

JUSTIFICATION FOR NON-SUBSTANTIVE CHANGE REQUEST OVERVIEW OF CHANGES

ETA is requesting non-substantive changes to the Trade Adjustment Assistance Community College and Career Training (TAACCCT) Grants Reporting Package that grantees used to report their annual performance information on participants and their quarterly narrative information on program development, employer engagement and other information.

ETA's statutory and regulatory authority to administer these programs includes provisions for the requirement of performance reporting from grantees. The legislative authority for these programs comes from the American Recovery and Reinvestment Act of 2009 (19 U.S.C. 2372 - 2372a), which requires that ETA collect information from grantees regarding program performance and participant outcomes.

19 U.S.C. 2372 - 2372a requires that the Secretary prepare and submit to Congress an annual report regarding the programs and activities carried out under the TAACCCT grant program, providing:

- A description of each grant awarded during the preceding fiscal year
- An assessment of the impact of each award in a fiscal year preceding the fiscal year referred to in paragraph (1) on workers receiving training under the TAA for Workers Program

In addition, ETA uses the information grantees report 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 the programs
3. To provide management information for use in Federal program administration and oversight, including grant-specific participation, service, and outcome summaries
4. To fulfill ETA's compliance with the Government Performance and Results Act (GPRA) and to complete the OMB Performance Assessment Rating Tool (PART) review.

ETA is requesting approval for non-substantive changes for the TAACCCT forms and instructions approved under 1205-0489 because the changes are minor. The Department would like to note that minor changes to the forms and instructions have been previously accomplished through non-substantive changes approved by OMB in October 12, 2012 (ICR Reference Number 201208-1205-006) and February 11, 2015 (ICR Reference Number 201502-1205-003). These changes were regarding updates to data elements for Rounds 2, 3 and 4 from the first round and updates to the language on reporting for veterans respectively. The changes that are now being requested are similar in nature to the changes previously approved, as they also involve updates to information that is no longer current or relevant and to unclear and inconsistent language. None of the changes requested involves a change to the burden. Below is a summary of the two types of changes requested with more specific details:

1. Changes to Inconsistent or Unclear Language

- a) Making consistent the ambiguous language regarding annual versus cumulative reporting in the Instructions and the Annual Performance Report form to make it accurate
- b) Aligning the Annual Performance Report data element titles and numbering with the titles and numbering sequence used in the Instructions
- c) Strengthening language in some titles and definitions of data elements to further clarify what to report
- d) Aligning the description of the requirements to use administrative data to be consistent with the TAACCCT Solicitation for Grant Applications
- e) Changing minor information that is inaccurate (e.g., incorrect acronyms used, etc.)

2. Changes to Information No Longer Current

- a) Updating outdated links
- b) Removing information that is not applicable to the rounds currently active and is not accessible in the reporting system to these rounds

DETAILED BREAKOUT OF NON-SUBSTANTIVE CHANGES REQUESTED FOR OMB 1205-0489

Below is a summary of the requested changes. Please see the attached Instructions and Annual Performance Report with all edits and comments.

Changes to Inconsistent or Unclear Language

- Instructions: All references to cumulative reporting of participant data have been removed and/or replaced with language indicating that the grantees should report data on an annual basis, which is the correct manner in which they should report. This makes the language consistent throughout the instructions. These changes occur on the following pages: 2, 7, 9-12, and 14;
- Annual Performance Report Form: All references to cumulative reporting of participant data have been removed and replaced with language indicating that grantees should report data on an annual basis. The following changes were made:
 - Section B, which was previously titled “Cumulative Participant Outcomes (All Grant Participants)” has been updated to “Annual Participant Outcomes (All Grant Participants)”
 - Section C, which was previously titled “Cumulative Participant Summary Information (All Grant Participants)” has been updated to “Annual Participant Summary Information (All Grant Participants)”

