

SUPPORTING STATEMENT
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)
OMB CONTROL NUMBER 1205-0040

A. Justification.

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.*

Background

This information collection revision request contains information relating to the State Plan, Annual Grant Planning and Allotment Requirements, and Performance Accountability reporting for the Senior Community Service Employment Program (SCSEP).

The SCSEP, authorized by Title V of the Older Americans Act Reauthorization Act of 2016, (Pub. L. 114-144) (OAA-2016) is a community service and work-based training program for older workers. The program provides subsidized, work-experience training for low-income persons 55 or older who are unemployed and have poor employment prospects. SCSEP national grants are awarded through a competitive process; state and territorial grants are awarded through a formula outlined in the OAA-2016 Section 506 (b-c). The dual goals of the program are to promote useful community service employment activities and to move SCSEP participants into unsubsidized employment, so that they can achieve economic self-sufficiency.

The Department is required to collect the information described below in order to comply with the OAA statutory and regulatory requirements. The information is also necessary for grantee performance accountability and program management. Table 1 at the end of this section provides a reference by topic for each collection instrument used in this information collection and the related statutes and regulations.

State Plan

In order to receive SCSEP funds, the OAA-2016 requires the Governor of each State, or his or her designee, to submit a plan as an independent document (stand-alone) or as part of the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan that outlines a four-year strategy (and a two-year modification of this strategy) for the statewide provision of community service employment and other authorized activities under the SCSEP. Every four years, the Department issues a SCSEP State Plan Requirements Training and Employment Guidance Letter (TEGL) that requests the grantees to describe the planning and implementation process for SCSEP services in the State, taking into account the current relative distribution (described more fully below) of eligible individuals and employment opportunities within the State and two years afterwards, the Department issues a State Plan Modification TEGL requiring grantees to submit any updates to their plan. (OAA-2016 Section 503(a) and 20 CFR 641.300-370).

Equitable Distribution Report

Section 508 of OAA-2016 requires States, in conjunction with national grantees operating in the state, to submit an Equitable Distribution Report at the beginning of each fiscal year that details an equitable allocation of SCSEP resources within the state based on county-by-county data showing the number of SCSEP-eligible persons in the population from the most recent U.S. Census. The report shows whether areas are serviced equitably or are being underserved or overserved. (OAA-2016 Sections 507-508 and 20 CFR 641.360, 365, and 879(c).

Annual Grant Planning and Allotment Requirements

The SCSEP project is comprised of State and National grantees. SCSEP provides funding based on a formula to States, territories and National grantees. The funding for the national grantees are issued through a competitive process to national non-profit organizations every 4 years (subject to annual appropriations), with an optional one-year extension at the Department's discretion through a Funding Opportunity Announcement. Funds are renewed annually and are allocated by a formula set forth in Section 506 of the OAA-2016. The Employment and Training Administration (ETA) releases a grant planning guidance TEGl each year to provide SCSEP grantees with funding and authorized position amounts and instructions for preparing their budgets and document submissions for the annual grant renewal based on the OAA Title V appropriation. (OAA-2016 Sections 502 and 506 and 20 CFR 641.400-495).

Performance Accountability

SCSEP grantees must submit updated data on participants (including data on demographic characteristics and data regarding performance measures), host agencies, and employers in an electronic format specified by the Department. The Department generates SCSEP Quarterly Progress Reports (QPRs), as well as the final QPR, as soon as possible after receipt of the data. (OAA-2016 Sections 513-514 and 20 CFR 641.700-740).

The OAA-2016 amended the SCSEP performance measures and required the Department to implement the new measures by December 31, 2017. This requirement was satisfied by the publication of an Interim Final Rule on December 1, 2017

(<https://www.gpo.gov/fdsys/pkg/FR-2017-12-01/pdf/2017-25834.pdf>). The OAA-2016 aligned SCSEP performance measures with the three employment outcome indicators mandated for WIOA core programs. This PRA package seeks to align and amend the information that the Department requires grantees to certify and/or submit on a quarterly, annual, or as needed basis (to include the amended measures). This information collection request (ICR) will extend ETA's ability to:

- use previously approved information collection (ETA 9120 – Participant Form, ETA 9121 – Community Service Assignment Form, ETA 9122 – Exit Form, and ETA 9123 – Unsubsidized Employment Form) to collect information on SCSEP's PY 2017 measures and allow for the closeout of those measures through the end of PY 2017 on or about September 30, 2018;
- add ETA 9180A (Negotiation Calendar Template), ETA 9180B (Grantee Sub-State Data Template), ETA 9181 (Discretionary Transfer Instructions for SCSEP), ETA

9182A (SCSEP Release and Authorization Photography), and ETA 9182B (SCSEP Consent for Use and Publication of Information) for SCSEP programmatic, reporting, and accountability reasons;

- make minor updates to the legacy system, SCSEP Performance and Results QPR System (SPARQ), to meet the performance requirement under OMB Control # 1205-0040 during the beginning of PY 18 starting July 1, 2018; and
- facilitate SCSEP's transition into the new ETA-CMS discussed below (Sections 513 and 514 of OAA-2016 and 20 CFR 641.700, 879(b)).

