

SUPPORTING STATEMENT
TRADE ADJUSTMENT ASSISTANCE COMMUNITY COLLEGE AND CAREER
TRAINING GRANT PROGRAM REPORTING REQUIREMENTS
OMB Control Number 1205-0489

A. Justification.

This revision information collection request (ICR) extends the currently approved reporting requirements for Round 2, 3 and 4 grantees of the Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant program. The ICR was originally approved in 2012; subsequent extensions and non-substantive changes were requested to a) extend the ICR throughout the grantees' periods of performance; b) clarify certain language in the instructions; and c) remove sections of forms that only related to Round 1 grantees after that Round ended on September 30, 2015. The revisions included in this request will update the forms; the revisions are summarized below.

The U.S. Department of Labor, Employment and Training Administration (ETA) originally requested this ICR for all four (4) rounds of TAACCCT grants. As of July 31, 2018 only the fourth and final round of grants is still active and Round 4 grantees have one more reporting period that ends September 30, 2018. When that reporting period is complete ETA will request a discontinuance to end this ICR on September 30, 2019.

ETA requires grantees to submit Quarterly Progress Reports with a narrative summary each quarter. Every fourth quarter, grantees submit an Annual Performance Report with standardized outcome measures that will include aggregate data for program participants for the following ten outcome measures: unique participants served/enrolled; total number of participants who have completed a grant-funded program of study; total number still retained in their programs of study; total number retained in other education programs; total number of credit hours completed; total number of earned credentials; total number pursuing further education after program of study completion; total number employed after program of study completion; total number retained in employment after program of study completion; and the total number of those employed at enrollment who receive a wage increase post-enrollment.

The current revision is necessary to collect the final Quarterly Progress Report and the final Annual Performance Report from the fourth and final round of TAACCCT grants. This ICR is a revision with no changes to the data collection elements, and only the following minor changes:

Grantee Reporting Handbook

- Corrected expiration date from 7/30/2018 to 7/31/2018
- Renamed the document title for clarity, to "TAACCCT Round 2-3-4 Reporting Handbook 2018"
- Reworded reference to Attachments throughout to eliminate confusion
- Added list of accompanying documents, with revised document names, specifically:
 - TAACCCT Round 2-3-4 APR Form 2018
 - TAACCCT Round 2-3-4 Participant-Level Data Elements 2018

o TAACCCT Round 2-3-4 QNPR Form 2018

Annual Performance Report (APR) Form

- Corrected expiration date from 7/30/2018 to 7/31/2018
- Renamed the document title for clarity, to “TAACCCT Round 2-3-4 APR Form 2018”

Participant-level Data Elements

- Renamed the document title for clarity, to “TAACCCT Round 2-3-4 Participant-Level Data Elements 2018”

Quarterly Narrative Progress Report Form

- Corrected expiration date from 7/30/2018 to 7/31/2018
- Renamed the document title for clarity, to “TAACCCT Round 2-3-4 QNPR Form 2018”

Revised Information Collection instruments are attached.

- TAACCCT Round 2-3-4 Reporting Handbook 2018
- TAACCCT Round 2-3-4 Participant-Level Data Elements 2018
- TAACCCT Round 2-3-4 APR Form 2018
- TAACCCT Round 2-3-4 QNPR Form 2018

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.*

ETA’s statutory authority to administer this program, issue guidelines including performance reporting by grantees, and assess the impact of each award on workers served by grantees comes from section 1872 of the Trade and Globalization Adjustment Assistance Act of 2009 (Division B, Title I, Subtitle I of the American Recovery and Reinvestment Act of 2009, Public Law 111-5) (19 U.S.C 2372a), as amended by the Health Care and Education Reconciliation Act of 2010, Public Law 111-152.

Specifically, 19 U.S.C. 2372 – 2372 requires that the Secretary prepare and submit to Congress an annual report regarding the programs and activities carried out under the TAACCCT grant program, providing:

- A description of each grant awarded during the preceding fiscal year
- An assessment of the impact of each award in a fiscal year preceding the fiscal year referred to in paragraph (1) on workers receiving training under the TAA for Workers Program

The data collection is also designed to help ETA and grantees assess progress made against the grant statements of work, or grant plans, as submitted to ETA during consideration for funding. The descriptions of capacity-building, activities, and deliverables in the Quarterly Progress

Report allows grantees flexibility to show successes or challenges against their own unique programs. In addition, ETA requires standard quantitative data collection in order to help monitor participants served and outcomes achieved across grants in a similar way. ETA requires grantees to collect and report on the common performance measures that are applied across other programs administered by ETA. The common measures help to describe the core purposes of related investments: How many people found jobs? Did people stay employed? What were the average earnings?

