

SUPPORTING STATEMENT
Workforce Innovation and Opportunity Act Joint Quarterly Narrative Performance
Report
OMB Control No. 1205-0448

A. Justification.

This is a justification for the Department of Labor’s request to revise a currently approved data validation requirement. This revision will allow ETA to continue the Senior Community Service Employment Program (SCSEP) approved data validation while also adding a streamlined quarterly narrative report template to support the 1) reporting, 2) recordkeeping, and 3) program evaluation requirements for the following grant programs: National Dislocated Worker Grants (DWG), H-1B grant programs (started July 1, 2016 or later), National Farmworker Jobs Program (NFJP), Reentry Employment Opportunities (REO) youth and adult grant programs, SCSEP, and YouthBuild (YB). This information collection does not increase the burden on grantees.

SCSEP data validation assesses the accuracy of data collected and reported to ETA on program activities and outcomes. The accuracy and reliability of program reports submitted by states and grantees using federal funds are fundamental elements of good public administration, and are necessary tools for maintaining and demonstrating system integrity. The data validation requirement for employment and training programs strengthens the workforce system by ensuring that accurate and reliable information on program activities and outcomes is available. The **WIOA Joint Quarterly Narrative Performance Report** provides a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter. It also provides information on grant challenges and timeline progress, as well as the opportunity to share success stories.

Grantees currently provide quarterly narrative reports through ETA-provided, Web-based management systems that already exist and are currently in use by the grantees, or by email to Federal Project Officers where such systems do not exist. Additionally, the use of standardized narrative reports supports **Workforce Innovation and Opportunity Act (WIOA)** implementation and assists in identifying areas of technical assistance need consistently across the discretionary programs that are reporting on WIOA performance indicators. The use of a consistent narrative template furthers the goals of WIOA around system alignment and consistency of reporting, which helps to improve the quality of performance information that is received by ETA.

All data collection and reporting will be done by grantee organizations (i.e. state or local government, not-for-profit, or faith-based and community organizations) or their sub-grantees.

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.*

Grantees receiving funding under Title V of the Older American Act are required to maintain and report accurate program and financial information (20 CFR 641.879). Further, grantees receiving SCSEP funding from ETA are required to submit reports or participant records and attest to the accuracy of these reports and records.

The Department's Office of Inspector General (OIG) conducted an audit of performance data oversight from July 2000 through October 2001. The audit, released in September 2002, found that, "Because of insufficient local, state, and Federal oversight, the Employment and Training Administration (ETA) has little assurance that the state-reported WIA performance outcomes data are either accurate or verifiable." The OIG recommended that states should validate reported data using rigorous validation methodology. To address the concerns raised by the OIG and to meet the Agency's goal for accurate and reliable data, ETA implemented a data validation requirement in order to ensure the accuracy of data collected and reported on program activities and outcomes.

ETA has developed a process for validating data submitted by states and grantees. Data validation consists of two parts:

- 1) **Report validation.** ETA assures the validity of SCSEP aggregate reports by using the SCSEP Performance and Reporting System to automatically generate the grantee-level aggregate reports based on the grantee's individual record files entered into the system and the performance reporting specifications for the quarterly and final year-end report. Edits built into the system assure the validity of SCSEP's performance reports. No additional approval is sought for SCSEP report validation.
- 2) **Data element validation** appraises the accuracy of the data entered into the SCSEP Performance and Reporting System. Data element validation is conducted by manually reviewing annual samples of participant records with respect to their underlying source documentation in an effort to (1) underwrite the accuracy of the data contained in the automated system and (2) to affirm compliance with program-specific Federal definitions and requirements. The results of data element validation are utilized to identify areas on which to focus system and grantee resources in order to systematically improve program management over time.

