

SUPPORTING STATEMENT
Youthful Offender Grants Management Information System
OMB Control No. 1205-0513

A. JUSTIFICATION

The Department of Labor, Employment and Training Administration's (ETA) request to extend with revisions the reporting and recordkeeping requirements for youthful offender grants funded under the Workforce Innovation and Opportunity Act (WIOA). This reporting structure features standardized data collection for quarterly Management Information System (MIS) report formats.

This request includes the collection of data by grantees on participant characteristics, services provided, and participant outcomes; the quarterly progress report submitted by grantees, the quarterly narrative report, and the annual recidivism report.

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.

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.

Each year, the Department of Labor/Employment and Training Administration is appropriated funds for youthful offender demonstration projects. The Department of Labor uses these funds for a variety of multi-site demonstrations aimed at developing model programs for serving young offenders. The Department expects over the next few years to award 28 new Youthful Offender grants in various sets of demonstrations each year for two years of operation and up to one year of follow-up services and post-placement data collection. In any given year this will result in 28 grants in their first year of operation, 28 grants in their second year of operation, and 28 grants providing follow-up services and tracking post-placement outcomes, for a total of 84 grants collecting data each year.

This data collection request is to permit the Department of Labor to continue with revisions a management information system for these various sets of grantees. This request continues the reporting and recordkeeping system for a minimum level of information collection that is necessary to comply with Equal Opportunity requirements, to hold Youthful Offender grantees appropriately accountable for the Federal funds they receive, including performance measures, and to allow the Department to fulfill its oversight and management responsibilities.

Revisions being proposed in this extension request include adding questions on immigration

status, welfare receipt, mental health treatment, and child support obligations to the data collected at intake; inserting several additional outcomes and clarifying some of the reporting items in the quarterly progress report; and broadening the recidivism survey to cover young adult offenders as well as juvenile offenders and to allow it to be filled out by the adult criminal justice system for young adult offenders. This request also adds the quarterly narrative report to be submitted by grantees.

WIOA 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 the nondiscrimination provisions in 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 in section 185(d) that the reports shall include information about programs and activities carried out under Title I pertaining to:
 - A. relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants
 - B. programs and activities in which participants are enrolled, and the length of time that participants are engaged in such programs and activities
 - C. outcomes of the programs and activities for participants, including the occupations of participants and placement for participants in nontraditional employment
 - D. specified costs of the programs and activities
 - E. information necessary to prepare reports to comply with the nondiscrimination provisions in section 188 and 29 CFR Part 37.37 [(a-b), (d-e)].
- 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.

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.*

ETA is providing grantees with a Web-based system to collect baseline information on participants and to track their activities and outcomes in the program. The grantees provide ETA with quarterly performance reports aggregating the demographic characteristics of enrollees, services provided, and participant outcomes. ETA in turn aggregates the data provided by grantees into a quarterly report of youth offender grants, which is published on ETA's web site along with similar reports compiled for other ETA programs.

Within ETA, the data are used by the Office of Workforce Investment and regional offices to monitor the progress of grantees, identify problems that grantees are facing, and target technical assistance to grantees. The performance data are also now being used to rate the past performance of grantees as part of the review process in competitions for new youth offender grants. The quarterly progress data are also reported to and used by the Office of the Assistant Secretary for ETA and the Office of the Secretary in reviewing the progress of Youth Offender grants in meeting Government Performance and Results Act (GPRA) goals. The performance data summarizing numbers served and key outcomes are also submitted to Congress through OMB in the President's annual budget request.

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.*

To comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of participant data and the preparation of quarterly reports to the extent feasible by providing a Web-based MIS/Case Management System and by providing uniform data elements and data definitions to grantees across ETA programs. All ETJD data and reports will be submitted to ETA via the Internet. Grantees will collect, retain, and report all information electronically through the record-keeping system provided by ETA.

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.*

ETA minimized the reporting burden by limiting as much as possible the number of required data elements. Data items collected by program reports and individual records are needed to account for the detailed services provided by grantees. Information provided through this management information and reporting system is not available through other data collection and report systems.

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

There are no small businesses that will be required to report directly under this data collection request. The only time contacting them may be required is to verify employment or retention of participants employed by them.

