

SUPPORTING STATEMENT
Workforce Innovation Fund Grants Reporting and Recordkeeping Requirements
OMB Control No. 1205-0515

A. Justification.

The Department of Labor (DOL), Employment and Training Administration (ETA) request to extend reporting and recordkeeping requirements, with no changes, for the Workforce Innovation Fund (WIF) Grants [SGA/DFA PY-11-05], the Consolidated and Further Continuing Appropriations Act, 2013 (P.L. 113-6), and the Consolidated Funding Act, 2014 (P.L. 113-76). The reporting structure features quarterly performance narrative reports that document the innovative strategies and collect information about effective practices and “lessons learned” from the diverse projects funded by the WIF. All data collection and reporting is done by grantee organizations (state and local governments).

The current ICR authorization expires June 30, 2017, and all 26 Round 1 grantees will have completed their grants. Grantee reporting for Rounds 2 and 3 may continue until as late as March 31, 2020. The Department requests approval to continue information collection to meet the reporting and recordkeeping requirements of the WIF grant program through the end of all grantee reporting cycles.

These performance reporting requirements align with outcome categories identified in the SGA used to award the WIF grants, as noted above. The quarterly performance narrative reports provide a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter. Specifically, these reports include aggregate information on participants’ grant progress and accomplishments, grant challenges, grant technical assistance needs and success stories and lessons learned. The performance outcomes are defined by each grantee; each grant has a unique set of performance goals and outcome measures according to the specific innovation and project being pursued in the grant. The performance narrative reports, to be completed quarterly, include a narrative of grant activities and the unique grant performance and evaluation measures and key project milestones identified by the grantees. As a result, the performance measures for each grant will be different.

The collection of this data helps ETA report the impact of the WIF funds and provide ETA with comprehensive information on the status of each individual grant. This data will assist ETA to provide targeted technical assistance to the grantee based on individual needs in an effort to support and improve grant outcomes. The information provided in the quarterly performance narrative reports, including the lessons learned through innovative projects, are necessary for increasing the body of knowledge about what works in workforce development. The individual performance metrics for each grant allows each grantee to report on the unique processes and outcomes for their project.

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 WIF was created as a grant program by the Full-Year Continuing Appropriations Act, 2011 (in Sec. 1801, Title VIII, Div. B of PL 112-10); the Consolidated and Further Continuing Appropriations Act, 2013 (P.L. 113-6), and the Consolidated Funding Act, 2014 (P.L. 113-76). According to these Acts, the WIF was established to “carry out projects that demonstrate innovative strategies or replicate effective evidence-based strategies that align and strengthen the workforce investment system in order to improve program delivery and education and employment outcomes for program beneficiaries.” One of the purposes of the WIF grants is to contribute to the documentation of evidence-based practice within the field of workforce development. In applying for WIF grants, grantees agreed to meet ETA’s reporting requirements as indicated in the Solicitations for Grant Applications (SGA/DFA PY-11-05) and (SGA/DFA PY-13-06), and Funding Opportunity Announcement (FOA) (FOA-ETA-15-10) which require the submission of quarterly reports within 45 days after the end of the quarter. Currently, the WIF grantees submit a quarterly narrative in whatever format they choose, though ETA provides a suggested format.

Data collection for the 26 Round 1 grants will have ended before this collection extension begins. Only 11 grants from Round 2 and 6 from Round 3 remain active and will continue to report their performance.

Each grantee created a performance accountability framework that identified performance and evaluation measures in the grant. After the grant was awarded, each grantee submitted a performance tracking template that included the performance and evaluation measures for the project as well as the key project milestones. The suggested quarterly performance narrative report format that ETA provides to the grantees is Attachment A.

