

**SUPPORTING STATEMENT**  
**QUARTERLY NARRATIVE PROGRESS REPORT, EMPLOYMENT AND TRAINING**  
**SUPPLEMENTAL BUDGET REQUEST ACTIVITIES**  
**OMB Control No. 1205-0517**

The Employment and Training Administration (ETA) is revising the ETA 9178 information collection. This update extends the use of the ETA 9178 to monitor the progress of State Workforce Agencies (SWAs) in implementing supplemental grant projects funded through Unemployment Insurance (UI) Supplemental Budget Request (SBR) grants and Reemployment Services and Eligibility Assessments (RESEA) grants. The update also revises the ETA 9178 information collection to include Dislocated Worker Grants (DWGs) to states for demonstration and special projects such as Reemployment and Systems Integration (RSI).

**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.*

The ETA National and regional offices use the ETA 9178 to monitor the progress of SWAs in implementing supplemental grant projects. ETA provides supplemental grants for SWAs to improve program integrity and performance; support states' information technology (IT) system modernization efforts; enhance reemployment activities such as conducting reemployment and eligibility assessments; and activities related to preventing worker misclassification. ETA implements these projects through UISBR grants and RESEA grants. The update also revises the ETA 9178 information collection to include Dislocated Worker Grants (DWGs) to states for demonstration and special projects such as Reemployment and Systems Integration (RSI). This information collection includes the funded project/activity, the targeted start and completion dates for the project/activity, and the quarterly implementation status. These data are needed for budget preparation and control; program planning and evaluation; program monitoring, oversight, and performance accountability; actuarial and program research; and for accounting to Congress and the public. This collection is authorized under the Social Security Act, Title III, Section 303(a)(6).

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 information to be collected on the ETA 9178 report will be used by the National and regional offices to monitor the progress of State Workforce Agencies (SWAs) in successfully implementing projects funded through supplemental grant projects. This information will include the grant project title and purpose, the project timeline and milestones, a narrative description of the project implementation status. It will also

include explanations of any delays in implementation, proposals for addressing any problems that caused the delay and new project timelines if applicable, a self-reported designation of the implementation status (i.e. complete /ahead of schedule/on schedule/behind schedule), and a discussion of identified technical assistance needs for the successful completion of the project.

In recent years, ETA provided supplemental grant projects to states with incentives to accelerate state actions to prevent and reduce improper payments, improve program performance, support states' IT system modernization efforts, and funded other priority initiatives to enhance reemployment activities and prevent worker misclassification. ETA also provided grants to states to integrate UI, Wagner-Peyser employment services (ES), and Workforce Innovation and Opportunity Act (WIOA) Dislocated Worker (DW) systems and services to provide a seamless experience for dislocated workers and to assist dislocated workers in accessing services.

The information to be collected in this report is frequently requested by the public and ETA makes the status of these projects such as those related to program integrity projects available on a quarterly basis via a Web site, <http://www.dol.gov/dol/maps/map-ipia.htm>. This information is currently reported by the states to the regional offices on an ad hoc basis and in no standardized format. This data collection is expected to provide consistency in reporting by states regarding the implementation status of these projects and for ETA to use this information to effectively track the progress made by the states and assess the impact of these implementations on program operations and performance.

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.*

States will use a simple form provided by ETA to email this report to the regional office.

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.*

This data is not available from other sources in the detail needed by the ETA National and regional offices to assess states' progress in implementing individual supplemental grant projects.

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

This information collection is directed to states. There is no impact on 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.*

The ETA 9178 is a basic report on the progress of supplemental grant projects funded by ETA. It contains simple data elements and narrative to determine state implementation status. Without this information, ETA is unable to effectively and consistently monitor states' use of the funds and state progress in implementing the projects for which the funds were provided.