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.*

Quarterly Progress Reports allow the Department to monitor grantee progress toward its performance goals and provide timely assistance to the grantees if needed. Without timely reporting, the Department could not measure the success of its grantees, and could not ensure program participants are served by high-quality grants.

WIOA Regulations at 683.300 state that “e) Due date. (1) For the core programs, performance reports are due on the date set forth in guidance. (2) Financial reports and all performance and data reports not described in paragraph (e)(1) of this section are due no later than 45 days after the end of each quarter unless otherwise specified in reporting instructions.” The Youthful Offender program is not a core program. The WIOA Regulations Section III Rulemaking Authority and Background state that “The core programs consist of the adult, dislocated worker, and youth formula programs administered by the Department under WIOA title I; the Adult Education and Family Literacy program administered by ED under WIOA title II; the ES program administered by the Department and authorized by the Wagner-Peyser Act, as amended by WIOA title III; and the VR program administered by ED and authorized under title I of the Rehabilitation Act of 1973, as amended by WIOA title IV (VR program).”

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

These data collection efforts do not involve any special circumstances.

8. *If applicable, provide a copy and identify the data 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.

A Pre-Clearance Notice was published in the Federal Register on April 22, 2016 (81 FR 23751). No public comments were received.

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 grant funds that they receive.

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

ETA is responsible for keeping private the youth offender participant and performance data and will maintain 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. Given the emphasis placed in the juvenile justice system on keeping data private on juvenile offenders, the Department is working diligently to ensure 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 privacy of the data. ETA's Office of Information Systems and Technology (OIST) is an active participant in the development and approval of data security measures – especially as they apply to this Web-based system. Any information that is shared or made public by ETA is aggregated by grantees and does not reveal personal information on specific individuals. ETA will also need to emphasize to grantees their obligation to protect the identity of juvenile offenders that they serve and to maintain the confidentiality of juvenile justice information that they have accessed.

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.*

The main sensitive data that grantees will be collecting on participants relate to involvement in the juvenile or adult criminal justice system. We will encourage grantees to collect this information as far as possible from the juvenile and adult justice system rather than asking participants for this information. The collection of information on juvenile or adult criminal system involvement is necessary given that the funding for this set of grants comes from an appropriation expressly devoted to serving youthful offenders and youth at-risk of offending.

This request adds questions on immigration status, welfare receipt, mental health treatment, and child support obligations to the data collected at intake. Answers to these questions may help grantees better target appropriate supportive services on participants. These data items are not included in the quarterly progress report that grantees submit to DOL.

12. *Provide estimates of the hour burden of the collection of information.*

The annual national burden for Youthful Offender reporting has four components: (1) the participant data collection burden on grantees and enrollees; (2) the quarterly progress report burden; (3) the quarterly narrative report burden; and (4) the burden of collecting recidivism

information. This response provides a separate burden for each of these four components. The Department expects over the next few years to award 28 new Youthful Offender grants each year for two years of operation and up to one year of follow-up services and post-placement data collection. In any given year, this will result in 28 grants in their first year of operation, 28 grants in their second year of operation, and 28 grants providing follow-up services and tracking post-placement outcomes, for a total of 84 grants collecting data each year.

(1) Participant Data Collection Burden

The Youthful Offender **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 by grantees and the information provided by enrollees solely to comply with the federal reporting requirements. Youth offender grantees will have some additional burden to set up systems for tracking the participation of enrollees in program activities and for tracking the program outcomes of enrollees, but these tracking systems can be considered as data necessary to run the program. The data collection burden will vary by participant based on the range and intensity of services provided by the grantee as well as by the number of participants served.

Record Type	Hrs. Per Record	PY 16 Estimated National Count of Participants	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Participant, burden on grantee staff for collection	2.0	12,000	24,000	\$13.72	\$329,280

Record Type	Hrs. Per Record	PY 16 Estimated National Count of Participants	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Participant, burden on enrollee for information to intake person	.75	12,000	9,000	\$7.25 federal minimum wage rate	\$65,250

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 (December 2015, Current Employment Statistics Survey, U.S. Census Bureau). Source: http://www.bls.gov/opub/ee/2016/ces/table8a_201602.pdf. For enrollees, the federal minimum wage is used to approximate opportunity costs. For enrollees, the federal minimum wage is used to approximate opportunity costs.

(2) Quarterly Progress Report Burden

The **quarterly progress report burden** assumes that all grantees will 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.