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.*

ETA uses the information that grantees report for the following purposes:

1. To provide program and performance information to stakeholders, including participants, employers, taxpayers, Congress, and others;
2. To inform continuous improvement of the quality, effectiveness, and efficiency of the programs;
3. To provide management information for use in Federal program administration and oversight, including grant-specific participation and outcome summaries; and,
4. To fulfill ETA's compliance with the Government Performance and Results Act (GPRA) and to complete the OMB Performance Assessment Rating Tool (PART) review as required.

If the current OMB-approved package is discontinued upon current expiration (July 31, 2018), ETA will be unable to collect final performance data from the fourth and final round of TAACCCT grants for the purposes described above. Further, because this is the final round of grants, the discontinuance of OMB control number 1205-0489 will also prevent ETA from reporting on the success of the TAACCCT grants as a whole met their goals for successful implementation of the programs they anticipated developing.

In addition, a disruption in data collection would have very dire consequences to an ongoing TAACCCT program outcomes evaluation. The TAACCCT Evaluation, being conducted by an independent external evaluation firm overseen by DOL's Chief Evaluation office, includes an implementation study that will provide lessons on the design, implementation, and operation of these programs, and an outcomes study which will examine participants' educational attainment, employment and earnings. Both the Annual Performance Report and the quarterly narrative information reported by grantees are used in the evaluation. Significant resources have been dedicated to the study. The outcomes study and this investment would be put at risk if the study is unable to continue or lacks the power to detect program outcomes.

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, collection of aggregate data and the preparation of quarterly reports is consistent with report formats and data definitions to grantees across ETA programs. All the TAACCCT reports are submitted to ETA via the Internet. It is left to grantees to select the technology to collect aggregate data according to their unique circumstances and resource availability.

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.

TAACCCT grantees submit quarterly financial reports. These reports are the only reports currently required for TAACCCT grantees to report on program performance. Other ETA reports may track some TAACCCT participants if they participate in other ETA-funded programs.

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

Some small businesses may be contacted by grantees to obtain information on participants' outcomes, such as post-program employment and earnings information. Grantees can reduce a portion of this burden by collecting information directly from participants or via administrative wage records.

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 data are needed both for program monitoring efforts to assist grantees and for ETA to provide information to the public on this program. If grantees do not report quarterly, ETA will be unable to discern problems and identify grantees needing technical assistance. Ultimately, the quality of these programs could be compromised to the detriment of participating workers and employers. ETA's responsibility for reporting, oversight, and monitoring would be hampered because there is no other vehicle for judging the progress and performance of TAACCCT grants. The agency would be unable to fulfill its responsibilities under GPRA or to submit required information to OMB for completion of the PART as required.

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.

There are no special circumstances for data collection related to the quarterly narrative or aggregate data reported every fourth quarter under the grant agreement. Any adjustments necessary for using supplemental information as the data source will be addressed in separate program guidance.

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 comment on the Federal Register Notice published on February 2, 2018 (83 FR 4926). No public comments were received.

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 funds provided under the grant agreement.

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

While this information collection makes no express assurance of confidentiality, ETA is responsible for protecting the privacy of the TAACCCT 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. This data is covered by a System of Records Notice, DOL/ETA-15, published April 8, 2002 (67 FR 16898 et seq). The Department is working diligently to ensure 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 privacy of the data. The aggregate information collected through this request will not contain any individually identifying information.

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 grantees will ask sensitive questions of participants in the proposed data collection for the purpose of collecting demographic and outcome data, ETA will only collect aggregate data summarizing participants and their experiences every fourth quarter as part of the Annual Performance Report. Participant responses to these sensitive questions will allow ETA and the grantees to comprehensively evaluate the effectiveness of the TAACCCT grant program.

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

The annual national burden for the TAACCCT grants has three components: (1) the burden for collection of data on individual participants in order to calculate the Annual Performance Report (APR), (2) the burden of preparing the APR, (3) the burden of preparing the narrative for the Quarterly Narrative Progress Report (QNPR). The total burden is reflected in the chart at the end of this section.

