The consolidation of the information from all states and territories into a single database will facilitate searches by ETA and the states to identify similarities and differences in state activities, whether at a national, regional, or customized level for selected jurisdictions. It will thereby significantly reduce the time to answer specific questions, which would otherwise necessitate a review of each jurisdiction's annual report.
2. State submission of electronic copies or hyperlinks to the state's WIGS annual reports is a part of ETA's effort to provide transparency for the states and the public, to facilitate comparisons of results and initiatives. The annual reports are mounted on the DOL/ETA Web site along with other important workforce investment plans and performance reports. ETA believes that the burden is justified by the benefits explained in point 1 above.
3. Given various tests, ETA believes that the time estimates provided are accurate. The copy and paste approach to data entry is efficient and effective. ETA is committed to

testing and refining the system in advance of the states' submissions, in order to ensure that it will work properly and not cause problems for the states to submit the required information.

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

ETA does not provide any payments or gifts to respondents.

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

ETA is neither requesting nor collecting confidential information from 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.

Not applicable.

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. 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 total number of respondents is 54 (50 states, plus the District of Columbia and the territories of Guam, Puerto Rico, and the Virgin Islands). Each respondent publishes an annual comprehensive economic report or less comprehensive economic analyses and submits an annual performance narrative report.

The burden estimates below were based on consultation with states regarding preparation of a state economic analysis report, and production of an annual performance narrative report, including the results of the customer satisfaction consultations and assessments. The states, based on resident density, were small to large in size, and included Alabama, Florida, Illinois, North Carolina, South Carolina, Tennessee, and Utah. A simple average was used to determine the representative burden for all of the WIGS grantees.

New Annual Report Database: Please note that the added 54 hours to this information collection request are due solely to ETA's developing an online annual report system for states to enter annual report data. ETA also plans to offer query functionality to allow states to access the database of narrative reports in a flexible and customizable fashion for review and comparison among states and to allow a national view for each of the grant deliverables and consultations findings nationwide.

WIGS PRA BURDEN	Number of Respondents	Annual Responses per	Time per Task	Hourly Cost per	Total Time	Total Cost Burden (\$)
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ESTIMATES		Respondent	(hours)	Task (\$)	Burden (hours)	
Grant preparation Required economic report or analyses	54	1	63.22	41.94	3414	143,183
Annual report to ETA	54	1	434.86	41.94	23,482	984,835
New annual report database	54	1	80.22	41.94	4,332	181,684
Totals (unduplicated respondents)	54	4	578	41.94	31,282	1,311,967

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14). The cost of contracting out or paying outside parties for information collection activities should be included here. 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 collections service should be a part of this cost burden estimate. 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.

ETA does not expect that states fund any of the required activities with state or other funding. Federal grant funds have been sufficient to fully support the planning and administration of the grant; production of the required grant deliverables (including relevant economic analyses, special workforce information and/or economic studies and customer consultations), and reports on grant activities.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The Federal government's costs are divided between the ETA regional and national offices, and between the program and grants units in the national office. Federal staff tasks include 1) review of the annual economic report or other analyses, and 2) review of the annual performance report.

These tasks involve review of the grant deliverables, telephone calls/emails, negotiating changes to expected deliverables, consultation with grantee and other Federal staff, and file review and maintenance.

The cost for ETA for building the online reporting system for the current approval cycle is estimated at \$9,600. In addition, ETA is claiming the estimated \$1,311,967 States are expected to spend to comply with this information collection as a Federal expense. ETA includes administrative funds through the Annual Workforce Information Grant to States, in order to offset the cost of Federal mandates.

ETA Federal hourly staff costs were calculated at \$48 per hour for a GS-13, Step 5. (Source: Office of Personnel Management, 2013 General Schedule Locality Pay Table for the Washington, D.C. area, at <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2013/general-schedule/>.)

Federal Burden	Hourly Cost	Total Time Burden (hours)	Total Cost Burden (\$)	Annualized Cost
Review of economic report or analyses	48.00	256	12,288	12,288
Review of annual report to ETA	48.00	294	14,112	14,112
ETA IT development of the online narrative reporting format. (One-time)	48.00	200	28,800	9,600
Federal Total			55,200	36,000

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

To reduce the burden, ETA now accepts Internet hyperlinks as an alternative to the former requirement to submit .pdf (portable document format) versions of grant deliverables. Accepting this additional means of submission is a change from the previously approved ICR submission.

The added 54 hours to this information collection request are due solely to ETA’s developing an online annual report system for states to enter annual report data. ETA also plans to offer query functionality to allow states to access the database of narrative reports in a flexible and customizable fashion for review and comparison among states and to allow a national view for each of the grant deliverables and consultations findings nationwide.

Tests of the demonstration annual narrative reporting system (ANRS) took between 15 minutes to an hour to copy and paste the annual narrative report data into the nine ANRS data fields. For the purposes of calculating the data collection burden estimate, ETA used the higher of the two testing times. States will enter data into the ANRS once per year.

In the currently approved information collection (OMB 1205-0417), the states must already submit an annual performance narrative report summary of grant deliverables. As noted in this excerpt from the annual guidance TEGL Annual Performance Report section:

Grantees must submit an annual performance report to their ETA regional office that summarizes all grantee activities, and lists the core deliverables and activities shown below, in the order indicated.

- i. Workforce information database (WIDb)
- ii. Industry and occupational projections
- iii. Annual economic analysis and other reports
- iv. Customer consultations
- v. Activities undertaken to meet customer needs
- vi. New tools and resources
- vii. Efforts to create and support partnerships and collaborations
- viii. Activities to leverage LMI-WI funding
- ix. Recommendations to ETA for changes and improvements to WIGS requirements

In addition to providing a hyperlink to the annual narrative report, states must now enter their state's narrative report into the WIGS Annual Narrative Report System (WIGS ANRS). The WIGS ANRS data fields follow the outline above, and states may copy and paste sections of the annual narrative into the ANRS data fields. After all state annual reports are entered into ANRS, a report generation functionality will allow states to access standard queries and reports. The system's relational database will be able to accommodate database inquiries with a limited number of standard output report formats for each of the nine data elements at the following geographic levels:

1. National,
2. ETA Regional,
3. Selection of states grouped as small, medium, and large based on population, and
4. Selection by state name to allow multi-state or regional reports.

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.

Since 2002, ETA has published each state's annual performance report on a secure ETA-supported Web site for public access and review, as requested by the grantees and the workforce development system. Beginning with the 2006 grant deliverables, ETA has also publicly posted all submitted state economic analyses, reports, and workforce information studies, again as requested by the grantees and the workforce development system.

ETA has no plans to tabulate the information collected, and therefore no complex analytical techniques are involved.

ETA generally seeks to publish the WIGS guidance and instructions in the Spring, as soon as possible after ETA calculates the state monetary allotments, in order to give states the maximum opportunity to plan for the program year to which the guidance applies: the program year (PY) spans July 1 through the following June 30. ETA's grant office selects the grant application due date each year, selecting a date at least one month after publication of the guidance; however, ETA Regional Administrators have the discretion to extend submission due dates upon state request, if warranted.

All information collection occurs within the scope of the grant performance period. Deliverables are generally due within the applicable PY, although the annual performance report is due by September 30 of each year — 90 days following the end of the PY, per 29 CFR 97.40 (b)(1).

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.

DOL displays the OMB approval number and expiration date, as required.

18. Explain each exception to the certification statement.

This information collection contains no exceptions.

B. Collection of Information Employment Statistical Methods

Not applicable, as this information collection does not entail statistical methods.