One of the added performance measure that the OAA-2016 requires the Department to report on is “Indicators of effectiveness in serving employers, host agencies, and participants” which partially aligns with the WIOA measure, “effectiveness in serving employers”. This was similar to the measure for “satisfaction of the participants, employers, and their host agencies with their experiences and the services provided” that was included as an additional measure in the 2006 OAA sec. 513(b)(2), which was not subject to goal-setting and corrective actions. ETA captures this measure by administering customer service surveys to each of these customer groups. As stated in the Interim Final Rule and in Part B of this OMB control number, ETA will continue to use the existing customer satisfaction surveys to report the American Customer Satisfaction Index (ACSI) score to meet this statutory requirement, at least on an interim basis. (Section 513(b)(1)(E) of OAA-2016 and 20 CFR 641.700 and 710).

Section 513(a)(2)(C) of OAA-2016 permits grantees to negotiate proposed goals with the Department. This negotiation process takes place prior to the beginning of the new program year and is scheduled with the grantees for two-weeks. This information collection seeks the use of a SCSEP Goal Negotiation Calendar, which ETA uses to schedule such negotiations, and the template that grantees use to submit data in support of their proposed revised goals. (Section 513(a)(2)(C) of OAA-2016 and 20 CFR 641.700-740).

To facilitate an integrated performance reporting system that provides aggregate data, ETA is modernizing the Workforce Integrated Performance System (WIPS) – an electronic performance reporting system for the Department’s employment and training grants— and the ETA Case Management System (ETA-CMS). These systems will eventually replace SPARQ. ETA estimates SCSEP’s transition to the new system to occur during the second quarter of PY 2018, and expects grantees to begin reporting and generating performance and programmatic reports via the new system sometime thereafter. As mentioned above, ETA expects that SPARQ will continue to operate during PY 18 after WIPS and ETA-CMS systems are fully operational for our grantee needs, but will be used for necessary historical and follow-up performance data needed for programmatic purposes.

SCSEP grantees will report on the seven performance measures referenced above in their QPRs. The QPR provides grantees a snapshot of their program outcomes as required by the OAA-2016 and will be automatically generated by WIPS.

ETA will collect the participant level information through the ETA-CMS Elements that are included in this information collection request (ICR). In May 2017, ETA moved SCSEP’s performance related data elements into OMB Control Number 1205-0521(DOL-only Performance Accountability, Information, and Reporting System) as part of its effort to streamline program performance reporting. To avoid duplication, the performance related data elements are no longer being collected under this information collection.

ETA uses the ETA-CMS elements discussed above to record information about SCSEP program participants and to measure grantees’ progress toward OAA-2016 requirements. As part of this revision request, updates are made to the ETA-CMS Elements (via ETA 9120 – Participant Form, ETA 9121 – Community Service Assignment Form, ETA 9122 – Exit Form, and ETA 9123 – Unsubsidized Employment Form) to comply with OAA-2016. Grantees currently provide this information via SPARQ. In PY 2018, ETA plans to implement the ETA-CMS, which will include all SCSEP and other ETA programs’ participant level data elements. In an effort to streamline ETA’s information collection, ETA will incorporate the ETA-CMS elements into Control No. 1205-0521 at a later date. ETA is submitting ETA 9120 – Participant Form, ETA 9121 – Community Service Assignment Form, ETA 9122 – Exit Form, and ETA 9123 – Unsubsidized Employment Form data elements in an Excel document in this information collection request in order to align the format with OMB Control Number 1205-0521. The implementation of this new format will occur when the WIPS and ETA-CMS systems are fully operational. In previous information collection requests, ETA submitted these forms in Word Documents. As explained above, this package will extend the existing data elements in Word to allow for the closeout of PY17 and transition into the new ETA-CMS during PY18 (Sections 500-518 of OAA-2016 and 20 CFR 641.500-740 and 879(b)). Once the WIPS and ETA-CMS are fully operational, all further data collection will take place in the CMS system using OMB Control Number 1205-0521.

