

**SUPPORTING STATEMENT**  
**Workforce Information Grants to States (WIGS)**  
**OMB Control No. 1205-0417**

**A. Justification.**

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.*

This collection of information is necessary to comply with the reporting requirements of the Workforce Innovation and Opportunity Act (WIOA) Section 308 amended the Wagner-Peyser Act (29 U.S.C. 491-2), which can be found at <https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>; and 20 Code of Federal Regulations (CFR) Parts 651 and 652 (<https://www.doleta.gov/wioa/Docs/wioa-regs-labor-final-rule.pdf>).

WIOA Section 308 requires the Secretary of Labor to oversee the development, maintenance, and continuous improvement of a nationwide Workforce and Labor Market Information System (workforce information) system; and to evaluate the performance of the system and recommend needed improvements, taking into consideration customer consultation results, with particular attention given to improvements needed at the state, regional and local levels. This information collection for the Workforce Information Grants to States (WIGS) ensures the U.S. Department of Labor (DOL) Secretary meets WIOA requirements, and the states complete grant deliverables such as state economic analyses or special workforce information/economic studies, and the annual performance report.

This ICR requests to revise the WIGS Training and Employment Guidance Letter (TEGL) collection to remove the online annual reporting system. The online annual reporting system described in the 2014 ICR submission was never completed. ETA determined the development, maintenance and use of that system was overly burdensome on respondents and the resource cost for development and maintenance was prohibitive. Instead, the information is collected by having respondents (states and regions) copying their work onto a shared directory within the ETA firewall, and ETA publishes the information to the public using this web address [http://doleta.gov/Performance/Results/AnnualReports/annual\\_report.cfm](http://doleta.gov/Performance/Results/AnnualReports/annual_report.cfm).

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.*

The Department of Labor's Employment and Training Administration (ETA) makes use of the information collected from WIGS grantees primarily to serve four customer groups: 1) the public (including job seekers and employers); 2) labor market intermediaries who help individuals find a job or make career decisions (such as employment and school counselors, case managers at American Job Centers, and community-based organizations); 3) policymakers and employment

and economic program planners and operators; and 4) miscellaneous other customers, including researchers, commercial data providers, and the news media.

The policy development and oversight responsibilities of DOL include defining deliverables and accountability measures for the Workforce Information Grants to States. ETA has used information provided in response to this data collection to assess the extent to which the states have met the grant deliverables, whether the Federal investment has achieved planned outcomes, and to identify technical assistance needed by the states. To ensure accountability, ETA regional offices assess and document the effectiveness of grantee performance through the periodic review and observation of states' progress against grant deliverables, annual performance reports, and the degree of participation in partnership and customer service opportunities that enable state leveraging of limited workforce information program resources.

The requirement that states produce economic analyses and special workforce information/economic studies and reports ensures that the workforce and labor market information created through Federal funds supports and substantively contributes to overall state workforce investment system planning and to state and sub-state economic development. The analyses, studies, and reports created through this deliverable are to inform the workforce and economic development policy and investment decisions made by the governor and state and local workforce investment boards.

This ICR has nothing to do with the Workforce Investment System Performance Reporting System (WISPR) and does not include a customer satisfaction survey, which the statute does not require for this collection. Requirements for customer consultation ensure that state products and services meet customer needs, and are continuously improved; however these outreach activities are considered good business practices that would be conducted in any case.

ETA posts links on its web sites to all state annual performance reports and economic analyses and special workforce information and economic studies ([http://doleta.gov/Performance/Results/AnnualReports/annual\\_report.cfm](http://doleta.gov/Performance/Results/AnnualReports/annual_report.cfm)). This makes them readily available to the public and allows states to compare their products and services with other states (thereby promoting learning and competition among the states to deliver products and services that best meet their residents information service needs). ETA also requires that states publish grant products on their own Web sites, to maximize their accessibility to state residents.

- 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 continues to require the use of electronic submission of workforce information grant annual reports, state economic analyses and special workforce information/economic studies, and reports as a means to reduce the state hard-copy reporting burden to the greatest extent practicable. All 54 state and territorial grantees now utilize electronic formats to submit required grant deliverables.

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 information requested is unique to these grants and is not otherwise available.

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

The collection of information only affects state grantees, and does not affect small businesses or other small entities.

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.*

Management of the nationwide workforce information system requires the regular, reasonable collection of information to assure accountability for the investment of funds and that the grants are achieving statement of work outcomes. Further, Section 308 of the Workforce Innovation and Opportunity Act requires that the performance of the employment statistics system be evaluated annually, taking into consideration the results of customer consultations.

Apart from the statutory obligation to collect the information, the benefits to the public and the workforce investment system (i.e., Federally-funded employment and training programs) would be significantly lessened absent the uniform standards and oversight provided by the grant deliverables and requirements. For example, without consistent workforce data definitions, the data provided by each jurisdiction would not be comparable, and therefore would have little credence or value for users.

All information is required on an annual basis.