This approach addresses the two fundamental sources of reporting errors within ETA program data: data collection or entry error; and inaccurate computation of the required aggregate reports at the grantee level. If the data collected are systematically incorrect or data entry errors routinely occur, then the performance information will not be accurate even though the SCSEP Performance and Reporting System is used to produce the aggregate reports. Data element validation addresses this issue by comparing performance-related data in each grantee's participant record files to the original data in the source files and determining an error rate that indicates the degree of accuracy of each data element used in calculating the grantee's performance results, eligibility determinations, or reported compliance with program requirements.

SCSEP program staff has been conducting data validation since 2007. Program staff received training prior to the implementation of data validation and continues to receive ongoing training and technical assistance from ETA's data validation contractor and program staff throughout the validation process. Previous experience with data validation has indicated the following:

- Grantees are able to conduct data validation with a reasonable, but sustained, level of effort.
- The validation process allows grantees to identify and address reporting errors.

On the basis of the significant benefits of data validation along with its minimal burden going forward, ETA seeks to extend the existing data validation requirement for SCSEP.

SCSEP grantees use the SCSEP Performance and Reporting System to access all information required for data element validation, to enter their validation of each data element, and to generate reports of the results of their validation. The SCSEP Data Validation Handbook and Data Collection Handbook provide a more detailed explanation of the validation process and provide standards and specifications for each data element required to be validated. These handbooks are made available electronically through the Older Worker Community of Practice (olderworkers.workforcegps.org).

For the **WIOA Joint Quarterly Narrative Performance Report**, NFJP and YouthBuild grants are authorized under the Workforce Innovation and Opportunity Act of 2014 (PL 113-128), also known as WIOA, which identified performance accountability requirements for these grants. The WIOA performance indicators and reporting requirements also apply to the DWG program. While H-1B and Reentry Employment Opportunities (REO) grants are not authorized under WIOA, these programs are also adopting the WIOA performance indicators and align with WIOA data element definitions and reporting templates to promote consistency across these DOL-funded programs. SCSEP, authorized under the Older Americans Act, as amended (PL 114-144), as described previously, is also adopting some of the WIOA performance measures and, for this reason, will also adopt the **WIOA Joint Quarterly Narrative Performance Report** once its data system is able to generate the information required.

To support these legislative requirements, in applying for the DWG, H-1B, NFJP, REO, SCSEP, and YouthBuild grants, grantees agreed to submit participant-level data quarterly for individuals who receive services through these programs. The reports include aggregate data on demographic characteristics, types of services received, placements, outcomes, and follow-up status using shared data elements. Using a shared narrative template furthers the WIOA legislative requirements and ensures that grantees are fully describing WIOA-related activities that ensure strong performance management.

Further, in December 2013, the Office of Management and Budget released the Final Rule on Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. This Final Rule streamlined the federal government's guidance on grant management and placed requirements on specific information that grantees should report to their federal funders. The use of a joint narrative report template ensures that each of these grant programs is

meeting the Uniform Guidance requirements related to narrative grant reporting as laid out in the Final Rule.

ETA uses data collected from the narrative report to demonstrate to Congress and the public the progress and success of these grants; hold grantees accountable for the Federal funds they receive; and support oversight, management, and technical assistance efforts.

- 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 uses SCSEP data validation results to evaluate the accuracy of data collected and reported to ETA on program activities and outcomes. This information collection enables ETA to assure its customers, partners, and stakeholders of the validity of performance data underlying this program.

Additionally, ETA uses the information collected in the quarterly narrative reports to ensure grantees are effectively managing their programs, meeting the milestones and objectives as described in their grant statements of work, and to identify areas where grantees may need additional technical assistance or monitoring. These reports will also help ETA to identify promising practices under WIOA.

Within ETA, the reports may be 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.

The reports and other analyses of the data will be made available to the public through publication and other appropriate methods and to the appropriate congressional committees through copies of such reports, including the ETA's Quarterly Workforce System Results Report.

- 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.*

ETA knows of no technical obstacles to continuing the SCSEP data validation requirement and implementing the joint quarterly narrative performance reporting. 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 uniform expectations of narrative information that should be shared across grant programs. The narrative report will be submitted to ETA via existing reporting systems or via email to the assigned Federal Project Officer in order to concur with the above objective.