Additionally, for PY 18, ETA plans to use an updated version of the currently approved layout of ETA 9120, ETA 9121, ETA 9122, and ETA 9123 to collect data from grantees. The updated versions of these forms for SPARQ (SCSEP legacy system) data collection during PY 2018 will include the data elements approved under Control No. 1205-0521 that are required to report the new performance measures required by OAA-2016. ETA plans to submit a non-material change for control number 1205-0040 shortly after the completion of the ETA-CMS deployment, which will incorporate all of the performance-related data approved in control number 1205-0521. This non-material change will allow grantees to use system-generated printouts of the approved ETA-CMS system data elements when collecting data in areas where access to technology are limited or unavailable (i.e. rural communities).

Table 1 below provides a cross reference for each topic ETA must collect information on, the collection instruments, and the related statutes and regulations.

Table 1: Collection Instruments

	COLLECTION	LEGISLATIV	REGULATORY
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	<i>INFORMATION</i>	<i>E CITATIONS OAA-2016</i>	<i>CITATIONS</i>
State Plan	Four-Year SCSEP State Plan Requirements Guidance	Section 503(a)	641.300-370
	Two-Year (Modification) SCSEP State Plan Requirement Guidance	Section 503(a)	641.340-370
	SCSEP Equitable Distribution (ETA 8705 – System-generated)	Sections 507(a), -(b), and 508	641.325(a), 360, 365, and 879(c)
Equitable Distribution Report	(ETA 8705, ETA 8705A, and ETA 8705B)	Sections 507(a), - (b) and 508	641.360, 365, and 879(c)
Grant Planning and Allotment Requirements	Planning Instructions and Allotments for SCSEP	Sections 502, 506 and 515	641.400-495
Performance Accountability	Quarterly performance Reporting (QPR) (System-generated)	Sections 513 and 514	641.700-740, 879(b),(d), (e), and (h)
	SCSEP Data Collection Elements (ETA 9120 – Participant Form, ETA 9121 – Community Service Assignment Form, ETA 9122 – Exit Form, and ETA 9123 – Unsubsidized Employment Form)	Sections 500-518	641.500-740 and 879(b)
	Goal Negotiation Calendar Template (ETA 9180A)	Section 513(a) (2)(C)	641.700-740
	SCSEP Grantee Sub-State Data Template (ETA 9180B)	Section 513(a) (2)(E)	641.700-740
	Customer Satisfaction Surveys (ETA 9124A, ETA 9124B, and ETA 9124C)	Sections 513(b) (1)(E)	641.700-740
	Discretionary Transfer Instructions for SCSEP (ETA 9181)	Sections 507(a)- (b), and 508	641.325(a), 360, and 365
	SCSEP Release and Authorization	Section 516	Preamble of 20 CFR 641 Final Rule 2010

	Photography (ETA 9182A)		Background Section
	SCSEP Consent for Use and Publication of Information (ETA 9182B)	Section 516	Preamble of 20 CFR 641 Final Rule 2010 Background Section

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.*

State Plan

The Governor, or the highest government official, in each State submits the State Plan as an independent document or as a part of the WIOA Combined State Plan. The purpose of the State Plan is to outline a 4 year strategy for the statewide provision of community service employment and other authorized activities for eligible individuals under the SCSEP. The State Plan describes the planning and implementation process for SCSEP services in the state, taking into account the relative distribution of eligible individuals and employment opportunities within the State. Any changes to the strategy must be described in the two-year modification to the State Plan. Among the agencies involved in preparing the State Plan with the State Grantee are WIOA agencies, Area Agencies on Aging, community service agencies, and the SCSEP national grantees operating in that state. Grantees use this information to strategically plan for SCSEP service delivery throughout the state and to integrate SCSEP services with WIOA and other federal, state, and local programs. ETA uses the information to ensure that grantees are making progress towards their plans and to offer technical assistance towards reaching the plan’s goals when necessary. ETA solicits this information through the **Four-Year SCSEP State Plan Requirements Guidance TEGL** and the **Two-Year (Modification) SCSEP State Plan Requirement Guidance TEGL**. The SCSEP stand-alone State Plan is covered by this control number and the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan is covered by OMB Control Number 1205-0522.

ETA Form 8705 is a system-generated report that compares the allocation of SCSEP positions based on equitable distribution as determined by Census data to the current enrollment of participants by the grantees. The differences between the official allocation of positions and the actual enrollment of participants form the basis for much of the State Plan activity. Grantees use the data in this report to prepare their State Plans, and ETA uses the data to determine how close grantees are to achieving equitable distribution and to provide technical assistance when necessary. This form is also used by grantees to prepare Equitable Distribution Reports, as described below.

