SUPPORTING STATEMENT
PRE-APPRENTICESHIP—PATHWAYS TO SUCCESS
OMB Control Number 1205-0520

A. <u>Justification.</u>

The Employment and Training Administration (ETA) Office of Apprenticeship (OA) is requesting approval for revisions to the Pre-Apprenticeship – Pathways to Success database. The collection instrument is adding several questions to reflect the expansion of the apprenticeship system as outlined in the 2017 Presidential Executive Order "Expanding Apprenticeships in America" https://www.whitehouse.gov/presidential-actions/3245/, particularly incorporating secondary and post-secondary institutions as potential providers of pre-apprenticeship programs.

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.

Quality pre-apprenticeship programs play a valuable role in preparing entrants for apprenticeship programs and in contributing to the development of a diverse and skilled workforce. Pre-apprenticeship programs can be adapted to meet the training needs of differing populations in the context of opportunities available in local labor markets. The online database of quality pre-apprenticeship programs provides a valuable tool for job seekers, apprenticeship programs, and American Job Centers' (AJC) front line staff. This dedicated database also provides a way for job seekers and apprenticeship programs to access pre-apprenticeship programs in their local areas.

ETA does not currently, nor is it planning to, register or certify pre-apprenticeship programs. The pre-apprenticeship programs listed in the database have not been certified as high-quality by ETA. Any designations of these programs as high-quality are the function of self-attestation by the program sponsors. Instead, ETA uses this database to connect pre-apprenticeship providers with apprenticeship programs. Through technical assistance, ETA also seeks to improve the consistency and quality of these pre-apprenticeship programs.

Finally, this national database of pre-apprenticeship programs facilitates connections between pre-apprenticeship program participants and apprenticeship program sponsors. The database is a web-based information tool that identifies the nearest pre-apprenticeship program and describes the services and training it provides to prepare participants for eligibility for apprenticeship programs.

Apprenticeship programs combine paid, on-the-job learning with related technical/theoretical classes in a career field. Industries and employers are highly involved in the development and implementation of the programs. Apprenticeships offer job seekers immediate employment opportunities that pay good wages and lead to career growth, highly-sought life

and skill sets, portable credentials and the opportunity to apply their apprenticeship training to two- and four-year post-secondary programs.

TEGL XX-XX, *Updates to Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources*, defines the term "pre-apprenticeship program."

The Apprenticeship System is administered by ETA's OA, which oversees Registered Apprenticeship programs as well as State Apprenticeship Agencies (SAAs). The National Apprenticeship Act of 1937, (subsequently referred to as "the Act") Section 50 (29 U.S.C. 50), authorizes and directs the Secretary of Labor "to formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices, to extend the application of such standards by encouraging the inclusion thereof in contracts of apprenticeship, to bring together employers and labor for formulating programs of apprenticeship, to cooperate with State agencies engaged in formulating and promoting standards of apprenticeship, and to cooperate with the Secretary of Education in accordance with Section 17 of Title 20. Section 50a of the Act authorizes the Secretary of Labor to "publish information relating to existing and proposed labor standards of apprenticeship," and to "appoint national advisory committees..." (29 U.S.C. 50a). The administration of the system is guided by Title 29 Code of Federal Regulations (CFR), part 29, regulations that were updated in 2008 to address the 21st century workforce needs as well as enhance accountability of the recognized SAAs.

On June 15, 2017, the President issued an Executive Order (EO) entitled, "Expanding Apprenticeships in America," which directs DOL to further expand apprenticeship opportunities, to engage our partner Federal agencies in promoting apprenticeships, and to attract businesses from a growing range of sectors to sponsor apprenticeships. The EO called for the development of a new model – Industry-Recognized Apprenticeship -- to provide greater flexibility in meeting needs of business and to add more than 1 million new apprentices over the next five years. Industry-Recognized Apprenticeships will give business and industry more autonomy to develop work-based learning programs that help an individual earn a wage while also earning credentials employer's value most.

The national database of pre-apprenticeship programs is helping to facilitate connections between pre-apprenticeship program participants and apprenticeship program sponsors. This web-based information-gathering tool helps a variety of workforce system customers and practitioners (i.e., job seekers, apprenticeship programs, and AJCs' front line staff) to identify the nearest pre-apprenticeship program (geographically by zip code or city/state). The organizations that provide input information into the database are:
✓ Community-based organizations (CBOs);
✓ Faith-based organizations;
✓ Apprenticeship programs;
✓ Labor organizations;
✓ Employers;
✓ High schools; and
✓ 2- and 4-year post-secondary educational institutions

These organizations self-identify themselves as having a quality pre-apprenticeship program.

Audience for the Directory: Job seekers; AJCs' front line staff; apprenticeship programs; CBOs; Faith-based organizations; high schools; and 2- and 4-year post-secondary educational institutions.

