

SUPPORTING STATEMENT

**Reporting and Performance Standards System for Migrant and Seasonal Farmworker
Programs Under Title I, Section 167 of the Workforce Investment Act (WIA)
OMB Control No. 1205-0425**

A. JUSTIFICATION

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

The National Farmworker Jobs Program (NFJP) provides career services and training, youth services, housing assistance and other related assistance to low-income migrant and seasonal farmworkers (MSFWs) and their dependents. Authorized under the Workforce Innovation and Opportunity Act (WIOA), the program seeks to counter the impact of the chronic unemployment and underemployment experienced by MSFWs who depend primarily on jobs in agricultural and fish farming labor. NFJP grant funds are awarded to community-based organizations and public agencies every four years through a grant competition.

The Department awards two types of NFJP grants to eligible entities: employment and training grants to provide career services and training, youth services, and other related assistance; and housing assistance grants to provide housing assistance and other related assistance. NFJP employment and training grantees are required to submit a Program Planning Summary report (ETA 9094) and a Program Status Summary report (ETA 9095), a quarterly file of individual records on all participants who exit the program (Workforce Investment Act Standardized Participant Record (WIASPR), and a program plan narrative. Housing assistance grantees are required to submit a Housing Assistance report (ETA 9164) and a program plan narrative.

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 program integrity. The use of a standard set of data elements, definitions, and specifications at all levels of the public workforce system, which includes the NFJP, that helps to improve the quality of program and performance information that is received by the Department. These reporting requirements encompass a minimum level of information collection that is necessary to hold grantees appropriately accountable for the Federal funds they receive, assess progress against a set of common performance measures, and allows the Department to fulfill its oversight and management responsibilities.

ETA's statutory and regulatory authorities to administer the NFJP include provisions allowing for the requirement of reporting from grantees. WIOA includes provisions that require each grantee to furnish to the Secretary information and reports necessary or appropriate for carrying out the purposes of Section 167 of the Act. Information is collected through the NFJP reporting and recordkeeping system under the following authority:

WIOA, section 167(c)(1) and (2), requires submission of a grant plan describing a 4-year strategy for serving eligible MSFWS in the area to be served.

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.

Grantees implement these recordkeeping and reporting requirements with available funds. These reporting requirements help to organize data that are collected by grantees and help standardize the measurement of performance. Information collected and reported through the PPS Report, ETA 9094; the PSS Report, ETA 9095; the WIASPR files; the HAS Report, ETA 9164; and the grant plan narrative will be used by grantees and ETA for the following purposes:

1. To provide program and performance information to stakeholders including participants, businesses, taxpayers, Congress and others;
2. To continuously improve the quality, effectiveness and efficiency of customer services delivered through the NFJP and to inform technical assistance provided to grantees;
3. To provide management information for use in Federal program administration, including grant-specific participation, service, and outcome summaries; and
4. To conduct oversight and monitoring and hold grantees appropriately accountable for the Federal funds they receive.

Each employment and training grantee receiving NFJP funds must submit the following:

- A comprehensive service delivery plan and a projection of participant services and expenditures covering the four-year designation cycle;
- The PPS report (ETA 9094) as part of annual program plan updates; it is used to collect planned stream and numbers of participants (i.e. new participants, carry-overs and exiters), and the array of planned services provided for the program year;

The PSS report (ETA 9095) on a quarterly basis and cumulatively by Program Year quarters. This report is used to collect quarterly data on actual participant numbers and services.

- Recipients of employment and training grants submit a Quarterly Narrative Progress Report to provide relevant data and information on program activities and outcomes. The report serves as a tool to monitor and evaluate consistency throughout each stage of progress of all program services. ETA provides guidance to the grantees regarding the content of the grant plan narrative. There is no official form or template for this narrative, which is estimated to take 20 hours to complete annually. ETA Form 9095 includes a short section to collect narrative information on grant activities.
- The WIASPR contains data on NFJP participant characteristics and services. Employment and training grantees submit their reports to ETA on a quarterly basis. ETA uses the reports to measure the extent to which each grantee is meeting its performance goals. Reports also facilitate preparation and submission of an electronic file of records for WIOA Section 167 grantees that complete the program. It describes the record layout, codes, and data

verification edits that should be used to create such a file. It collects individual participant records containing demographic, service, and outcome data on individuals who exit the program. The main purpose of the WIASPR data system is to:

1. Establish a standardized set of data elements, definitions, and specifications that can be used to describe the characteristics, activities, and outcomes of job seeker and employer customers served through the One-Stop delivery system;
2. Facilitate the collection and reporting of valid, consistent, and complete information on job seekers and employer customers in order to support the overall management, evaluation, and continuous improvement of workforce programs at the local, state, and federal levels; and
3. Reduce duplicate record keeping by allowing grantees administering multiple Department of Labor-funded workforce programs to utilize a single set of data specifications and formats to report on a job seeker's and employer's interaction with the One-Stop delivery system.

