SUPPORTING STATEMENT
YouthBuild Reporting System
OMB Control Number 1205-0464

A.   Justification.

The Department of Labor (DOL), Employment and Training Administration (ETA) requests the Office of Management and Budget's approval of this revision to the reporting and recordkeeping requirements of the YouthBuild program.

This standardized data collection for program participants is completed by YouthBuild grantees through the use of a web-based case management system. The Work Site Description Form, ETA-9143, is completed as part of each grant application and then on an as-needed basis by YouthBuild grantees to provide information to ETA on the proposed work sites for training participants in construction skills. The Annual Housing Census, ETA-9143, is completed once annually by YouthBuild grantees to provide information to ETA on the number of affordable housing units built or renovated by YouthBuild participants.

YouthBuild grantees provide quarterly performance data, including aggregate and participant-level information on demographic characteristics, types of services received, placements, outcomes, and follow-up status through a web-based case management quarterly performance report submission (ETA-9136 and ETA-9173). This report collects data on individuals who receive education, occupational skills training, leadership development services, and other services essential to preparing at-risk youth in in-demand occupations through YouthBuild programs. The list of collected data elements is contained in ETA-9138. Based on a comment received during the 60-day comment period, ETA is proposing the inclusion of some new data elements for collection to support reporting of WIOA data. The revised ETA-9138 in this revision request includes the additional data elements, which are used to generate the ETA-9136 and ETA-9173 reports through the YouthBuild case management systems.

The Work Site Description Form (ETA-9143) collects information on the work sites proposed by prospective and current YouthBuild applicants that will be used for training activities required under the solicitation. Included with the Work Site Description Form is the Housing Census, which is submitted by grantees on an annual basis to capture information on the number of units of affordable housing built annually by YouthBuild participants. There are changes proposed for the Work Site Description Form under ETA-9143 that do not impact burden collection in this information collection request package, as they are limited to consolidation of multiple spreadsheet tabs into one PDF file that has been reordered and edited for clarity.

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 ETA.

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 YouthBuild program is 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. YouthBuild is designed to: enable disadvantaged youth to obtain the education and employment skills necessary to achieve economic self-sufficiency in occupations in post-secondary education and high-demand training opportunities; provide disadvantaged youth with opportunities for meaningful work and service to communities; foster the development of employment and leadership skills and commitment to community development among youth in low-income communities; and expand the supply of permanent affordable housing for homeless individuals and low-income families by utilizing the energies and talents of disadvantaged youth.

YouthBuild assists youth who are often significantly behind in basic skills in obtaining a high school diploma or state-recognized equivalency. In YouthBuild, unemployed and undereducated young people ages 16-24 work toward their high school diploma or state-recognized equivalency degree while learning job skills by building affordable housing for homeless and low-income people. The primary target populations for YouthBuild are low-income youth, adjudicated youth, youth aging out of foster care, out-of-school youth, and other at-risk populations. The reporting and recordkeeping system incorporates each of these aspects necessary for program evaluation.

WIOA identifies six performance indicators for all Title I programs: placement into unsubsidized employment in the second quarter after exit (and for youth, also into post-secondary education or training); placement into unsubsidized employment in the fourth quarter after exit (and for youth, also into post-secondary education or training); Median Earnings in the second quarter after exit; Credential Attainment; Measurable Skill Gains; and Effectiveness in Serving Employers. ETA provides web-based case management applications for the collection and reporting of these indicators, which report into the ETA-9136 YouthBuild Quarterly Performance Report that is authorized under this OMB approval, and for which we are requesting approval extension, as well as the ETA-9173 WIOA Quarterly Performance Report separately approved under OMB number 1205-0521. Earlier grants that are still completing WIA performance reporting must use the ETA-9136 form to submit WIA performance data while those grantees which are reporting WIOA performance indicators are phasing into using the ETA-9173 form.

