SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSIONS

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The information collections as described below are a continued collection of performance data previously required by VETS absent approval from the Office of Management and Budget (OMB) as required under the Paperwork Reduction Act (PRA). VETS initiated the collection of performance data in 2002 and ceased the collection in October 2015 when the agency learned that it was not in compliance with the provisions that require having advance OMB approval to collect performance data for the discretionary grants authorized under chapter 20 of title 38 of the United States Code (USC). VETS then initiated this PRA information collection request.

The collection of information is necessary for the proper oversight of discretionary grant funds administered by the Department of Labor's Veterans' Employment and Training Service (VETS) as required by law and regulation. These discretionary grants fund approximately 150 homeless veterans' reintegration projects to serve roughly 17,000 homeless veterans and incarcerated veterans at-risk of homelessness annually. The discretionary grant funds are also used to fund approximately 66 Stand Down events annually.

There are two statutory provisions requiring the collection of information:

- The Homeless Veterans' Reintegration Program (HVRP) is authorized under 38 USC 2021. The collection of program data is required under 38 USC 2021(b):

  "REQUIREMENT TO MONITOR EXPENDITURES OF FUNDS.—(1) The Secretary of Labor shall collect such information as that Secretary considers appropriate to monitor and evaluate the distribution and expenditure of funds appropriated to carry out this section. The information shall include data with respect to the results or outcomes of the services provided to each homeless veteran under this section. (2) Information under paragraph (1) shall be furnished in such form and manner as the Secretary of Labor may specify."

- The Homeless Women Veterans and Homeless Veterans with Children Reintegration (HWVHVCR) grant program is authorized under 38 USC 2021A. The collection of program data is required under 38 USC 2021A(c).

  "REQUIREMENT TO MONITOR EXPENDITURES OF FUNDS.—(1) The Secretary of Labor shall collect such information as that Secretary considers appropriate to monitor

and evaluate the distribution and expenditure of funds appropriated to carry out this section. The information shall include data with respect to the results or outcomes of the services provided to each homeless veteran under this section. (2) Information under paragraph (1) shall be furnished in such form and manner as the Secretary of Labor may specify".

Additionally, there are two administrative provisions in Title 29 of the Code of Federal Regulations (CFR) requiring grantees to submit performance reports:

- 29 CFR 97.40 (1). *"Grantees shall submit annual performance reports unless the awarding agency requires quarterly or semi-annual reports. However, performance reports will not be required more frequently than quarterly. Annual reports shall be due 90 days after the grant year, quarterly or semi-annual reports shall be due 30 days after the reporting period. The final performance report will be due 90 days after the expiration or termination of grant support. If a justified request is submitted by a grantee, the Federal agency may extend the due date for any performance report. Additionally, requirements for unnecessary performance reports may be waived by the Federal agency. (2) Performance reports will contain, for each grant, brief information on the following: (i) A comparison of actual accomplishments to the objectives established for the period. Where the output of the project can be quantified, a computation of the cost per unit of output may be required if that information will be useful. (ii) The reasons for slippage if established objectives were not met. (iii) Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs"*

- 29 CFR 95.51 (b). *"DOL shall prescribe the frequency with which performance reports shall be submitted. Except as provided in paragraph (f) of this section, performance reports shall not be required more frequently than quarterly or, less frequently than annually. Annual reports shall be due 90 calendar days after the grant year; quarterly or semi-annual reports shall be due 30 days after the reporting period. DOL may require annual reports before the anniversary dates of multiple-year awards in lieu of these requirements. The final performance reports are due 90 calendar days after the expiration or termination of the award. (c) If inappropriate, a final technical or performance report shall not be required after completion of the project. (d) When required, performance reports shall generally contain, for each award, brief information on each of the following: (1) A comparison of actual accomplishments with the goals and objectives established for the period, the findings of the investigator, or both. Whenever appropriate and the output of programs or projects can be readily quantified, such quantitative data should be related to cost data for computation of unit costs. (2) Reasons why established goals were not met, if appropriate. (3) Other pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs."*

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.

Please note that all of the forms identified in this request are to be submitted by entities receiving discretionary funding as a condition of funding. All forms are submitted electronically through the VETS automated performance accountability and reporting system. This is a web-based system that was designed to receive and compile data and provide reports on several VETS programs.

- The Competitive Grants Planned Goals Chart (VETS-700) is a Microsoft Excel worksheet tool for grantees to summarize quarterly output and outcomes goals for services provided to participants, performance goals for outcome measures, and quarterly expenditure goals. The actual performance of grantees for each indicator is compared to the indicator's goal on a quarterly basis by VETS staff to assess grant progress. This information is submitted one time by each grantee. The VETS-700 report is to be completed and submitted at the start of the grant period of performance and may be changed through the grant modification process, if appropriate. The VETS-700 form and the VETS-701 form (including supporting tabs) are located in the same workbook.