ETA developed web based software that grantees use to conduct SCSEP data validation:

- **Software** developed by ETA generates samples, worksheets, and reports on data accuracy. For report validation, the SCSEP Performance and Reporting System is used to automatically generate the aggregate reports that are accessible to grantees. For data element validation, the system generates a random sample of the participant records and data elements for the grantee to validate. The system produces worksheets on which the validator records information after checking the source documentation in the sampled case files. The system calculates error rates for each data element, with confidence intervals varying with the size of the sample, from 3.5 percent to 4 percent.
- **User handbooks** are available that provide detailed information on completing data element validation. The handbooks also explain the validation methodology, including sampling specifications and validation instructions for each data element to be validated.

Currently, all grantees use the data validation page within the SCSEP Performance and Reporting System to conduct validation for SCSEP. Grantees can obtain technical assistance on validation procedures and the use of the validation tools from ETA's data validation contractor and national office staff. The system uses the validation data provided by the grantees to produce validation summary reports.

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.*

The Department holds grantees accountable by requiring them to identify and work toward comprehensive performance standards that are validated and establishing quarterly reports for competitive projects. WIOA and the Uniform Guidance are new requirements on grantees and therefore, have not been in use previously. The **WIOA Joint Quarterly Narrative Performance Report** is a new template to ensure adherence to these requirements. Neither the SCSEP data validation requirement nor the narrative performance report duplicates any existing ETA requirement.

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

For reporting and data validation purposes, the involvement of small businesses or other small entities that are not grantees or sub-grantees is extremely limited. The only time contacting them may be required is during the provision of a service. Methods to minimize the burden on small entities that are grantees or sub-grantees are discussed in other sections of this supporting statement.

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.*

As mentioned in Section A1, a concern was raised in the past related to the monitoring and inability to assure, consistently, the validity of performance outcomes. ETA regional staff continues to conduct data quality reviews based on current SCSEP data validation efforts to determine if grantees are in compliance with data validation guidelines. The proposed continuation of the data validation requirement will allow SCSEP to continue to address these issues. If data validation is discontinued, SCSEP will not be able to ensure that critical data used for performance reports and accountability purposes, and for other management purposes, are reliable.

2 CFR 200.328 (78 F.R. 78589, December 26, 2013), which governs monitoring and reporting program performance under grants and agreements, 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. If ETA does not comply with these requirements, funding for demonstration programs would be compromised. In applying for grants from the programs described in the Justification section, grantees agree to meet ETA's reporting requirements as indicated in the Funding Opportunity Announcements, which requires the submission of quarterly reports within 45 days after the end of the quarter.

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.*

This request is consistent with 5 CFR 1320.5.

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 16, 2016 (81 FR 91200). No public comments were received.

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

This information collection does not involve direct payments to respondents. ETA does provide grant funding to the participating grantees, which are listed as the respondents for purposes of the Paperwork Reduction Act. The requirement to submit quarterly narrative performance reports derives from grantees' responsibility to provide accurate information on program activities and outcomes to ETA. Grantees are expected to provide resources from the administrative funds allowed under their grant agreements for the narrative performance reporting effort. Submission of performance reports is a basic responsibility of grantees, which are required to report program performance, under Department of Labor regulations (29 CFR 95.51).

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

Participant record layouts used in data validation for SCSEP utilize unique individual identifiers rather than Social Security Numbers (SSNs). To protect the privacy of program participants, the validation system never receives an SSN and includes user functionality that allows program administrators to limit access to data validation information. Only validators designated by the program administrator have access to validate records. No other means of access to these data is permitted.

For the **WIOA Joint Quarterly Narrative Performance Report**, no individual-level data is requested under the joint quarterly narrative performance report. This report involves the receipt and review of aggregate-level narrative information submitted to ETA and so contains no private information. While this information collection makes no express assurance of confidentiality, ETA is responsible for protecting the privacy of 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. This data is covered by a System of Records Notice, DOL/ETA-15, published April 8, 2002 (67 FR 16898 et seq).