- Instructions and Annual Performance Report Form: All data element titles and numbers have been aligned so that they match exactly, where previously there were language differences in original titles (see next item for additional updates to titles);
- Instructions and Annual Performance Report Form: Changes were made to some data element titles. The updates do not change what grantees are asked to report, but further clarify based on the definitions that follow the titles. The changes to the data element titles requested are as follows:
 - i. B.1 *Unique Participants Served/Enrollees* updated to **Unique Participants Enrolled**
 - ii. B.2. *Total Number Who Have Complete a Grant-Funded Program of Study* updated to **Total Number of Participants Who Have Completed a Grant-Funded Program of Study**
 - iii. B.3 *Total Number Still Retained in Their Program of Study (or Other Grant-Funded Programs)* updated to **Total Number of Participants Still Retained in Their Program of Study (or Other Grant-Funded Programs)**
 - iv. B.4 *Total Number Retained in Other Education Programs* updated to **Total Number of Participants Retained in Other Education Programs**
 - v. B.5 *Total Number of Credit Hours Completed (aggregate across all enrollees)* updated to **Total Number of Grant-Funded Credit Hours Completed**
 - vi. B.5a *Total Number of Students Completing Credit Hours* updated to **Total Number of Participants Completing Credit Hours**
 - vii. B.6 *Total Number of Earned Credentials (aggregate across all enrollees)* updated to **Total Number of Earned Certificates/Degrees**
 - viii. B.6. *Total Number of Students Earning Certificates (less than one year)* update to **Total Number of Participants Earning Certificates (less than one year)**
 - ix. B.6b *Total Number of Students Earning Certificates (more than one year)* update to **Total Number of Participants Earning Certificates (more than one year)**
 - x. B.6c *Total Number of Students Earning Degrees* update to **Total Number of Participants Earning Degrees**
 - xi. B.7 *Total Number Enrolled in Further Education after Program of Study Completion* updated to **Total Number of Participants Enrolled in Further Education After Program of Study Completion and Exit**
 - xii. B.8 *Total Number Employed after Program of Study Completion* updated to **Total Number of Participants Employed After Program of Study Completion and Exit**
 - xiii. B.9 *Total Number Retained in Employment after Program of Study Completion* updated to **Total Number of Participants Retained in Employment After Program of Study Completion and Exit**
 - xiv. B.10 *Total Number of Those Employed at Enrollment Who Receive a Wage Increase Post-Enrollment* updated to **Total Number of Participants Employed at Enrollment Who Receive a Wage Increase Post-Enrollment.**

- **Instructions:** Clarifying information has been added to some of the data element definitions. The changes include making the language consistent where different data elements refer to the same terms; moving relevant definitions of terms that are located elsewhere in the instructions to the data element where the term is used for grantee convenience; and updating language to assist grantees with selecting the proper data element for participants from year-to-year. These changes do not change what grantees are asked to report. The changes requested are shown below. Added language is italicized.
 - i. **B.1** Enter the ~~cumulative~~ *total* number of individuals who entered any of the grant-funded programs *of study* offered to date (including certificate or degree programs or other training activities). Participants should only be included once *in the year they first enroll*, even if they enroll in multiple programs *or are still enrolled in subsequent years*. A *program of study is broadly defined as an educational program in which a degree or certificate is earned*.
 - ii. **B.2** Enter the total number of unique participants (B.1) who completed any grant-funded program to date. Completion is defined as having earned all of the credit hours (formal award units) needed for the award of a degree or certificate in that program of study. Participants should only be included once, even if they complete multiple programs *of study*.
 - iii. **B.2a** Enter the total number of *incumbent workers (those employed-at enrollment)* who complete any grant-funded program to date. Completion is defined as having earned all of the credit hours (formal award units) needed for the award of a degree or certificate in that program of study. Participants should only be included once, even if they complete multiple programs.
 - iv. **B.5** Enter the total number of *grant-funded* credit hours ~~to date~~ that have been completed by *all* participants in certificate and degree programs ~~in~~ during the reporting year, *regardless of the year in which the participants enrolled*. This number should be reported *for all in aggregate across all enrollees*, even if the participant is no longer enrolled in the grant-funded program of study or did not complete the program *of study*.
 - v. **B.5a** Enter the total number of *participants students* that have completed any number of *grant-funded* credit hours *during the reporting year* ~~to date~~.
 - vi. **B.6** Enter the total number of degrees or certificates earned *during the reporting year* ~~to date~~ by participants *in for* grant-funded programs. This number should be reported ~~in aggregate across~~ *for all enrollees*, including multiple certificates and degrees earned by the same participant.