Pub.L. No. 113-128, Sec 185(d) (The Workforce Innovation and Opportunity Act) broadly addresses reports, recordkeeping, and investigations across programs authorized under Title I of the Act. The provisions of section 185:

- Require the Secretary to ensure that all elements of the information required for reports be defined and reported uniformly [section 185(d)(2)];
- Direct each state, local board, and recipient (other than a sub-recipient, sub-grantee, or contractor of a recipient) to prescribe and maintain comparable management information

systems, in accordance with the guidelines that shall be prescribed by the Secretary designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188 [section 185(c)(2)];

- Require that recipients of funds under Title I shall maintain such records and submit such reports in such form and containing such information as the Secretary may require regarding the performance of programs and activities carried out under Title I [section 185(a)(2)];
- Require that recipients of funds under Title I shall maintain standardized records for all individual participants and provide to the Secretary a sufficient number of such records to provide for an adequate analysis of the records [section 185(a)(3)];
- Specify that the reports shall include information about programs and activities carried out under Title I pertaining to:
    - relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants;
    - programs and activities in which participants are enrolled, and the length of time that participants are engaged in such programs and activities;
    - outcomes of the programs and activities for participants, including the occupations of participants and placement for participants in nontraditional employment;
    - specified costs of the programs and activities; and
    - information necessary to prepare reports to comply with section 188 and 29 CFR Part 37.37 [(a-b),(d-e)]; and,
- Require that all elements of the information required for the reports described in section 185(d)(1)(A-E) above are defined and uniformly reported.

Pub.L. No. 113-128, Sec 189(d) (The Workforce Innovation and Opportunity Act) requires the Secretary to prepare and submit to Congress an annual report regarding the programs and activities carried out under Title I. The report must include:

- A summary of the achievements, failures and problems of the programs and activities in meeting the objectives of Title I;
- A summary of major findings from research, evaluations, pilot projects, and experiments conducted under Title I in the fiscal year prior to the submission of the report;
- Recommendations for modifications in the programs and activities based on analysis of such findings; and
- Such other recommendations for legislative or administrative action as the Secretary determines to be appropriate.

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.*

Grantees implement recordkeeping and reporting requirements with grant funds. As a government-procured CMS is provided to all grantees, their implementation costs are minimal. Grant funds are also used with the prior approval of the grant officer to upgrade computer hardware and Internet access to enable projects to use the CMS.

Grantees enter data into the CMS on individuals who receive services through YouthBuild programs. These data will be used by the Department and ETA to evaluate performance and delivery of YouthBuild program services. The CMS allows grantees to collect additional participant data beyond those elements required by YouthBuild. ETA uses the data to track total participants, characteristics, services, and performance indicator outcomes for YouthBuild participants. The CMS supports ETA's ability to assess the effectiveness of the YouthBuild program within the broader youth public workforce system.

Within ETA, the data are used by the Offices of Workforce Investment, Financial and Administrative Management, Policy Development and Research, and Field Operations (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 are made available to the public through publication and other appropriate methods and to the appropriate congressional committees through copies of such reports. In addition, data obtained through the CMS 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 reauthorization proceedings.

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.*

To comply with the Government Paperwork Elimination Act, a web-based Case Management System is provided to the grantees, and data elements and data definitions are uniform across ETA programs. All YouthBuild data and reports are submitted to ETA via the Internet. Grantees collect, retain, and report all information electronically through the ETA-provided CMS.

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.*

ETA has minimized the reporting burden of ETA-9136 and ETA-9173 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 educational, occupational skill training, post-secondary planning and placement, and leadership services and activities provided by YouthBuild program grantees to help at-risk youth participants get and keep well-paying jobs; (2) better identify overlapping and unproductive duplication of services; and (3) reduce the effect of stove-piped data and generate performance information across employment and training programs. Information provided through the YouthBuild management information and reporting system is not available through other data collection and report systems.

ETA-9143 is the result of a unique component of the YouthBuild program model which statutorily requires that programs engage in construction training on low-income work sites that provide sufficient hands-on experience to ensure youth participants have the skills to then succeed in subsequent construction career pathways. ETA-9143 documents these low-income work sites to ensure compliance with Uniform Guidance on allowable costs on construction projects and the statutory requirements for construction training, while also allowing ETA to gather information on the impact of the program in increasing the supply of affordable housing.