Data for each program listed includes:
- Industries they are serving;
- Occupations for which they offer training;
- Connections to apprenticeship programs;
- Number of participants they serve;
- Population they serve;
- Support services available; and
- Menu of preparatory skills they teach to train pre-apprentices.

This voluntary data collection is an online form.

Those looking to find information about pre-apprenticeship programs can go on a map on a website, click on a state, and be able to see where the pre-apprenticeship programs are located as well as general information about the programs. This system facilitates partnerships between apprenticeship programs and pre-apprenticeship programs, resulting in expanded opportunities for underrepresented populations. Pre-apprenticeship training programs have successfully demonstrated that obstacles such as low math skills, poor work habits, lack of access to transportation, and lack of knowledge of sector opportunities can be overcome through coordinated training and support.

Application for Pre-Apprenticeship Programs:

Step 1 asks the program for contact information including the name of the program, name of program director and an alternate point of contact for the program.

Step 2 asks about the population served and if the program has a direct link to an apprenticeship. It also asks for the information on the nature of the direct link or partnership.

Step 3 asks about the curriculum. Was it developed with input from an apprenticeship program or industry? Does the training lead to a credential or certificate? Has the training been approved by an apprenticeship program?

Step 4 asks about other services the pre-apprenticeship program provides to participants (i.e., supportive services beyond training to the most-in-need participants). Does the program conduct skill assessments? Does the program include case manager(s)? Does the structure of the program offer a real work environment? What industries are serviced by the program? What occupation(s) does the program offer training in?

Regulations

See OA's website at: http://www.doleta.gov/oa/pdf/FinalRule29CFRPart29.pdf.
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 purpose of the information collection is to add to the public database and website on pre-apprenticeship programs. The database helps expand opportunities for underrepresented populations to enter apprenticeship programs. Pre-apprenticeship training programs have successfully demonstrated that obstacles such as low math skills, poor work habits, lack of access to transportation, and lack of knowledge of sector opportunities can be overcome when coordinated training and support are provided to workers. Women in particular can benefit from pre-apprenticeship programs that provide training and ultimately employment opportunities in such high-wage and high-growth sectors as construction, manufacturing, Information Technology and other industries in which women have been underrepresented.

The pre-apprenticeship database benefits employers by providing them access to a larger labor pool, and workers have more opportunities to access high-wage employment and career pathways, with benefits such as healthcare and pensions.

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.

The application is web-based and easy to navigate. An OA employee is available to provide full technical assistance and services to those sponsors, colleges and organizations/associations that lack computer technology. Once the Office of Management and Budget (OMB) approves the updated form submitted with this ICR, ETA will add the updated instrument (questionnaire) to the online database.

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.

Articulation agreement information is not required in the Registered Apprenticeship Partner Information Data System (RAPIDS), nor is ETA aware of any database that collects this information, so the information provided (on a voluntary basis) is not duplicative.

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

The information collected by the pre-apprenticeship database has a minimal impact on small businesses. This information collection requests only basic information to help individuals

and other interested parties find the information needed to contact pre-apprenticeship programs.

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.

Failure to conduct this voluntary information collection would extensively limit the information OA collects and disseminates on pre-apprenticeship programs. The updated questionnaire will allow new pre-apprenticeship stakeholders to provide information on their programs. This will facilitate wider access to pre-apprenticeship programs.

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.

No special circumstances are involved. The information is collected in a manner consistent with paperwork reduction requirements.

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 May 29, 2018 (83 FR 24501). No public comments were received.

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

This information collection does not involve payments to respondents.

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

No assurance of privacy is provided, and information collected will be posted on a public website. The agency notes, however, that no information which compromises privacy is requested.

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.

No information is collected that is considered to be of a sensitive nature.

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

The purpose of the data collection is to maintain a list of pre-apprenticeship programs. Organizations will be asked to update information once every three years, particularly regarding the point of contact and any additions or changes to their training or curriculum support services. OA will ensure that updated information comes from the authorized organization by having updates go to a designated e-mail account. Upon receipt and review, OA staff will verbally verify the information with the organization, with the total annual estimated burden at 10 minutes per organization and 5 minutes per OA's federal staff member. The estimate is based on prior program experience with collecting information for the Registered Apprenticeship College Consortium (RACC) via the ETA website (http://doleta.gov/oa/racc.cfm). See OMB control number 1205-0512.

