

## **JUSTIFICATION FOR NON-SUBSTANTIVE CHANGE TO AN ALREADY APPROVED INFORMATION COLLECTION**

**OMB Control Number: 1205-0522**

**Title: Required Elements for Submission of the Unified or Combined State Plan and Plan Modifications under the Workforce Innovation and Opportunity Act**

In February 2016, OMB approved the Information Collection Request (ICR), OMB control number 1205-0522, that allows the Department of Labor and Department of Education (the Departments) to collect State Plans required by the Workforce Innovation and Opportunity Act (WIOA). The Department of Labor is the primary owner of the collection, for purposes of OMB processing. In April 2016, the Departments collected, reviewed, and approved WIOA State Plans for the first time under the new law, using the requirements in the approved ICR. As a result, the Departments noted a few areas in the ICR where the language could have been clearer to yield the information we requested.

The Department of Labor is requesting a non-substantive change as we are not making any substantive or material changes and the changes to the ICR do not increase the previously calculated burden estimates. The changes being made are wording clarifications of existing requirements. Most notably, the Department seeks to further clarify what information is required to be provided to the Department under section VI.(d) of the State Plan ICR which already requires certain states (those states that are single-area states) to “submit any information required in the local plan.” The requirements for what must be included in the Local Plan are found in section 108 of WIOA and 679.560 of the regulation. These provisions list all of the information that is required to be submitted in the Local Plan and require submission of more information than is listed in section VI.(d) of the ICR. The Department is seeking to provide further clarification/emphases about what it means to “submit any information required in the local plan.” This is not increasing the respondent’s burden because submitting all of the information listed in section 108 of WIOA and in section 679.560 of the regulation was accounted for in the original burden estimate for the State Plan ICR, and the Department is not changing a question or seeking new information.

In the portion of the ICR reserved for Adult Education and Family Literacy Act requirements, States will now be required to submit information to address section 427 of the General Education Provisions Act, however this requirement exists under a separately approved ICR (OMB no. 1894-0005), with burden already accounted. Additionally, an assurance is being added regarding the statutory requirement in section 502 concerning the Buy America Act. We estimate in total that these changes described above will not add burden to the overall collection.