Data from the WIASPR is used by ETA to calculate the common performance measures:

- o Percentage of program participants who are in education or training activities (youth MSFWs only), or in unsubsidized employment, during the second quarter after exit from the program;
- o Percentage of program participants who are in education or training activities (youth MSFWs only), or in unsubsidized employment, during the fourth quarter after exit from the program
- o Median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program,
- o Percentage of program participants who obtain a recognized postsecondary credential or a secondary school diploma or its recognized equivalent during or within one year after exiting the program,
- o 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
- o Effectiveness in serving employers

Each housing assistance grantee receiving NFJP funds for housing assistance activities is required to submit the following:

- A comprehensive service delivery plan and a projection of participant services and expenditures covering the four-year designation cycle;
- The HAS report, (ETA 9164). Each grantee receiving NFJP funds for housing assistance grants will be required to submit this report on a quarterly basis. This report is intended collect data on farmworkers and their families who receive temporary or permanent housing assistance services through the NFJP program.

Data from the ETA 9164 is used by ETA to evaluate housing assistance performance measures:

- o Total number of eligible MSFWs served; and
 - o Total number of eligible MSFW families served
- All housing assistance grantees submit a Quarterly Narrative Progress Report intended to provide relevant data and information on program activities and outcomes. The report will serve as a tool to monitor and evaluate consistency throughout each stage of progress of all the program services. ETA provides guidance to the grantees regarding the content of the grant plan narrative. There is no official form or template for this narrative, which is estimated to take 20 hours to complete annually. ETA Form 9164 includes a short section to collect narrative information on grant activities.
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.**

Over time, ETA has streamlined the collection of NFJP participant data and the preparation of quarterly performance reports by providing uniform data elements and data definitions to grantees, and through the use of technology. All NFJP reports and records are submitted to ETA via the Internet. However, it is left to the grantees to decide the best technology for collecting individual case management data given their unique circumstances and resource availability. Grantees collect, retain, and report all information electronically.

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

NFJP is unique, both by law and regulation. No other data source will supply the information needed to account for and evaluate the program.

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

No small businesses or entities are impacted.

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

Collection of this information is necessary to ensure proper accountability for Federal funds and ensuring that the funds are being spent for the purposes intended by the Congress. This collection of information gives program staff the ability to provide timely technical assistance to grantees that are failing below acceptable performance levels. The collection of fewer data elements would also seriously hamper the ability of the Department to respond to data requests from Congress and others about the program.

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

This data collection effort does not involve any special circumstances.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission.

As required by 5 CFR 1320.8(d), a Notice was published in the Federal Register on November 27, 2015 (80 FR 74140) for sixty days' public comments. No public comments were received.

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

There is no payment or gift to respondents under this data collection.

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

ETA is responsible for keeping the NFJP performance data private 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. ETA may receive records of an individual's Social Security number or a participant's identification number.

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 sensitive questions included in the proposed data collection.

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

The annual national burden for the NFJP reporting system has the following five components: (1) the annual program planning report (ETA 9094); (2) quarterly program status report (ETA 9095); (3) quarterly program status report for housing assistance (ETA 9164); (4) the quarterly WIASPR individual participant records; and (5) the annual grant plan narrative. This response provides a separate burden estimate for each of the components. There are 69 grantees that will respond to this data collection, 52 grantees that provide employment and training services and 17 grantees that provide housing assistance.

(1) Grant Plan Narrative– All NFJP grantees submit a grant plan narrative. ETA provides guidance to the grantees regarding the content of the grant plan narrative. There is no official form or template for this narrative, which is estimated to take 20 hours to complete annually.