Equitable Distribution Report

The Equitable Distribution Report has been used by the program for over 20 years. It was substantially revised in PY 2015. The report consists of system-generated data and provides grantees the number of allocated positions by county, the number of current enrollments by county, and the variance between the two. The Equitable Distribution

Report (**ETA Form 8705**) remains a requirement under section 508 of OAA-2016, which calls for States, in conjunction with national grantees operating in the state, to submit a report that details an equitable allocation of SCSEP resources within the state based on county-by-county data showing the number of SCSEP-eligible persons in the population from the most recent U.S. Census. The report shows whether areas are serviced equitably rather than being underserved or overserved. Grantees use **ETA Forms 8705A** and **8705B** to provide their analysis of any variance and a narrative of the actions the State grantee and the national grantees will take to come into compliance with the equitable distribution requirements. ETA reviews the information grantees provide to determine whether they need technical assistance in meeting equitable distribution requirements.

Grant Planning and Allotment Requirements

The Planning Instructions and Allotments guidance, through the publication of the **Planning Instructions and Allotments for SCSEP TEGL**, are used by ETA to collect budget information and narrative (SF-424, SF-424A), program narrative, programmatic assurances, optional special requests, and policies and procedures for programmatic compliance) necessary for ETA to issue SCSEP grantees their annual program funding.

Performance Accountability

The **QPR** (system-generated) supports SCSEP's performance accountability. ETA uses the QPR information to manage the program and to report program results to the public and to Congress. If the Department determines that the State failed to meet the expected levels of performance (reported on the final QPR) for three consecutive years, the Department will require the State to conduct a competition and will reallocate the grantee's funding to another entity OAA § 513(d)(3)(B)(iii). National grantees that failed to meet the expected levels of performance for four consecutive years will not be allowed to compete in the subsequent grant competition, but may compete in the next grant competition after that subsequent competition (OAA § 513(d)(2)(B)(iii)). When necessary, ETA uses this information to begin such proceedings. ETA also reviews QPRs to determine whether grantees need technical assistance in meeting their agreed upon performance goals.

ETA will use the existing **Customer Satisfaction Surveys (ETA 9124A, ETA 9124B, and ETA 9124C)** to gather required information on the new performance measure, "Indicators of effectiveness in serving employers, host agencies, and participants." ETA has conducted these surveys nationwide since 2004. The survey approach allows the program flexibility and, at the same time, captures common customer satisfaction information that can be aggregated and compared among national and state grantees. The measure is created with a small set of core questions that form the American Customer Satisfaction Index (ACSI). The index is created by combining scores from three specific questions that address different dimensions of customers' experience. Additional questions that do not affect the assessment of grantee performance are included to allow grantees to effectively manage the program. ETA will use the information to calculate grantees' performance on this measure, and grantee scores will be reported on their final QPRs.

Grantees may negotiate their proposed performance goals with the Department. This negotiation takes place prior to the beginning of the new program year. ETA uses the **Goal**

Negotiation Calendar Template (ETA 9180A) to schedule such negotiations. Grantees use the **SCSEP Grantee Sub-State Data Template (ETA 9180B)** to provide ETA with supporting information for their proposed goals and ETA reviews the information when negotiating goals with the grantee.

ETA will use **ETA-CMS Elements** (ETA 9120 – Participant Form, ETA 9121 – Community Service Assignment Form, ETA 9122 – Exit Form, and ETA 9123 – Unsubsidized Employment Form) to record participant-level information about SCSEP program participants and to measure grantees’ progress toward OAA-2016 requirements. Grantees use this information to generate reports and support the day-to-day management of their grants.

Grantees use the **Discretionary Transfer Instructions for SCSEP (ETA 9181)** to request transfers of SCSEP participants from one grantee to another at the request of the participant for personal reasons or at the initiative of the grantee for administrative reasons. ETA uses the information to review and fulfill such requests.

The release, authorization and consent information collection in the **SCSEP Release and Authorization Photography (ETA 9182A)** and **SCSEP Consent for Use and Publication of Information (ETA 9182B)** forms are used by ETA to gain consent from SCSEP grantees and participants to promote and publish information regarding the program’s success. This information collection is only requested in unique circumstances.