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

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 subgrantees 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.*

2 CFR 200.328(b)(1) which governs monitoring and reporting program performance under grants and agreements with non-Federal entities, states that the non-Federal entity must submit performance reports at the interval required by the Federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. In applying for YouthBuild grants, grantees agree to meet ETA's reporting requirements as indicated in the annual Funding Opportunity Announcement (FOA) which requires the submission of quarterly reports within 45 days after the end of the quarter. As well, the FOA requires that grantees demonstrate past performance and this is accomplished for previous DOL-funded YouthBuild grantees through a review of the performance data submitted in the CMS. If ETA did not comply with these requirements, funding for discretionary grant programs would be compromised.

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 January 26, 2018 (83 FR 3773).

ETA received one non-substantive comment and one substantive comment requesting the addition of the following data elements: incarcerated parents, mental health diagnosis, substance use, and various housing options (e.g., couch surfing), as well as the option to designate a participant in follow-up as incarcerated rather than unsuccessfully exited.

This request for revision adds several additional data elements to ensure compliance with required WIOA reporting as ETA transitions from WIA common measures to the WIOA performance indicators. This commenter's request is resolved through the inclusion of additional optional case management data elements that support grantee data management needs to support WIOA reporting and proactive grant management.

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

There are no payments to respondents other than the grant funds described in the annual Funding Opportunity Announcement.

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

ETA is responsible for protecting the confidentiality of the YouthBuild 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. The Department ensures the highest level of security whenever personally identifiable information is stored or transmitted. All contractors that have access to individually identifying information are required to provide assurances that they will respect and protect the confidentiality of the data. ETA's Office of Information Services and Technology has been an active participant in the development and approval of data security measures – especially as they apply to the web-based CMS.

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.*

While sensitive questions are asked of participants in the proposed data collection, the confidentiality of participants is protected as discussed in section A.10. In addition, security is built into the data collection system by the MIS contractor. Participant responses to these sensitive questions allow ETA to comprehensively evaluate the effectiveness of the YouthBuild program.

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

The annual national burden for the YouthBuild reporting system has three components: (1) the participant data collection burden; (2) the quarterly performance report burden; and (3) the work site description and annual housing census burden. This response provides a separate burden for each of the three components.

(1). Participant Data Collection Burden, ETA-9138

The YouthBuild **participant data collection burden** considers the amount of participant and performance-related information collected and reported on the participant record that would not have to be collected by the grantees as part of their customary and usual burden to run the program. Thus the burden reflects the information collected solely to comply with the federal reporting requirements.

The data collection burden will vary by participant based on the range and intensity of services provided by the grantee as well as by the number of participants served.

Record Type	Hrs. Per Record	PY 17 Estimated National Count of Participants	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Participant	1.8	6,000	10,800	$14.44	$155,952

(2). Quarterly Performance Report Burden, ETA-9136 or ETA-9173

The *quarterly performance report (QPR) burden* assumes that all grantees will use an ETA-provided CMS to generate quarterly performance reports. The CMS applies edit checks to participant data and generates facsimiles of the aggregate information on enrollee characteristics, services provided, placements, outcomes, and follow-up status in quarterly report format. The burden includes reviewing and correcting errors identified by the CMS in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Performance Report	64	210	13,440	$14.44	$194,073.60

(3). Work Site Description, ETA-9143

A. Work Site Description: As part of the grant application, prospective applicants are required to submit information about the work site(s) that will be used as training for YouthBuild participants using the Work Site Description form. Grantees are also required to submit this form at any point when they propose to utilize an additional work site during the period of performance to guarantee that the grantee has access to a suitable and qualifying work site property to use in the training of YouthBuild participants. They must submit unique forms for each work site proposed. This form includes information on estimated construction costs and sources of funding. The burden is estimated at 30 minutes per submission with one submission per prospective applicant; this burden, annualized over the three-year period of this request for extension, is 10 minutes per year.

Prospective Applicants

Report	Average Annualized Hrs. Per Year Per Prospective Applicant	Average Number of Applicants*	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Work Site	.5 hour	230	115	$14.44	$1,660.60

Description					

*Based on the average number of applications received in ETA's last three YouthBuild competitions.