- vii. **B.6a** Enter the total number of ~~students~~ *participants* who earned certificates designed to be completed in one year or less. A ~~student~~ *participant* can be counted only once in this field, even if multiple certificates were earned by that ~~student~~ *participant*.
- viii. **B.6b** Enter the total number of ~~students~~ *participants* who earned certificates designed to be completed in one year or more. A ~~student~~ *participant* can be counted only once in this field, even if multiple certificates were earned by that ~~student~~ *participant*.
- ix. **B.6c** Enter the total number of ~~students~~ *participants* who earned degrees. A ~~student~~ *participant* can be counted only once in this field, even if multiple degrees were earned by that ~~student~~ *participant*.
- x. **B.7** Of the ~~total~~ number of participants who completed at least one grant-funded program (B.2), enter the total number of *participants* ~~individuals to date~~ who entered another program of study *after exiting the institution (grant-funded or not)*. Exit is defined as being no longer enrolled at the college in any program of study and can include formal withdrawal, expulsion, graduation, and other reasons. (Note: A participant counted in B.7 cannot not be counted again in B.8).
- xi. **B.8** Of the ~~total~~ number of participants *in the reporting year* who were not incumbent workers and who completed at least one grant-funded program of study (B.2), enter the total number of *participants* ~~individuals to date~~ who entered unsubsidized employment *after completion and were still employed* in the first quarter after the quarter in which the student exits the college. *Incumbent workers are defined as participants employed at enrollment*. Exit is defined as being no longer enrolled at the college in any program of study and can include formal withdrawal, expulsion, graduation, and other reasons. (Note: A participant counted in B.7 cannot be counted in B.8; a participant counted in B.8 may be counted again in B.9).
- xii. **B.9** Of the *non-incumbent* participants who were employed in the first quarter after the quarter in which the student exits the college (B.8), enter the total number of *participants* ~~individuals to date~~ who were employed in the second and third quarters after exit, *regardless of whether they entered employment in this reporting year or the previous reporting year*. *Incumbent workers are defined as participants employed at enrollment*. Exit is defined as being no longer enrolled at the college in any program of study and can include formal withdrawal, expulsion, graduation, and other reasons. (Note: A participant counted in B.9 *must have been* ~~should be~~ counted in B.8).
- xiii. **B.10** Of the number of incumbent workers (~~those employed at enrollment~~) who enter a grant-funded program, enter the ~~total~~ number who received an increase in their wages at any time after becoming enrolled. *Report the first wage increase only and report the*

wage increase in the reporting year in which it occurred. Incumbent workers are defined as participants employed at enrollment.

- Instructions: Changing the word “must” to “may” in the section on tracking follow-up outcomes and the use of administrative data to align with the Solicitation for Grant Applications and with ETA’s expectations that grantees should make an effort to use this data but that it is not a requirement;
- Instructions: Updating all acronyms to accurately reflect their proper names, such as where the Trade Adjustment Assistance Community College and Career Training grants are referred to as TACT, this has been updated to TAACCCT, and where the Quarterly Narrative Progress Report has been referred to as a QPR, this has been updated to QNPR. In addition, there was an error made on p.2 where it is stated that consortia leads should report annual performance data each *quarter*. This has been updated to say “year,” as grantees only report on their participants on an annual basis. Finally, in Section F, grantees are asked to provide the average duration for TAA workers to complete training. The words “provided in weeks” were added to specify the unit of measure to be used.

Changes to Information No Longer Current

- Instructions: Two Internet links in the instructions were outdated and needed to be changed, on p. 3 and p. 8;
- Instructions: There have been four rounds of TAACCCT, and Rounds 2, 3 and 4 were substantially different in terms of reporting than the first round. There are several references to information that pertains to Round 1 reporting only, specifically: cohorts and comparison data, progress and implementation measures, Table 2, and Section E (evidence-based or technology-enabled strategies). All of these references have been removed from the following pages: 2, 5, 7, 14. In addition, pages 16-23 of the instructions should be removed as they have no relevance to Rounds 2, 3, and 4.