- The Technical Performance Report (TPR) or form VETS-701 is a Microsoft Excel tool that was developed by VETS to assist grantees to streamline and manage their reporting process and to help in providing the required quarterly aggregate data that is submitted into the automated performance accountability and reporting system. The VETS-701 report is prepared and submitted quarterly by each grantee. The TPR contains the following worksheets or tabs, in the order in which they appear in the workbook:

  - *Planned Goals Tab (VETS-700)* – is the Competitive Grants Planned Goals Chart form discussed earlier.
  - *TPR Tab (VETS-701)* – summarizes actual participation, expenditures and outcome information and compares actual performance to planned performance for the reporting period.
  - *Participants Tab (VETS-701B)* – provides 1,000 rows for entering demographic and other information related to the grantee's program participants.
  - *Reporting Tabs (VETS701B through VETS-701F)* – summarize information entered on the Participants tab (VETS-701B) and the Exit Quarter tabs (VETS-701C-VETS-701F). The grantee also directly enters Assessments, Training Activities and Expenditures on this tab.
  - *Demographics Summary Tab (VETS-701A)* – summarizes the demographic information entered on the Participants Tab. The enrollment and placement information on this tab is entered into the automated performance accountability and reporting system during the first four quarters of the grant period, or during the "active" quarters.

- The Competitive Grants Technical Performance Narrative report (VETS-702) is an Adobe fillable document for grantees to use to describe actual quarterly performance summarized in the VETS-701 report when compared to the planned goals taken from the VETS-700 report. The information is used by VETS staff to track and assess the quarterly performance of each grant. The grantees provide narrative explanations of significant performance deviations in addition to describing grant activities, successes and planned actions.

- The Stand Down After Action Report (VETS-703) is a Microsoft Word document that summarizes the outreach and supportive services made available and accessed by homeless veterans participating in each grant-funded Stand Down event. Stand Downs are one to three-day events providing supplies and services to homeless veterans, such as food, shelter, clothing, health screenings and U.S. Department of Veterans Affairs (VA)

Social Security benefits counseling. Homeless veterans can also receive referrals to other assistance such as health care, housing solutions, employment, substance use treatment and mental health counseling. The information is used by VETS staff to track and assess the performance of each Stand Down grant. The VETS-703 report is completed and submitted by each grantee at the conclusion of the Stand Down event.

Please note the VETS-700, VETS-701, VETS-702 forms are completed by each grantee operating a homeless veterans' reintegration project. The VETS-703 form is completed by each grantee receiving funds to operate a Stand Down event. All forms will be made available for download from the VETS homepage.

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.

The VETS-700 and the VETS-701 reports are in spreadsheet file formats, while the VETS-702 and the VETS-703 documents are in word processing file formats. Blank forms are electronically transmitted to the grantee as attachments to Veterans' Program Letters and automated copies will be found on the VETS Internet homepage for download. The VETS-700, VETS-701 and the VETS-702 reports are submitted electronically by each grantee via the VETS automated performance accountability and reporting system. The VETS-703 report is submitted to VETS in paper form and then scanned and entered into the system or transmitted to the VETS program lead.

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.

There are no duplicative forms in this request. The information collected on VETS-700 through VETS-703 forms does not duplicate other data collected through other Department of Labor OMB-approved information collection. A search of the published application forms and Federal reports via www.reginfo.gov indicates that these forms and reports do not duplicate any similar information collections currently in use by other Federal departments.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form '83-I), describe any methods used to minimize burden.

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

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Without these collections, VETS staff cannot conduct the necessary Federal oversight to determine the quality of grant implementation, the success of each grant, and to ensure option year awards and past experience can be objectively reviewed and evaluated The information is also used to provide annual reports to Congress on the activities and outcomes associated with the grant funding.

The VETS-700 and VETS-703 forms are completed and submitted on a one-time basis. There are no opportunities to conduct these form collections less frequently.

The VETS-701 and VETS-702 forms are completed and submitted to VETS on a quarterly basis. Since grants to fund homeless reintegration projects range in duration from 1 year to 1 year and 9 months in duration, reporting less frequently than quarterly would impede the agency's efforts to track and manage the performance of these grants to ensure the highest return on the investments of Federal monies.

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

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

These data collection efforts do not involve any special circumstances.

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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Department published a Federal Register Notice on January 8, 2016 (81 FR 970) notifying the public of its intent to pursue this information collection. No public comments were received.