Report	Hrs. Per Report	Number of Reports (84 grantees x 4 quarters)	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Quarterly Progress Report	20	336	6,720	\$13.72	\$92,198

(3) Quarterly Narrative Report Burden

The **quarterly narrative report burden** considers the time it will take the staff of grantees to prepare quarterly summaries of progress to date, challenges and concerns, items to be resolved, partnerships with other local agencies, success stories, and plans for the next quarter.

Report	Hrs. Per Report	Number of Reports (84 grantees x 4 quarters)	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Quarterly Narrative Report	16	336	5,376	\$13.72	\$73,759

(4) Recidivism Report Burden

The Recidivism Report Burden considers the time it will take adult and juvenile justice system staff to review individual juvenile and criminal records to determine which participants have been convicted of a new offense within 12 months of their release from a correctional facility or being placed on probation. This information will continue to be collected once a year, and will only require determining the recidivism of the subset of participants who reached the 12-month point since being released from a correctional facility or being placed on probation.

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Record Type	Hrs. Per Record	PY 12 Estimated National Count	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Recidivism Report	.5	12,000	6,000	\$13.72	\$82,320

The following table can be used as a guide to calculate the total burden of an information collection.

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Grantees' Participant Data Collection	84 grantees	Ongoing	12,000	2.0	24,000	\$13.72	\$329,280
Participant Data Disclosure	12,000 participants	Ongoing as participants enroll	12,000	0.75	9,000	\$7.25	\$65,250
Grantees' Quarterly Progress Report	84 grantees	Quarterly	336	20	6,720	\$13.72	\$92,198
Grantees' Quarterly Narrative Report	84 grantees	Quarterly	336	16	5,376	\$13.72	\$73,759
Juvenile Justice Agencies' Recidivism Report	84 justice agencies	Annually	12,000	.5	6,000	\$13.72	\$82,320
Unduplicated Totals	12,336	Varies	36,672	Varies	51,096	Varies	\$642,807

For private non-profit grantees, the hourly rate is the average hourly earnings in the Census Bureau's social assistance industry category (December 2015, Current Employment Statistics Survey, U.S. Census Bureau). Source: http://www.bls.gov/opub/ee/2016/ces/table8a_201602.pdf. For enrollees, the federal minimum wage is used to approximate opportunity costs. For enrollees, the federal minimum wage is used to approximate opportunity costs.

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).

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 use to collect and maintain participant data, apply edit checks to the data, and generate the quarterly reports. **Annual costs:** There are no annual costs, as ETA covers the annual maintenance costs for the free, web-based, data collection and reporting system.

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 annual cost of maintaining the system and providing training and technical assistance to grantees for using the system, including contractor and DOL staff time, is estimated to be \$390,000.

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

This request adds burden hours inadvertently not accounted for in the request three years ago for the time spent by grantees generating, reviewing, and correcting errors in the quarterly progress reports; increases the average burden to participants for the collection of intake data from 12 minutes to 45 minutes to make it more consistent with the burden to participants for the collection of information in similar Division of Youth services programs and to allow for extra time for the additional intake questions; increases the average burden for grantee staff to collect intake, service, and outcome information from 1.6 hours to 2 hours to allow for extra time for the additional intake questions and for tracking additional outcomes, and decreases the burden hours from 30 to 16 for grantees to complete the quarterly narrative reports to make it consistent with the average hours approved for the quarterly narrative reports of similar Division of Youth services programs. This adds 6,720 burden hours for the quarterly progress report, 6,600 burden hours for participants, 4,800 burden hours for grantee staff collection of information, and subtracts 4,704 burden hours from the quarterly narrative report, for a net effect of adding 13,416 burden hours to this request.

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.*

As required under WIOA Regulations at 683.300 (e)(2), grantees will continue to submit MIS performance reports on a quarterly basis to ETA within 45 days of the end of each quarter. ETA will aggregate the data provided by grantees in their reports and prepare quarterly reports showing the demographics and key outcomes of participants served by youthful offender grants. The quarterly reports prepared by ETA are available to the public on ETA's web site. ETA will also use the quarterly reports submitted by grantees to provide the number of participants served and key outcomes of youth offender grants in the annual budget request submitted to Congress.

ETA's portion of the annual budget request is available to the public on ETA's web site. No complex analytical techniques are contemplated.

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 topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions,"

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.