SUPPORTING STATEMENT

A. JUSTIFICATION

This is a justification for the Department of Labor (DOL) request to reinstate a previously approved information collection (OMB Control No 1291-0002) to meet the reporting and recordkeeping requirements of the **Youth CareerConnect (YCC) Grants [SGA/DFA PY-13-01].** This reporting structure features standardized individual data collection on program participants in both quarterly performance and narrative formats. All data collection and reporting is done by grantee organizations (school district, workforce investment board, state or local government, not-for-profit, or faith-based and community organizations) or their sub-grantees.

DOL requests data collection from YCC grantees for the purpose of tracking grant progress and oversight of program performance reporting. This ICR requests an extension of the approval to maintain a Participant Tracking System (PTS) that collects individual participant data, stored securely, and is used for both performance reporting and evaluation purposes. DOL has requested that performance reports are submitted to DOL no later than 45 days after each calendar quarter. Grantee quarterly reporting continues to consist of two parts:

1. **Quarterly Performance Data Reports.** These reports are collected from grantees using an online PTS data file upload system that will validate participant records and produce a Quarterly Performance Report form. This approach addresses the Agency's goal of minimizing grantee burden and reporting errors. Data validation is required quarterly to assess the accuracy of data collected and reported to DOL on program activities and outcomes. Performance data consists of participant demographics characteristics, types of services received, placements, outcomes and follow up status. Each requested data element can be reviewed in detail in the supporting document: *YCC Data Elements.* These data elements have not changed from the elements approved through OMB Control No 1291-0002.

2. **Quarterly Narrative Reports:** In conjunction with performance data, DOL is requesting the continued collection of quarterly narrative reports that provide a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter. The accuracy, reliability, and comparability of program reports submitted by grantees using Federal funds are fundamental elements of good public administration and are necessary tools for maintaining and demonstrating system integrity. The use of a standard set of data elements, definitions, and specifications at all levels of the workforce system helps improve the quality of performance information that is received by DOL.

A.1. Circumstances Necessitating Data Collection

The **Youth CareerConnect (YCC) Grants** are authorized under Section 414(c) of the American Competitiveness and Workforce Improvement Act of 1998 (ACWIA), as amended (29 U.S.C. 3224a) and are designed to support applicants in providing education, training, and job placement assistance in occupations and/or industries that have high-growth potential for which employers are using H-1B visas to hire foreign workers, and the related activities necessary to support such education, training, and placement activities. At the time of award, these grant funds were allowed to be used to serve high school youth. YCC grant reporting requirements are governed by ACWIA, which directs the Secretary to require grantees to report on the employment outcomes obtained by workers receiving training under this subsection using indicators of performance that are consistent with other indicators used for employment and training programs administered by the Secretary. Evaluation and research work are authorized under Workforce Innovation and Opportunity Act section 169 (See 9 U.S.C. 3224).

Five long-term outcome measures will be used to measure the overall success of the YCC grants, and nine short-term measures will act as leading indicators that serve as predictors of success:

Long-term measures:
- Final Program Retention Rate – the percentage of participants who complete the program, of those who enter the program;
- High School Diploma Attainment Rate – the percentage of participants who attain a high-school diploma;
- Credential Attainment Rate – the percentage of participants who attain an industry-recognized credential in the specified H-1B industry or occupation;
- Diploma and Credential Attainment Rate – the percentage of participants who attain a high-school diploma and credential in the specified H-1B industry or occupation; and
- Placement Rate – the percentage of participants who are placed in one of the following: unsubsidized employment, post-secondary education, occupational skills training, or Registered Apprenticeship (the performance report also will include separate counts of the number of participants who enter unsubsidized employment, enter post-secondary education, enter occupational skills training, and enter a Registered Apprenticeship).

Short-term measures:
- Enrollment Rate – the number of participants enrolled in the program compared to the target number of participants identified in the grant application;
- Attendance Rate – the rate of school attendance by participants in the program;
- Chronic Absence Rate – the percentage of participants who have missed 10 percent of school days for any reason-excused or unexcused -- as well as suspensions;
- Mentoring Rate – percentage of participants who have matched mentors and participate in formal mentoring;
- Yearly Program Retention Rate – percentage of participants who continue in program from one school year to the next;
- Work Readiness Indicator – the percentage of participants who are deemed work ready based on an employer assessment conducted at the end of each internship/work experience (using the DOL-developed work readiness tool found at: http://wdr.doleta.gov/directives/attach/TEGL/TEGL07-10a4.pdf);
- Internship Placement and Completion Rates – the percentage of program participants who begin an internship and, of those who begin an internship, the percentage who complete;
- Post-Secondary Credit Attainment Rate – the percentage of participants who attain post-secondary education credit from courses taken during the program; and
- Average Post-Secondary Credit Hours Attained – the average number of post-secondary credits attained per participant while in the program.