Traditionally, ETA tracks the success of its workforce investment programs in terms of common measures (e.g., job placement, retention, earnings, etc.). While many WIF grants may continue to use these measures, ETA encourages WIF projects to identify and capture new sets of data that align with the innovative activities, outputs and outcomes described in the grant, thereby allowing grantees and ETA to document a new set of achievements. For example, there are seven main types of grants (interventions) funded under WIF 1, including Industry Career Pathways MIS New Population Service Providers/New Service Change Management and Online Delivery. Some training grants will collect outcome measures similar to ETA’s Common Measures, but grantees have identified performance measures that are unique to their project such as percentage of participants that become self-employed, number of apprentices in program, attainment of permanent housing and number of employers accessing online registry.

The performance narrative report is submitted on a quarterly basis by all WIF grantees. These quarterly performance narrative reports are the primary mechanism through which ETA will understand the significant innovations and successes, the challenges encountered and strategies for resolution, and technical assistance needs to ensure the successful implementation of projects.

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.

Grantees are expected to submit a quarterly progress report, called a performance narrative report, within 45 days after the end of each calendar year quarter. The report must include quarterly information regarding grant activities. The last quarterly progress report that grantees submit will serve as the grant's Final Performance Report.

The information from these reports will be used by the DOL and ETA to evaluate performance of the WIF projects and collect lessons that were learned in terms of processes, strategies and performance from the projects. ETA uses the data to help inform policy about the workforce and possible changes in structures and policies that enable a closer alignment and integration of workforce development, education, human services, social insurance, and economic development programs. ETA also uses the data to provide technical assistance to support improvement of individual grantee outcomes.

Within ETA, the data is used by the Offices of Workforce Investment, Policy Development and Research, Financial and Administrative Management, Information Systems and Technology, and Regional Management (including the regional offices). Other DOL users include the Offices of the Assistant Secretary for ETA and Assistant Secretary for Policy.

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.

In compliance with the Government Paperwork Elimination Act (GPEA), ETA streamlined the collection of data by leveraging each grantee's existing technology rather than developing a unique reporting system with attendant portal, software, etc. Grantees may report on the suggested quarterly reporting template or a similar one, using whatever existing technology they have to collect the data, i.e. word processing and any spreadsheets they choose to develop for their own tracking purposes. Grantees will email their quarterly reports to 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.

Because each of the WIF grantees is attempting to implement an innovative approach, this data collection effort does not represent duplication of existing/available data. There is no other source for the information that will be collected in the quarterly performance narrative reports. Data items collected by the performance narrative reports are needed to: (1) account for the specific services and activities implemented by each grantee; (2) build a body of knowledge about effective practices and "lessons learned" about innovative strategies in the workforce system; and (3) enable ETA to provide targeted technical assistance so that grantees can achieve the best outcomes possible. Information collected on the WIF grants is not available through any other data collection or report system.

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

This collection does not impact small businesses.

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.*

29 CFR 95.51(b) (59 F.R. 38271, July 27, 1994), which governs monitoring and reporting program performance under grants and agreements with non-profit organizations, states that DOL shall prescribe the frequency with which performance reports shall be submitted, and that performance reports shall not be required more frequently than quarterly or, less frequently than annually. Although these requirements do not directly apply because the WIF grantees include only State Agencies, Local Workforce Investment Boards and consortia of those entities, this regulation sets a standard for frequency of reporting and data collection. In applying for WIF grants, grantees agreed to meet ETA's reporting requirements as indicated in the Solicitations for Grant Applications (SGA/DFA PY-11-05) and (SGA/DFA PY-13-06), and Funding Opportunity Announcement (FOA) (FOA-ETA-15-10), which require the submission of quarterly reports within 45 days after the end of the quarter. Additionally, collecting reports less frequently would severely compromise ETA's ability to monitor the progress of the grants, build a body of knowledge regarding these innovative projects and provide effective technical assistance to the grantees.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5:*

None of the data collection efforts 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.

In accordance with the Paperwork Reduction Act of 1995, the public was allowed 60 days to comment through the Federal Register Notice posted on December 23, 2016 (81 FR 94422). No public comments were received.