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 data collection includes no questions of a sensitive nature.

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

The completion of the SCSEP data validation and the joint quarterly narrative performance report is estimated to require an annual burden of 41,420 hours. See Table 1 below for additional

information. The estimated annual hours needed to conduct SCSEP data validation is 162 hours on average per grantee and 11,340 hours for all grantees.

Quarterly narrative performance 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. ETA assumes each grantee will spend approximately ten hours per quarter preparing this report. ETA calculated the estimated number of grantees based on the number of active DWG, H-1B, NFJP, REO, SCSEP, and YouthBuild grants over the life of these reporting requirements, if approved.

Table 1 – Annual Estimation of National Burden Hours

Report	Hours per Year per Grantee	Estimated Number of Grantees	Annual National Burden Hours
SCSEP Quarterly Data Validation	162 (40.5 hours per quarterly report x 4 quarters)	70	11,340
Quarterly Narrative Performance Report – DWG	40 (10 hours per quarterly report x 4 quarters)	159	6,360
Quarterly Narrative Performance Report – H-1B	40 (10 hours per quarterly report x 4 quarters)	85	3,400
Quarterly Narrative Performance Report – NFJP	40 (10 hours per quarterly report x 4 quarters)	63	2,520
Quarterly Narrative Performance Report – REO Youth & Adult	40 (10 hours per quarterly report x 4 quarters)	165	6,600
Quarterly Narrative Performance Report – SCSEP	40 (10 hours per quarterly report x 4 quarters)	70	2,800
Quarterly Narrative Performance Report – YB	40 (10 hours per quarterly report x 4 quarters)	210	8,400
TOTALS		822	41,420

Table 2 - Calculation of Annual Burden for SCSEP Data Validation

Data Validation	Hours per Year per Grantee	Estimated Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
SCSEP	162	70	11,340	\$19.27/\$26.41	\$283,295.88

Table 3 - Calculation of Annual Burden by Program for Joint Quarterly Narrative Performance Report

Report	Hours per Year per Grantee	Estimated Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Narrative Progress Report – DWG	40 (10 hours per quarterly report x 4 quarters)	159	6,360	\$19.27/\$26.41	\$145,119.60
Quarterly Narrative Progress Report – H-1B	40 (10 hours per quarterly report x 4 quarters)	85	3,400	\$19.27/\$26.41	\$77,513.20
Quarterly Narrative Progress Report – NFJP	40 (10 hours per quarterly report x 4 quarters)	63	2,520	\$19.27/\$26.41	\$49,131.60
Quarterly Narrative Progress Report – REO Youth & Adult	40 (10 hours per quarterly report x 4 quarters)	165	6,600	\$19.27/\$26.41	\$150,601.20
Quarterly Narrative Progress Report – SCSEP	40 (10 hours per quarterly report x 4 quarters)	70	2,800	\$19.27/\$26.41	\$69,949.60
Quarterly Narrative Progress	40 (10 hours per quarterly report x 4 quarters)	210	8,400	\$19.27/\$26.41	\$191,856.00

Report – YB	quarters)				
TOTALS		752	30,080		\$684,171.20

Table 4 – Calculation of Combined Annual Burden for Joint Quarterly Narrative Performance Report

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
SCSEP Data Validation	70	Quarterly	280	40.5 hrs.	11,340	\$19.27/ \$26.41	\$43,704.36/ \$239,591.52
Quarterly Narrative Progress Report	752	Quarterly	3,008	10 hrs.	30,080	\$19.27/ \$26.41	\$297,528.80/ \$386,642.40
Unduplicated Totals	822		3,288		41,420		\$967,467.08

* The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For private non-profit grantees and Federally-recognized tribes, the hourly rate is the average hourly earnings in the civic and social organizations industry, CES code 80313400 (April 2017, CES survey, U.S. Census Bureau, <http://data.bls.gov/PDO/outside.jsp?survey=ce>). For state, county, and U.S. territory government grantees, the hourly rate is the estimated average hourly earnings for employees in the administration of economic programs industry, NAICS code 926110 (CY 2015, Quarterly Census of Employment and Wages, Bureau of Labor Statistics, <http://data.bls.gov/pdq/querytool.jsp?survey=en>).