It is important to note that all organizations operating competitive grants had prior knowledge of the forms highlighted in this Supporting Statement and that the Department annually sought (and continues to seek) from grantee organizations their views on the reporting forms, clarity of instructions, ease of use, utility, frequency, and formats. This feedback is through the "Community of Practice" consultations conducted by the National Coalition for Homeless Veterans (NCHV) grantee under a cooperative agreement with the Department. NCHV forwards these comments and suggestions to the appropriate Grant Officer Technical Representative(s) for follow-up discussions. Comments and suggestions from these annual consultations were incorporated into the forms prior to submitting this information collection request.

The NCHV provides guidance and information about program development, administration, governance and funding to all of the nation's homeless veteran service providers, including providers funded through DOL-VETS competitive grants. This is achieved through face-to-face meetings, conferences, consultations, publications, and the NCHV website.

Additionally, the Department consulted with various Veterans Service Organizations (VSOs) to obtain their views on the reporting forms, clarity of instructions, ease of use, utility, frequency, and formats. The VSOs provided feedback on ways to streamline the reports to improve the ease of use and to limit the data elements to only critical reporting elements. The Department routinely engages VSOs in dialogues on ideas for improving services to veterans.

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

There are no payments to respondents other than the awarded grant funds.

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

VETS is responsible for keeping confidential the reported information and maintains the data in accordance with all applicable Federal laws, with particular emphasis upon compliance with the provisions of the Privacy and Freedom of Information Acts. The Privacy Act does not apply to this collection as the reported data do not contain any individually identifying information. While grantees will submit records on individuals, it is important to note that personally identifying information will not be included in these submissions. Grantees will assign to each participant a unique individual identifier. The person attached to each individual identifier is only known by the grantee.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are included in any application or any report form described in this information collection request.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The numbers of respondents per year listed in Table 1 are averages derived from actual numbers of respondents for each form for the past three years. The numbers of respondents were determined using VETS automated performance accountability and reporting system.

The burden per response for each information collection activity was determined through information captured through informal consultations with a small number of grantees with experience in completing these forms over the past three years. The burden estimates include the time to review the instructions, find the information, and complete each form. The estimated annualized respondent costs in Table 2 represent monetized burden hours. The rate of pay used to monetize the burden hours is the average hourly rate of pay for Training and Development Managers as reported in the May 2015 Occupational Employment Statistics produced by the Department of Labor's Bureau of Labor Statistics.

Table 1
Estimated Annualized Respondent Hours Burden

Form	Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Average Burden per Response (in hours)[1]	Total Respondent Burden Hours
VETS-700	160	1	160	1	160
VETS-701	328	4	1,312	3	3,936
VETS-702	328	4	1,312	1	1,312
VETS-703	66	1	66	2	132
Total			2,850		5,540

[1] Average number of hours to complete the form as reported by a small number of grantees to VETS regional office staff in 2015.

Table 2
Estimated Annualized Respondent Cost Burden

Form	Total Respondent Burden Hours	Hourly Wage Rate[1]	Total Respondent Costs
VETS-700	160	$53.69	$8,590
VETS-701	3,936	$53.69	$211,324
VETS-702	1,312	$53.69	$70,441
VETS-703	132	$53.69	$7,087
Total	5,540	$53.69	$297,442

[1] The average hourly rate of pay for Training and Development Managers as reported in the May 2015 Occupational Employment Statistics produced by the Department of Labor's Bureau of Labor Statistics (http://www.bls.gov/oes/current/oes113131.htm).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are zero costs.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of

hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The total annual costs to the federal government are estimated to be $7,750. The annual costs include funding needed to maintain the competitive grants database, maintain the quarterly reporting software, and develop technical assistance guides. The $7,750 represents an estimated proportional share of the $31,000 in total annual costs to operate and maintain its current automated performance accountability and reporting system. In addition to the competitive grants data highlighted in this request, the system includes data from other approved information collection requests.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

This is a new request for a data collection that was previously collected without an OMB Control Number.

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.

There are no plans to publish the results separately from those reported to Congress annually as required.

However, it is worthwhile to note the Chief Evaluation Officer (CEO) for the Department initiated a 24-month study in June 2014: to document the types of services and supports offered through grantees receiving awards under the Homeless Veterans Reintegration Program (HVRP). to identify potentially promising practices or models, and to conduct statistical analysis of administrative data collected by the grantees and other data as applicable on job placement and other outcomes of interest of HVRP participants. The CEO also plans to conduct an evaluation of the Homeless Veterans' Reintegration Program (HVRP) using unemployment insurance wage data collected beginning in Program Year 2016. The results of the planned evaluation are not expected until late 2019. No details about the planned evaluation study are available at this time and VETS understands that an additional information collection clearance may be needed to conduct the evaluation.

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.

The expiration date for OMB approval will be displayed. We are not seeking approval to have this concealed.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

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