As part of the development of the Solicitation for Grant Application for the WIF grants, ETA consulted with various Federal agency partners, including the Department of Education, Health and Human Services and Office of Management and Budget staff, for feedback on data collection instruments, types of data collection, and the availability of data, as well as the overall program design and reporting requirements for the WIF grants.

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 funds provided under the grant agreement.

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 protecting the privacy of the WIF 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. This data is covered by a System of Records Notice, DOL/ETA-15, published April 8, 2002 (67 FR 16898 et seq.). The quarterly performance narrative reports do not require the submission of individually identifying data. Nevertheless, DOL is working diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted. All contractors with access to individually identifying information are required to provide assurances that they will respect and protect the privacy of the data.

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 quarterly performance narrative reports do not require the submission of sensitive data.

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

The annual national burden for WIF data collection has two components: (1) the respondent data collection burden; and (2) the data collection cost burden. This response provides the total burden.

(1) Respondent Data Collection Burden

The WIF data collection burden considers the amount of participant and performance-related information collected 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 solely to comply with Federal reporting requirements. The collection burden will vary by participant based on the range and intensity of services provided by the grantee. For example, data collection may involve acquiring information from various partners regarding employment

training and placement, and the outcomes reported in the performance reports are different for each grant. To reduce grantee burden, each grantee will report only on performance measures previously identified as specifically applicable to that grant.

Quarterly Performance Narrative Report Burden

The WIF quarterly performance narrative report burden involves providing a detailed account of all activities undertaken during the quarter including in-depth information on accomplishments, promising approaches, progress toward performance outcomes, and upcoming grant activities. Key issues, technical assistance needs, best practices, and lessons learned should also be included in the quarterly narrative report. ETA assumes each grantee will spend approximately twenty hours per quarter preparing the report. This estimate is based on the calculations made for the H-1B Technical Skills Training Grants (OMB Control Number 1205-0507), which have similar quarterly performance narrative report formats. The hour burden estimate assumes that grantees will define the performance outcomes appropriate for their unique grants. As a result, the outcome performance measures are different for each grant. The hour burden estimate includes compiling and reviewing the information quarterly.

The estimate for the data collection burden hours is based on consultation with similar programs.

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
Quarterly Performance Narrative Report	17	Quarterly	68	20 hours	1,360	\$16.37*	\$22,263.20
Unduplicated Totals	17		68		1,360		\$22,263.20

*Hourly rates used to calculate costs depend upon the type of organization administering the program. Costs above are based on the most current BLS data for Office Administrative Services personnel, mean national wage rate. <http://www.bls.gov/oes/current/oes430000.htm>

13. Provide an estimate for 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 already reflected on the burden worksheet).

- a) **Start-Up/Capital Costs:** There are no start-up costs because no additional processes or systems are required beyond those needed to manage the project.

b) Annual Costs: There are no annual costs because no additional processes or systems are required beyond those needed to manage the project.

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.

No additional processes or systems are required beyond those needed to manage the project. However, collecting, organizing, analyzing and reporting on grantee performance will require a minimum of 40 hours per quarter for a workforce analyst. For a GS-11, Step 1 staff member, this cost is estimated at \$31.98/hour: \$1,279 per quarter for an approximate total of \$5,116 per year. <https://www.federalpay.org/gs/locality/washington-dc>.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

There is a decrease in total burden because the 26 Round 1 grants will have ended when this extension begins. Only 11 Round 2 and 6 Round 3 grantees will continue to report performance. There is no change in the per grantee burden.

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.

Grantees will submit performance narrative reports on a quarterly basis to ETA within 45 days of the end of each quarter. Quarterly report data will be analyzed by ETA staff and used to evaluate performance outcomes and program effectiveness.

Each year, ETA issues a report summarizing program performance based on the Secretary's goals. Data contained in the quarterly reports may be included in these reports. The data will also be used to prepare Government Performance and Results Act (GPRA) reports, management and budget reports, and other ad hoc reports. All reports are available on the Internet and accessible to the public.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date is displayed.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.