OA does not maintain detailed information on the number of pre-apprenticeship programs nationwide, as that information is not required in the program's case management system— RAPIDS. However, OA estimates that of the 22,000 Registered Apprenticeship Program Sponsors nationwide-approximately 10% or 2,200 have a relationship with a pre-apprenticeship program. Please note that the number of program sponsors is captured in our case management system. See OMB control number 1205-0223. Furthermore, the 10% of programs having a pre-apprenticeship relationship is based on ETA knowledge of existing pre-apprenticeship programs. OA estimates that it will take a representative from a pre-apprenticeship program approximately 14 minutes to enter information on the form, including the time necessary to research and gather information, added to the 7 minutes on the phone with an OA staff member to verify the information. Of the estimated 2,200 pre-apprenticeship programs nationwide in Fiscal Year (FY) 2018, we estimate that 100 such programs will voluntarily join the directory each year. This estimate is based on prior experience with collecting information via the website for the RACC. See OMB control number 1205-0512.

Annual Burden Hours

Respondents: 100 pre-apprenticeship programs times 14 minutes per form entered online = 14 minutes x 100 entries and 7 minutes for oral verification by phone with an OA staff person. This equates to a total of 21 minutes per entry x 100 programs = 35 hours. OA believes that approximately 100 pre-apprenticeship programs will be added annually to the database.[1] Thus the annual total for this one-time cost is 35 hours.

The respondent's directory information will be reviewed once every three years to ensure that the point of contact information and the program information are current. OA will email the program a form with the existing information. We estimate it will take no more than five minutes for the respondent to review, update the information (if necessary), and email the form back to OA. Total: 5 minutes x 100 updates annually = 8 hours.

ANNUAL RESPONDENT TOTAL: 35 hours + 8 hours = 43 hours

Annual Cost to Respondents: 43 hours x $17.75 = $763 (rounded).

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
Organization enters data on form and OA verification of data	100	First year	100	21 minutes	35	$17.75	$621
Organization provides annual update of data	100	Annually	100	5 minutes	8	$17.75	$142
Unduplicated Totals	--	--	*200*	--	*43*	--	*$763 (rounded)*

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[1] ROCIS includes an annually estimate of 300 pre-apprenticeship programs because maintenance and updating applies to all program included in the collection

* The $17.75 mean hourly rate for the respondents' clerical staff was obtained from DOL, Bureau of Labor Statistics Occupational Employment Survey, May 2017: 43-6014 Secretaries and Administrative Assistants, Except Legal, Medical, and Executive (http://www.bls.gov/oes/CURRENT/oes436014.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).

There are no additional costs other than those mentioned in Number 12 above.

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.

There is a cost to maintain the online form/website to gather and track information for this collection. The annualized cost over three years is $1,000 ($1,000 + $1,000 + $1,000)/3 years = $1,000 per year. Finally, we are estimating a similar amount (16 hours x $49.56 = $793) for annual Federal oversight for maintenance of the online form and website. Thus, $1,000 + $793 = $1,793.

This estimate includes costs of Federal oversight for the initial development and maintenance of the online form and website.

The burden to the Federal government based on the GS-13/3 salary of $49.56 per hour from the Office of Personnel Management (OPM) General Schedule for the Washington DC area effective January 2018 is primarily for review and management of the materials submitted by the sponsors to the online form/website. The annualized cost of reviewing, verifying, and updating with the respondents the anticipated 100 responses (100 responses x 5 minutes, which equates to 8 hours x $49.56) is $396.

TOTAL ANNUALIZED COSTS: $1,793 + $396= $2,189

Maintenance costs of database (First three years, annualized)	$1,793	N/A
Annual Federal staff cost for reviewing and updating materials	$396	8 hours for annual review

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

This information collection is a revision with changes made to the questionnaire to reflect the expansion of the apprenticeship system. OA has added several new questions to a few sections of the questionnaire, and has made minor edits to individual questions. OA has

updated annual burden time to reflect the time it will take respondents to complete the revised instrument. OA anticipates that the extra questions will take respondents an additional 4 minutes to complete. Therefore, it will take respondents 14 minutes to complete the questionnaire instead of 10. It will also take OA staff 7 minutes to review the data with the respondent instead of 5 minutes.

Below is a summary of the changes made to the burden worksheet:

	Federal Government*	**Respondent (average of 100 respondents per year)**
Current burden hours (100 respondents annually)	16 hours	33 hours

	Federal Government	**Respondent (average of 100 respondents per year)**
Burden hours after renewal (100 respondents annually)	35 hours for initial data entry 8 hours for updates	43 hours

* The current burden hours and annual cost was based on the GS-12/5 salary of $41.48 per hour from the OPM General Schedule for the Washington DC area effective January 2015.

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.

Information will be available on the website and accessible to the public. ETA anticipates information to be posted to a public online directory within one month after the respondent enters the information online.

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 is not requesting a waiver for the display of the OMB expiration date. It will be displayed on the website and in any ETA/OA issuances.

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

There are no exceptions applicable for this submission.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.