ETA estimates that grantees will submit three work site forms over the course of the two years of active program services for each grant period of performance. The burden is estimated at 30 minutes per submission with three submissions per grantee; this burden, annualized over the three-year period of this request for extension, is 30 minutes per year.

Existing YouthBuild Grantees

Report	Annualized Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Work Site Description	1 hour	210	210	$14.44	$3,032.40

B. Housing Census Form: Grantees are required to submit information on the number of houses or apartments built or renovated by YouthBuild participants on annual basis. The burden is estimated at 30 minutes annually.

Report	Annualized Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Housing Census Form	.5 hour	210	105	$14.44	$1,516.20

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	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Participant Data	6,000	Once	6,000	1.8	10,800	$14.44	$155,952

Collection, ETA-9138							
QPR, ETA-9136	210	Quarterly	840	16	13,440	$14.44	$194,073.60
Work Site Description (prospective applicants), ETA-9143	230	Once/Funding Opportunity Announcement	230	0.5	115	$14.44	$1,660.60
Work Site Description (existing grantees), ETA-9143	210	Twice per year	420	0.5	210	$14.44	$3,032.40
Housing Census Form, ETA-9143	210	Annually	210	0.5	105	$14.44	$1,516.20
Unduplicated Totals	*--*	*--*	*7,700*	*--*	*24,670*	*--*	*$356,234.80*

* Hourly rates used to calculate cost depend upon the type of organization administering the program. For private non-profit grantees, the hourly rate is the average hourly earnings in the Census Bureau's social assistance industry category (June 2017, Current Employment Statistics Survey, U.S. Census Bureau). Source: http://www.bls.gov/web/empsit/ceseeb8a.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).*

   a) **Start-up/capital costs:** There are no start-up costs, as ETA provides grantees with a free, web-based, data collection and reporting system that grantees use to collect and maintain participant data, apply edit checks to the data, and generate the quarterly reports.

   b) **Annual costs:** There are no annual costs, as ETA covers the annual maintenance costs for the free, web-based, data collection and reporting system.

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 performance reporting as outlined in Table 4 below. Costs for ETA staff to review submitted quarterly narrative performance reports will be $162,487.85 per year for continuing operations.

Table 4 - Cost of YouthBuild Reporting System Review to Federal Government

Continuing Operations Per Year to Support YouthBuild Reporting System	
5 GS-13 in Region 1 (1/20 time)	$23,630.00
5 GS-13 in Region 2 (1/20 time)	$23,096.75
5 GS-13 in Region 3 (1/20 time)	$22,505.75
5 GS-13 in Region 4 (1/20 time)	$22,861.75
5 GS-13 in Region 5 (1/20 time)	$23,652.50
5 GS-13 in Region 6 (1/20 time)	$25,763.25
2 GS-11 in National ETA Office (1/20 time)	$6,651.00
1 GS-12 in National ETA Office (1/20 time)	$3,986.00
1 GS-13 in National ETA Office (1/20 time)	$4,739.80
1 GS-14 in National ETA Office (1/20 time)	$5,601.05
Total Cost	**$162,487.85**

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.*

The decrease in burden is due to a reduction in the number of prospective applicants to this program, from an average of 425 three years ago to an average of 230 currently. Similarly, total annual burden hours decreased from 36,812.5 to 24,670 and the total burden cost has been reduced from $501,386.25 to $356,234.80.

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.*

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

Each year, ETA issues an annual report summarizing program performance based on the Secretary's goals. Data contained in the YouthBuild QPR 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. All reports are available on the internet and accessible to the public.

Product	Submission Date	Comments
Quarterly Performance Report	Within 45 days after the end of the quarter.	Quarterly progress reports and performance data will be submitted electronically using the YouthBuild MIS Case Management system.
Work Site Description	Prospective Applicants: Submit with grant application. Existing Grantees: Submit an average of three additional Work Site Description forms during the life of the grant	Work Site Descriptions are submitted electronically by both the prospective applicants and existing grantees.
Annual Housing Census	Annually within 45 days of grant award anniversary date	Annual Census reports will be submitted electronically.

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.*

ETA displays the OMB Expiration Date**.**

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

No exceptions are requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not contain statistical methods.