In recent years, ETA provided supplemental grant projects to states with incentives to accelerate state actions to prevent and reduce improper payments, improve program performance, support states' IT system modernization efforts, funded other priority initiatives to enhance reemployment activities and prevent worker misclassification, and provided grants to states to integrate UI, ES, and DW systems and services to provide a seamless experience for dislocated workers and to assist dislocated workers in accessing services. ETA expects the timely implementation of these projects to impact the overall performance of the UI program. Providing the implementation status information on an annual basis rather than quarterly as proposed does not allow adequate time for ETA to offer technical assistance on projects if necessary to achieve implementation deadlines.

Furthermore, unlike burden on businesses or individuals, states are funded to collect and report data through their annual UI administrative grant.

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.*

The collection 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 given 60 days to review and comment by way of a *Federal Register* notice published on June 8, 2017 (82 FR 26714). The Department received one comment that was not germane to this information collection request. No other public comments were received.

When developing the ETA 9178, ETA consulted its regional office staff to assess the monitoring burden as well as the impact on states. ETA also worked with one state to assess the collection burden and used the results of that outreach to establish the 5 hour per response estimate. ETA continues to engage its regional office staff on the quarterly collection of ETA 9178 responses to support grant monitoring in GEMS. This engagement includes the assessment of any changes in the burden hour estimate assigned to this data collection.

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

There are no payments made to respondents.

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

The ETA 9178 reports contain no personal or private 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.*

There are no questions of a sensitive nature.

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

States will be notified in the grant funding announcement that they are required to provide a quarterly narrative report using the form ETA 9178. States with active supplemental grant projects will provide this report on a quarterly basis. Based on consultations with SWA personnel, it is estimated that it will take state agencies a total of 1,140 hours to provide this information through the planned reporting format. ETA anticipates that states will require 5 hours per response for the manual entry of

information into the ETA 9178. The grant award letter to the state identifies the supplemental projects that are funded through UI SBR, RESEA, and RSI-DWG grants. For UI SBRs provided to state consortia for IT modernization projects, the lead state is expected to provide the status report on behalf of the partner states.

States will provide a unique form ETA 9178 for each project awarded under the grant funding announcement. Based on an analysis of ETA grant awards as of May 2017, states are currently implementing an average of 12.8 projects covered by the ETA 9178. These forms are packaged by the states and submitted to ETA as one report for the grant award. States will continue to submit updates for these reports in each quarter until the project is completed.

The specific detail is broken out below:

57 estimated respondents x four quarterly reports/year x 5.00 hour = 1,140 burden hours

Total burden per state: 1,140 burden hours / 57 SWAs = 20 hours

Three year average for this submission: 1,140 x 3 = 3,420 hours / 3 years = 1,140 hours

Based on budget allocations, a figure of \$49.00 was derived for the average hourly wage of state agency staff for fiscal year 2017. Using \$49.00, the three year average cost for all respondents having to do this collection is computed as follows:

1,140 burden hours x \$49.00 per hour = \$55,860

Three year average cost for this submission: \$55,860 x 3 = \$167,580 divided by 3 years = \$55,860 in annual costs.

ETA notes that, like all other reporting for UI, funds are allocated to states for the administration of the UI program; therefore, this information collection would not impose an unfunded mandate.

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

*Estimated Annualized Burden Hour and Cost*

Form	Number	Number of	Total	Time Per	Total	Avg.	Total
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	<b>of Respondents</b>	<b>Responses per Respondent</b>	<b>Annual Responses</b>	<b>Response (Hours)</b>	<b>Burden Hours</b>	<b>Hourly Rate*</b>	<b>Burden Costs</b>
ETA 9178	57	4	228	5	1,140	\$49.00	\$55,860
<b>Unduplicated Totals</b>			<b>228</b>		<b>1,140</b>		<b>\$55,860</b>

\*Source: The hourly rate is computed by dividing the FY 2017 national average PS/PB annual salary for state staff as provided for through the distribution of state UI administrative grants ([https://wdr.doleta.gov/directives/attach/UIPL/UIPL\\_20-16.pdf](https://wdr.doleta.gov/directives/attach/UIPL/UIPL_20-16.pdf)) by the average number of hours worked in a year (1,682.10). For FY2017, this calculation is: \$81,777 / 1,682.10 = \$49.00.