Table 5 – Disaggregated Summary Calculation of Annual Burden for Grantees for SCSEP Data Validation

Type of Grantee	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr	Monetized Value
SCSEP Total	70	4	280	40.5	11,340	\$19.27/ \$26.41	\$283,295.88
Private Sector (Non-Profits)	14	4	56	40.5	2,268	\$19.27	\$43,704.36
State, Local, or Tribal Government	56	4	224	40.5	9,072	\$26.41	\$239,591.52

Table 6 – Disaggregated Summary Calculation of Annual Burden for Grantees for Joint Quarterly Narrative Performance Report

Grant Program	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr	Monetized Value
DWG Total	159	4	636	10	6,360	\$19.27/ \$26.41	\$61,664/ \$83,455.60
Private Sector	80	4	320	10	3,200	\$19.27	\$61,664
State, Local, or Tribal Government	79	4	316	10	3,160	\$26.41	\$83,455.60
H-1B Total	85	4	340	10	3,400	\$19.27/ \$26.41	\$33,144.40/ \$44,368.80
Private Sector	43	4	172	10	1,720	\$19.27	\$33,144.40
State, Local, or Tribal Government	42	4	168	10	1,680	\$26.41	\$44,368.80
NFJP Total	63	4	252	10	2,520	\$19.27/ \$26.41	\$47,018.80/ \$2,112.80
Private Sector	61	4	244	10	2,440	\$19.27	\$47,018.80
State, Local, or Tribal Government	2	4	8	10	80	\$26.41	\$2,112.80
REO Youth & Adult Total	165	4	660	10	6,600	\$19.27/ \$26.41	\$63,976.40/ \$86,624.80
Private Sector	83	4	332	10	3,320	\$19.27	\$63,976.40
State, Local, or Tribal Government	82	4	328	10	3,280	\$26.41	\$86,624.80
SCSEP Total	70	4	280	10	2,800	\$19.27/ \$26.41	\$10,791.20/ \$59,158.40
Private Sector	14	4	56	10	560	\$19.27	\$10,791.20
State, Local, or Tribal Government	56	4	224	10	2,240	\$26.41	\$59,158.40
YB Total	210	4	840	10	8,400	\$19.27/ \$26.41	\$80,934/ \$110,922
Private Sector	105	4	420	10	4,200	\$19.27	\$80,934
State, Local, or Tribal	105	4	420	10	4,200	\$26.41	\$110,922

Government							
All Grantees Total	752	4	3,008	10	30,080	\$19.27/ \$26.41	\$297,528.80/ \$386,642.40

Table 7 - Calculation of Annual Burden for DWG for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Hours	Rate in \$/hr	Monetized Value
Private Sector (Non-Profits)	80	40 (per grantee)	\$19.27	\$61,664
State, Local or Tribal Government	79	40 (per grantee)	\$26.41	\$83,455.60
All Grantees	159	6,360	--	\$145,119.60
Avg. per Grantee	--	40	--	\$912.70

Table 8 - Calculation of Annual Burden for H-1B for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Hours	Rate in \$/hr	Monetized Value
Private Sector (Non-Profits)	43	40 (per grantee)	\$19.27	\$33,144.40
State, Local or Tribal Government	42	40 (per grantee)	\$26.41	\$44,368.80
All Grantees	85	3,400	--	\$77,513.20
Avg. per Grantee	--	40	--	\$911.92

Table 9 - Calculation of Annual Burden for NFJP for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Hours	Rate in \$/hr	Monetized Value
Private Sector (Non-Profits)	61	40 (per grantee)	\$19.27	\$47,018.80
State, Local or Tribal Government	2	40 (per grantee)	\$26.41	\$2,112.80
All Grantees	63	2,520	--	\$49,131.60
Avg. per Grantee	--	40	--	\$779.87