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:*

ETA has no such requirements nor requires a statistical survey. ETA uses the approved industry and occupational classifications.

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 August 15, 2016 (81 FR 54126). The Department received one comment, from the Wyoming Workforce Services Department. The commenter suggested DOL either provide summaries of all annual reports received from states per this ICR, or remove the requirement for states to provide this information since the funding level for this requirement has not changed since 2005.

After consideration, no change to this requirement will be made. ETA makes the annual reports available upon request to any member of the public.

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

ETA does not provide any payments or gifts to respondents.

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

ETA is neither requesting nor collecting confidential information from respondents.

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.*

There are no questions of a sensitive nature.

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

The total number of respondents is 54 (50 states, plus the District of Columbia and the territories of Guam, Puerto Rico, and the Virgin Islands). Each respondent publishes an annual comprehensive economic report or less comprehensive economic analyses and submits an annual performance narrative report.

For the previous OMB clearance package submittal, the time burden estimates were based on consultation with states regarding preparation of a state economic analysis report, and production of an annual performance narrative report, including the results of the customer satisfaction consultations and assessments. The states, based on resident density, were small to large in size, and included Alabama, Florida, Illinois, North Carolina, South Carolina, Tennessee, and Utah. A simple average was used to determine the representative burden for all of the WIGS grantees. Since no changes have occurred in the state requirements for providing this information, the burden estimates are assumed to not have changed.

*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 (hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Grant preparation	54	1	54	63.22	3,414	32.67	\$111,535
Required economic report or analyses	54	1	54	434.86	23,482	32.67	\$767,157
Annual report to ETA	54	1	54	80.22	4,332	32.67	\$141,526
<b>Unduplicated Totals</b>			<b>162</b>		<b>31,228</b>		<b>\$1,020,218</b>

\* The Hourly Cost per Task has been attained from the Mean Hourly Wage for State Government Economists from the Bureau of Labor Statistics Occupations Employment Survey (OES) for 2015 (<http://www.bls.gov/oes/current/oes193011.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).*

ETA does not expect that states fund any of the required activities with state or other funding. Federal grant funds have been sufficient to fully support the planning and administration of the grant; production of the required grant deliverables (including relevant economic analyses, special workforce information and/or economic studies and customer consultations); and reports on grant activities.

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.*

The Federal government’s costs are divided between the ETA regional and national offices, and between the program and grants units in the national office. Federal staff tasks include 1) review of the annual economic report or other analyses, and 2) review of the annual performance report. These tasks involve review of the grant deliverables, telephone calls/emails, negotiating changes to expected deliverables, consultation with grantee and other Federal staff, and file review and maintenance.

ETA is claiming the estimated \$1,020,218 States are expected to spend to comply with this information collection as a Federal expense. ETA includes administrative funds through the [Annual Workforce Information Grant to States](#), in order to offset the cost of Federal mandates.

ETA Federal hourly staff costs were calculated at \$50.04 per hour for a GS-13, Step 5. (Source: Office of Personnel Management, 2016 General Schedule Locality Pay Table for the Washington, D.C. area, at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/16Tables/html/DCB\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/16Tables/html/DCB_h.aspx))

<b>Federal Burden</b>	<b>Hourly Cost</b>	<b>Total Time Burden (hours)</b>	<b>Total Cost Burden (\$)</b>	<b>Annualized Cost</b>
Review of economic report or analyses	50.04	256	12,814.24	12,814.24
Review of annual report to ETA	50.04	294	14,711.76	14,711.76
<b>Federal Total</b>			<b>27,526</b>	<b>27,526</b>

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

Please note 54 hours have been removed from the previous estimate for the PRA burden. These had been added due solely to ETA’s plans to have the annual reports uploaded onto an annual narrative reporting system database. As described in section 1, the resource cost for the development, maintenance, and use of the online annual reporting system was prohibitive, so these 54 burden hours are no longer necessary.

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.*

Since 2002, ETA has published each state's annual performance report on a secure ETA-supported Web site for public access and review, as requested by the grantees and the workforce development system. Beginning with the 2006 grant deliverables, ETA has also publicly posted all submitted state economic analyses, reports, and workforce information studies, again as requested by the grantees and the workforce development system.

ETA has no plans to tabulate the information collected, and therefore no complex analytical techniques are involved.

ETA generally seeks to publish the WIGS guidance and instructions in the Spring, as soon as possible after ETA calculates the state monetary allotments, in order to give states the maximum opportunity to plan for the program year to which the guidance applies: the program year (PY) spans July 1 through the following June 30. ETA's grant office selects the grant application due date each year, selecting a date at least one month after publication of the guidance; however, ETA Regional Administrators have the discretion to extend submission due dates upon state request, if warranted.

All information collection occurs within the scope of the grant performance period. Deliverables are generally due within the applicable PY, although the annual performance report is due by September 30 of each year — 90 days following the end of the PY, per 29 CFR 97.40 (b)(1).

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 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 to the certification statement.

## **B. Collections of Information Employing Statistical Methods**

This information collection does not employ statistical methods.