- (2) Annual Program Planning Reports** – NFJP employment and training grantees submit an annual program plan (ETA 9094), estimated to take 16 hours to complete, at the beginning of the program year. The data collection burden associated with these forms includes staff time to prepare budget and program planning figures, formatting, and transmitting the annual program planning reports to ETA.
- (3) Quarterly Program Status Report** – NFJP employment and training grantees submit a program status report (ETA 9095), estimated to take 17 hours to complete, each quarter of the grant year. The data collection burden associated with this form includes staff time to prepare training aggregate performance information, program run times, data editing and checking, formatting, and transmitting the quarterly report to ETA.
- (4) Quarterly Housing Assistance Summary Report** – NFJP housing assistance grantees submit a summary report (ETA 9164), estimated to take 17 hours to complete, each quarter of the grant year. The data collection burden associated with this form includes staff time to prepare aggregate housing assistance performance information, program run times, data editing and checking, formatting, and transmitting the housing quarterly report to ETA.
- (5) WIASPR** – NFJP employment and training grantees submit WIASPR data. The WIASPR burden considers the amount of information collected from individual program participants and reported that would not have to be collected by the grantees as part of their customary and usual burden to run the program. The data collection burden associated with the WIASPR includes program run times to extract program participant data, formatting, data editing and checking, and transmitting the files quarterly. Average time per response - 2.25 hours per record.

Hourly rates used to calculate cost depend upon the type of organization administering the program. Because the NFJP is largely administered through community based organizations and public agencies, an average hourly rate of \$15.59 was used in calculating the total annual costs of this collection. This is the average hourly earnings in the U.S. Department of Labor Bureau of Labor Statistics Social Assistance industry category or subsector (NAICS 624) for the latest available calculations at the time of submission. See the all employee average hourly rate at <http://www.bls.gov/iag/tgs/iag624.htm>*

Estimated Annualized Respondent Hour and Cost Burden

Forms	Number of Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden Per Response (in Hours)	Total Burden Hours	Wage Rate*	Total Burden Cost

Reporting and Performance Standards System for Migrant and Seasonal Farmworker Programs
Under Title I, Section 167 of the Workforce Investment Act (WIA)
OMB Control No. 1205-0425
May 2016

Plan Narratives	69	1	69	20	1,380	\$15.59	\$21,514
Program Planning Summary ETA 9094	52	1	52	16	832	\$15.59	\$12,971
Program Status Summary ETA 9095	52	4	208	17	3,536	\$15.59	\$55,126
WIASPR Data	52	4	29,500	2.25	66,375	\$15.59	\$1,034,786
Housing Assistance Summary ETA 9164	17	4	68	17	1,156	\$15.59	\$18,022
TOTALS			29,897		73,279		\$1,142,420

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 additional costs to the respondents other than their time.

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

ETA collects and maintains all reports through its on-line Enterprise Business Support System (EBSS). Since the electronic mechanisms for collecting and storing grantee performance data on a quarterly basis are already in place to support other ETA programs, the annualized cost to the Federal government for the NFJP reports is minimal. The annual costs of maintaining the NFJP quarterly reports and records through EBSS, and generating quarterly performance reports for each grantee based on the common measures is estimated to be \$115,000.

For the quarterly progress reports (ETA 9095 and 9164) and WIASPR files, staff spend approximately 40 hours per quarter on each report (320 hours per year) monitoring the data, providing technical assistance for grantee report submissions, preparing special aggregate reports for internal program management purposes, and generating specific responses to Congressional and other inquiries. Using an average hourly staff rate of \$49.32 multiplied by 320 hours, the estimated annual cost to the Federal government is \$15,782. The hourly rate used to calculate cost is the average hourly rate for a GS-13 (Step 5) employee in the Federal service (see Washington DC area locality pay tables at <https://www.opm.gov/policy-data->

[oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/DCB_h.pdf.\)](#)

The total annual cost to the government:

- Maintaining the NFJP quarterly reports and records: \$115,000
- Staff time for monitoring, technical assistance, generating aggregate reports, and responding to external inquiries: \$15,782

Total: \$130,782

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

ETA is discontinuing the Budget Information Summary Form, ETA 9093. The form is submitted by grantees as part of annual program plan updates. The form, which requires estimates of quarterly expenditures as well as the total carry-over funds from prior program years, is primarily so ETA staff can evaluate grantees' proposed - versus - actual expenditures over the course of the program year. ETA has determined that the information collected on this form is not essential to monitor grantee expenditures; moreover, information on prior year funds exists on ETA 9130 (OMB Control No. 1205-0461), a form already required for grantees. Discontinuation of this form will reduce the total annual reporting burden on each NFJP grantees by 15 hours per year (with a total reduction of Estimated Annual Burden Hours of 780 hours and Annual Burden Cost of \$12,160).

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

These reporting requirements help to organize data that are collected by grantees and help standardize the measurement of performance. While ETA does not provide the information collected in any type of formal publication, performance outcomes are available to the public on the agency's website and program and performance information is provided to Congress and other stakeholders.

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 for OMB approval of the information collection is displayed on each form.

18. Explain each exception to the certification statement.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This collection does not employ statistical methods.