1) Participant Data Collection Burden.

The participant data collection burden considers both the amount of individual participant information collected that is necessary for a grantee to provide aggregate annual data as reflected in the Annual Performance Report (APR), and the amount of information provided by participants. The chart below reflects the figures for the remaining TAACCCT grants affected by an extension.

Only 71 Round 4 will still be active during the extension. Based on projections from previous rounds, 86,676 participants will be served by these grants. We assume that the grantees will spend 3.0 minutes to collect each element, and that participants will spend 3.0 minutes to provide each element for a combined total of 6.0 minutes per data element. These estimates are based on other grant reporting packages we have submitted and we have not received any comments from grantees indicating otherwise. Grantees will need to collect 10 data elements per participant to complete the Annual Performance Report. This leads to an estimate of three minutes per record for the grantees and three minutes per record for the participants, or six minutes total.

The hourly rates used to calculate cost depend upon the type of organization administering the program. For private nonprofit grantees, we use the estimated hourly rate of the average hourly earnings in the Census Bureau's social assistance industry category, which is \$16.58. (Source: Bureau of Labor Statistics, Quarterly Census of Employment and Wages as of May 2018 <https://www.bls.gov/iag/tgs/iag624.htm>).

2) Annual Performance Report Burden.

The TAACCCT annual report burden includes program run times, checking, formatting, and transmitting the annual performance reports to ETA.

Based on past experience, the annual report produced will require about 48 hours to prepare, generating an annual burden of 48 hours per grantee, as only one report is required per year. Because the fourth round is the only active round, it is the only round that will submit an annual report during the extension.

3) Quarterly Progress Report Burden.

The burden to produce the TAACCCT narrative for the quarterly progress report includes the time it takes to write, review, and submit the report.

Only Round 4 will be active during the extension, and only one quarterly progress report will be required during this time period due to the remaining time in the period of performance. Using an average of 66 minutes per sub-section, we calculated a total of 22 hours to complete the report, based on past experience.

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
Participants Data Collection	86,676	1	86,676	6 minutes	8,668	\$16.58	\$143,715
Annual Performance Report	71	1	71	48 hours	3,408	\$16.58	\$56,505
Quarterly Progress Report	71	1**	71	22 hours	1,562	\$16.58	\$25,898
Unduplicated Totals	--	--	86,818	varies	13,638	--	\$226,118

*SOURCE: Bureau of Labor Statistics, Quarterly Census of Employment and Wages, "Industries at a Glance, Social Assistance: NAICS 624," as of May 2018. <https://www.bls.gov/iag/tgs/iag624.htm>.

**Although grantees report quarterly, only one reporting quarter remains for TAACCCT Round 4 within the extension period.

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).

Grantees can use grant funds to comply with Federal reporting requirements; as such, costs are considered to be \$0 per grantee.

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.

ETA collects and maintains all quarterly reports through its Office of Information Security and Technology's on-line Enterprise Business Support System (EBSS). Since the electronic mechanisms for collecting and storing grantee performance data on a quarterly basis are already in place to support other ETA programs, the annualized cost to the Federal government (maintaining the quarterly and annual reports and records through EBSS, matching SIR data with state UI wage records and other Federal employment databases, generating quarterly performance reports and any program close-out activities) for TAACCCT grant reports is minimal.

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

Because three of the four rounds of TAACCCT grants have ended, and the fourth round will have only one quarterly progress report and one annual performance report left to submit during the extension, the burden has been reduced. The new totals have changed from 848,032 annual responses to 86,818 total annual responses, and from 66,390 burden hours to 13,638 burden hours.

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 quarterly progress reports through ETA's online reporting system to ETA within 45 days of the end of each quarter. Annual Performance Reports are submitted through ETA's online reporting system to ETA within 45 days of the end of the fourth quarter. Quarterly progress and annual performance report data is analyzed by ETA staff and used to evaluate outcomes and program effectiveness.

Each year, ETA issues a report summarizing program performance based on the Secretary's goals. Data contained in the quarterly and annual reports may be included in these reports. The data is also used to prepare management and budget reports, and other ad hoc reports, which are available on the internet and accessible to the public.

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.