In applying for the YCC grants, grantees and their sub-grantees agreed to submit participant-level data and aggregate reports on participant characteristics, services provided, and outcomes to DOL on a quarterly basis. Grantees collect and report quarterly YCC performance data using the Participant Tracking System (PTS) developed by the contractor, Mathematica Policy Research.

Both Quarterly Performance Data Reports and Quarterly Narrative Reports are used for tracking the YCC grantees to ensure they are meeting their targets and to provide them with technical assistance as needed.

A.2. How, by Whom, and For What Purpose the Information Is to Be Used

Grantees are required to track participant-level data on all individuals who receive grant-funded services through YCC programs. These data are used by DOL to assess performance and delivery of YCC program services. Within DOL, the data is used by the Employment and Training Administration and the Chief Evaluation Office within the Office of the Assistant Secretary for Policy. All data required for collection to inform these reports can be viewed in the supporting document: *YCC Data Elements*. Additional documents to support grantee reporting efforts include *Youth CareerConnect Participant Tracking System: Manual for Participant Enrollment, Service Receipt and Outcomes Tracking, and Grantee-Level Data Entry* and *Youth CareerConnect Aggregation Rules for Calculating the Quarterly Performance Report.*

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. In addition, information obtained through the PTS information collection will be used at the national level during budget and allocation hearings for DOL compliance with the Government Performance and Results Act (GPRA) and other legislative requirements, and during legislative authorization proceedings.

A.3. Use of Technology to Reduce Burden

To comply with the Government Paperwork Elimination Act, DOL has streamlined the collection of participant data and the preparation of quarterly reports to the extent feasible by providing a Web-based PTS and by providing uniform data elements and data definitions to grantees across DOL programs. All YCC data and reports are submitted to DOL via an electronic reporting system. Grantees collect, retain, and report all information electronically through this system.

A.4. Efforts to Identify Duplication

The data items identified in supporting document: *YCC QPR form* are used to generate Quarterly Performance Reports. This form has not changed from the form approved through OMB Control No 1291-0002.DOL minimized the reporting burden by establishing the number of data elements required commensurate with the level of resources expended and services received. Data items collected by program reports and individual records are needed to: (1) account for the detailed services provided by multiple agencies to help participants prepare for job/education placement; and (2) better identify overlapping and unproductive duplication of services. Information provided through the YCC PTS is not available through other data collection and report systems available to the Department.

A.5. Methods to Minimize Burden on Small Businesses

For reporting 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.

A.6. Consequences of Less-Frequent Data Collection

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. If DOL does not comply

with these requirements, funding for demonstration programs would be compromised. In applying for YCC grants, grantees agreed to meet DOL's reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY-13-01), which requires the submission of quarterly reports within 45 days after the end of the quarter.

A.7. Special Circumstances for Data Collection

None of the data collection efforts involve any special circumstances.

A.8 Preclearance Notices and Responses

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to review the information collection request. A 60 day notice was published in the Federal Register on March 6, 2018[1].

We received one non-responsive comment to the notice which is included in the supporting documents. The comment objects to the training program and does not address the information collections being approved under this action.

A.9 Payments to Respondents

There are no payments to respondents other than the funds provided under the grant agreement.

A.10. Privacy Assurances

Data is being collected in accordance with all relevant regulations and requirements; and the Freedom of Information Act (5 CFR 552) and related regulations. Participant data is shared with DOL either through informed consent provided by the parent/guardian of the participant or the establishment of a Memorandum of Understanding (MOU) with DOL using the Family Educational Rights and Privacy Act of 1974 (FERPA) School Officials Exemption.

All information on individual participants is entered into the PTS. All sensitive data is encrypted and protected by Secure Socket Layer (SSL). Logging or output files does not contain sensitive data and will be limited to generic system and error data. Furthermore, data extracts for use by the evaluators will be available in files encrypted and available to team members on Relyon's File Transfer Protocol over SSL (FTPS) site.

The system segregates user data into sensitive data, user-identifiable data, and project-specific data. Sensitive data is stored in a separate database table containing a system-generated ID number in encrypted form. Sensitive data is entered into the system but at no point is it displayed or downloadable by users of the system. User-identifiable data, including names and birth dates, is stored separately from project-specific data and is available for updating only by staff designated by the grantee or the contractor.. Performance reports generated in the PTS are aggregated and do not provide any information on specific individuals.