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).*

This information collection entails no additional burdens beyond the value of a respondent's time.

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.*

States will email this report quarterly to the regional office; staff will upload it into ETA's existing grants management system along with many other reports. Annual Federal costs represent the time it takes regional staff to receive, analyze, and report and store the data. These costs are summarized as follows:

Regional office time: 2 hours per state x 9 states per region (avg.) = 18 hours per quarter  
 18 hours per quarter x 4 quarters x 6 regions = 432 hours annually  
 National office time: 1 hour per state x 9 states per region (avg.) = 9 hours per quarter  
 9 hours per quarter x 4 quarters x 6 regions = 216 hours annually  
 432 regional hours + 216 national hours = 648 total hours annually

Total annual cost:

Regional office: \$39.19 per hour x 432 hours = \$16,930.08. (Wage rate: [Office of Personnel Management Salary Table 2015-RUS: GS-12, Step 5 hourly rate](#)).

National office: \$43.29 per hour x 216 hours = \$9,350.64. (Wage rate: [Office of Personnel Management Salary Table 2015-DCB: GS-12, Step 5 hourly rate](#)).

Grand Total: \$26,280.72 (\$16,930.08 + \$9,350.64).

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

The ETA 9178 was originally developed in the context of reporting for a broad range of UI supplemental funding activities that include providing reemployment services under the RESEA program and making improvements to IT systems to promote security, integrity, and/or connection to dislocated worker services and systems. RSI-DWGs are included in this revision as they provide grants to states for similar activities such as system integration and services to dislocated workers. Given these similarities in activities, ETA believes the quarterly status reporting requirements of RSI-DWGs and UI supplemental grants are fundamentally the same. Moreover, activities funded under RSI-DWGs could have been supported in a similar manner under UI SBR authority, if funding was available. Therefore, in addition to including RSI-DWGs as being covered by the ETA 9178, ETA also updated the title of the collection to “Quarterly Narrative Progress Report, Employment and Training Supplemental Budget Request Activities.”

Changes to the calculations are reflected and explained below:

Original burden total estimates:	212 Estimated Total Annual Responses 1,237 Estimated Total Burden Hours
Actual burden totals:	228 Total Annual Responses (+16 responses) 1,140 Total Annual Burden Hours (-97 hours)

The change to the total annual responses is based on the inclusion of 4 additional SWAs that do not operate UI programs, bringing the total potential respondents under this ICR to 57 and resulting in an increase of 16 additional annual responses.

In addition, the total burden hours per response were updated to reflect the actual burden totals shown in the year two and three totals per response (5 hours) from the previous collection. States were initially given more time to complete reports in the first two quarters of ETA 9178 implementation (10 hours) due to the workload involved in creating a large number of reports versus updating reports in subsequent quarters and adding only a handful through new awards. In subsequent quarters, the total hours per response decreased (to 5 hours per response) as the workload associated with creating a large number of initial reports was eliminated, resulting in a decrease of 97 annual burden hours.

Additional changes to hourly rates were made to reflect the latest data available.

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.*

Results such as those related to states' status on UI program integrity projects will be published on a Web site operated and maintained by ETA (<http://www.dol.gov/dol/maps/map-ipia.htm>). This site provides the status of each state's progress in implementing the integrity strategies identified in ETA's strategic plan, noting if a plan is in place to implement the strategy and rating the strategy implementation as complete, on track, or not on track.

The data collection will be used internally by ETA to track the implementation progress made by the states on these projects, to assess the impact of these implementations on program operations and performance, and to develop effective technical assistance to aid state implementation of the projects.

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 OMB control number and expiration date will be displayed on the ETA-9178. A menu option has been incorporated into the UI electronic reporting system which provides access to a complete listing of OMB control numbers and expiration dates for all required reports.

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.