Table 10 - Calculation of Annual Burden for REO Youth and Adult for Joint Quarterly Narrative Performance Report

Table 11 - Calculation of Annual Burden for SCSEP for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Hours	Rate in \$/hr	Cost
Private Sector (Non-Profits)	14	40 (per grantee)	\$19.27	\$10,791.20
State, Local, or Tribal Government	56	40 (per grantee)	\$26.41	\$59,158.40
All Grantees	70	2,800	--	\$69,949.60
Avg. per Grantee	--	40	--	\$999.28

Table 12 - Calculation of Annual Burden for YouthBuild for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Hours	Rate in \$/hr	Monetized Value
Private Sector (Non-Profits)	105	40 (per grantee)	\$19.27	\$80,934
State, Local or Tribal Government	105	40 (per grantee)	\$26.41	\$110,922
All Grantees	210	8,400	--	\$191,856
Avg. per Grantee	--	40	--	\$913.60

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, as the **Joint Quarterly Narrative Performance Report** can be developed using basic word processing software and submitted via existing web-based reporting systems or via email.

b) Annual Costs: There are no annual costs, as ETA is already providing access to the web-based reporting platforms as covered under separate Information Collection Requests or submission via the existing DOL email server.

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.

Federal costs are the staff costs required to review submissions of quarterly narrative performance reporting as outlined in Table 4 below. Costs for ETA staff to review submitted quarterly narrative performance reports will be \$156,429 per year for continuing operations.

Table 13 - Cost of SCSEEP Data Validation and Quarterly Narrative Performance Review Reporting to Federal Government

Continuing Operations Per Year to Support SCSEEP Data Validation and Quarterly Narrative Report Submission	
3 GS-13 in Region 1 (1/20 time)	\$14,178
3 GS-13 in Region 2 (1/20 time)	\$13,858
3 GS-13 in Region 3 (1/20 time)	\$13,503
3 GS-13 in Region 4 (1/20 time)	\$13,717
3 GS-13 in Region 5 (1/20 time)	\$14,192
3 GS-13 in Region 6 (1/20 time)	\$15,458
8 GS-13 in National ETA Office (1/20 time)	\$37,917
6 GS-14 in National ETA Office (1/20 time)	\$33,606
Total Cost	\$156,429

Note: Staff costs are based on the relevant locality pay for Salary Tables as available in the 2017 General Schedule (GS) Locality Pay Tables (Step 1 plus the locality pay areas for each regional office and the Washington-Baltimore-Northern Virginia, DC-VA-WV-PA region for the national ETA office staff), Department of Labor grade ranges are as of January 2017. See <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2017/general-schedule/>.

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

There are no program changes from the previously approved SCSEEP data validation. For the **WIOA Joint Quarterly Narrative Performance Report**, this revision reflects the use of a new information collection tool to allow for the necessary collection of information under WIOA. The burden described above reflects the associated hours and costs for the implementation of the new reporting tool. This revised ICR significantly reduces the burden hours for this approval by simplifying the reporting requirements to a narrative report format. 41,420 Total Annual Burden

Hours, from 62,174 under the previous ICR which is a reduction of 20,754 hours. More intensive data validation is now being provided through the WIOA performance reporting system, the Workforce Integrated Performance System (WIPS), eliminating the need for the intensive collection previously required under the Workforce Investment Act. This simplified report only requires the reporting of qualitative information on the programs' efforts, challenges, and outcomes.

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.*

SCSEP publishes the results of data validation in an annual validation report. Additionally, grantees will submit the quarterly narrative reports on a quarterly basis to ETA through the reporting system or via email if no reporting system is provided, 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 quarter, ETA issues the Quarterly Workforce System Results. Data and other information contained in the narrative reports may be included in these reports. The data may also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports, as needed.

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 for OMB approval will be displayed.

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

There are no exceptions to the certification statement.