The PTS is accessible only to staff who are currently working on the project. Staff access to participant-level data is restricted. To access the PTS, users first log on to their workstations and then to the PTS using a separate log-in prompt. The database is encrypted at rest and will be removed and securely

[1][1] See: Federal Register Vol. 83, No. 44, p. 9547 published on Tuesday, March 6, 2018.

archived at the end of the data collection period. Upon completion of all the work under YCC Grant Program, data collected in PTS will be completely purged from all data storage components.

A.11. Additional Justification for Sensitive Questions

While sensitive questions are asked of participants in the data collection, the privacy of participants is protected as discussed in Section A.10. In addition, security has been built into the data collection system by the PTS contractor. As mentioned in Section A.10. DOL has strict protocol on protecting all Personally Identifiable Information (PII) and the PTS contractor has provided a data collection system that has the capacity to encrypt any PII submitted via the PTS. The PTS collects information on characteristics of participants, such as sex, race/ethnicity, education level, and work-related barriers. This type of information is generally collected as part of enrollment in government-funded training programs including the YCC program and is therefore not considered sensitive.

A.12. Estimates of the Burden of Data Collection

YCC respondent data collection burden reflects the information collected solely to comply with Federal reporting and evaluation requirements. All estimates assume a three-year clearance.

Participant Data Collection Burden
DOL assumes each participant will require approximately 160 minutes for data collection. This figure is split between the data entry staff person (140 minutes) and the participant orally providing data (20 minutes). YCC is expected to serve an additional 9,900 participants throughout the remainder of the grant's lifetime. Over the three year clearance requested, that totals 3,300 participants served each year. Data collection burden hours are based on the experiences of the YCC grantees thus far.

Quarterly Performance and Narrative Progress Report Burden
The YCC quarterly performance report burden assumes that all grantees will continue to use the PTS provided by the performance and evaluation contractor to generate quarterly performance reports. The burden includes reviewing and correcting errors identified by the PTS for each participant record within the data file, generating, reviewing, and approving the aggregate QPR form. DOL assumes each grantee will spend approximately 4 hours per quarter preparing this report.

The YCC 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. DOL assumes each grantee will spend approximately 10 hours per quarter preparing this report.

Table 1. Estimated annualized respondent hour and cost burden

Type of instrument	Annual Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Average Burden time per Response (in Hours)	Annual Estimated Burden Hours	Average Hourly Wage[a]	Annual Monetized Burden Hours
Participant Data Collection	3,300	1	3,300	160/60	8,800	$7.25	$63,800
Quarterly Narrative Progress	8	4	32	10	320	$16.41	$5,251

Reports							
Quarterly Performance Reports	8	4	32	4	128	$16.41	$2,100
Total	**3,316**				**9,226**		**$71,151**

[a] The hourly wage of $7.25 is the federal minimum wage (effective July 24, 2009): http://www.dol.gov/dol/topic/wages/minimumwage.htm. The hourly wage $16.41 is the average hourly earnings in the Bureau of Labor Statistic's Social & Human Assistance Industry category (https://www.bls.gov/oes/current/oes211093.htm#nat).

A.13. Estimated Cost to Respondents

There are no direct costs to respondents other than that of their time of participation.

A.14. Estimates of Annualized Costs to Federal Government

The total annualized cost to the federal government is $39,538. Costs result from the following two categories:

(1) Annual Costs: The annual costs borne by DOL for the contractor to maintain the system and provide training and technical assistance is estimated to be $23,863.

(2) **Federal Staff Cost:** The annual cost borne by DOL for federal technical staff to oversee the contract is estimated to be $15,675. We expect the annual level of effort to perform these duties will require 208 hours for one federal GS 14 step 4 employee based in Washington, D.C., earning $47.10 per hour. (See Office of Personnel Management 2018 Salary Table at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS.pdf). To account for fringe benefits and other overhead costs the agency has applied multiplication factor of 1.6:

208 hours × $47.10 × 1.6 = $15,675.

Thus the total annualized federal cost is $23,863 + $15,675 = $39,538

A.15. Changes in Burden

The burden estimates were updated based on the most recent information on how long the instruments take to complete. Additionally, there is a reduction in respondents as most intake is complete.

A.16. Tabulation of Publication Plans and Time Schedules for the Project

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

Each quarter, DOL issues the Quarterly Workforce System Results. Data contained in the YCC PTS may be included in these reports. The data will also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports, as needed.

A.17. Approval Not to Display OMB Expiration Date

The expiration date for the OMB approval will be displayed.

A.18. Exceptions to OMB Form 83-I

No exceptions are requested in the "Certification of Paperwork Reduction Act Submissions."

B.   COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not contain statistical methods.