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.*

ETA uses an automatic system to collect both programmatic and performance information. Grantees are required to submit data electronically in order to reduce costs and burden. To accommodate the collection of information on the SCSEP performance measures and service delivery, grantees have used an internet-based system since PY 2005. The system is continually refined and revised to comply with new legal and programmatic requirements and to provide case management functionality requested by the grantees. ETA-CMS is expected to be operational during quarter two of PY 2018 (or shortly after). Furthermore, as described above, the SCSEP Equitable Distribution Report includes a system-generated component, and the quarterly and final QPRs are system-generated.

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’s data collection efforts leverage information so that no information is duplicated. For example, the equitable distribution information collected in ETA Form 8705 will be

used to develop State Plan updates. The information is system-generated and is leveraged in other reports. See additional information below.

State Plan and Equitable Distribution Report

The OAA-2016 permits grantees to submit a WIOA Combined State Plan; therefore, the Department is able to reduce duplication since SCSEP is part of a consolidated information collection known as the “Required Elements for Submission of the Unified or Combined State Plan and Plan Modifications under the Workforce Innovation and Opportunity Act.” This consolidated information collection (OMB Control Number 1205-0522) replaces program-specific State plan collections for each of the core programs. Providing a WIOA Combined State Plan response will count as a response for any existing program-specific State plan information collection requirements for any optional program or program activities that a State includes in its WIOA Combined State Plan. As described above, the information collected in the system-generated SCSEP Equitable Distribution Form 8705 is used by grantees in both the State Plan and for the Equitable Distribution Report. The other Equitable Distribution Report forms require individual responses by grantees and cannot be acquired through other sources.

Grant Planning and Allotment Requirements

20 CFR 641 holds the Department accountable for the information collection required for the annual grant and allotment awards. The Planning Instructions and Allotments guidance information collection ensures adherence to these requirements, and there is no substitute for this information.

Performance Accountability and Services to Participants

ETA is in the process of modernizing two ETA-wide systems (performance and case management) as part of its effort to minimize duplicative systems used across ETA programs for Performance Accountability activities. SCSEP’s current stand-alone performance system will be phased out as the new ETA-wide systems (ETA-CMS and WIPS) are deployed. The information collected includes participant personal characteristics, community service and employment activities, dates of program activities, post-program follow-up information, etc. The ETA-CMS Elements collect information at the participant level that is not available through any other means. ETA uses the participant level data to generate aggregate data via the QPR, which is provided to the public and helps ensure performance accountability. Forms 9181, 9182A, and 9182B all solicit information for unique cases. Due to the specificity required, this information cannot be obtained through other sources.

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

Although small entities (generally non-profits) are active partners in the provision of community services and act as host agencies to program participants, these entities are not actively engaged in the reporting process, which is handled primarily by the grantee. The

only exception is that some small employers and host agencies are chosen to receive customer satisfaction surveys. Response to these surveys is, however, voluntary.

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 OAA-2016 requires the Department to implement corrective action if grantees' performance falls below specified negotiated levels. Reports and plans referenced under this OMB control number allow the Department to monitor each grantee's progress toward its performance goals and provide timely assistance to the grantees if needed. Without accurate performance data, the Department could not measure the success of its grantees and could not ensure that program participants are served by high-quality grants.

If the collection of information under Table 1 (State Plan, Grant Planning and Allotment Requirements, Performance Accountability, Services to Participants, and Equitable Distribution Report) is conducted less frequently, it would be contrary to the program requirements mandated by the OAA-2016. In addition, the lack or reduction of these information collections would impact the responsibility and trust that have been placed on the Department by Congress and the public.

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 March 21, 2018 (83 FR 12408).

Comments were received from the public and ETA revised its instruments to reflect public inputs. A full summary of the public comment and ETA's responses are included in Attachment A: SCSEP ICR 60-Day Comments and Responses.

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 any payments or gifts to respondents.

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

For the State Plan and Planning Instructions and Allotments Guidance, ETA is not requesting individual-level data. For Services to Participants and Performance Accountability (including the customer satisfaction surveys), individual responses are private. Other data provided by customers are kept private to the extent provided under existing statutory authorities, except when privacy is waived. ETA follows Department-wide data security measures for all data systems.

In TEGL 39-11 (which provides guidance related to Federal laws and policies related to data privacy, security, and protecting personal identifiable, and sensitive information), ETA states that grantees must not extract information from data supplied by ETA for any purpose not stated in the grant agreement. ETA recommends that grantees collect Personally Identifiable Information (PII) for grant purposes only, and that before grantees collect PII, or other sensitive information, they ask program participants to sign a release form. ETA also plans to advise grantees that their participant release forms should include an explanation of how and for what purposes the data collected will be used.

A key concern is the protection of participant social security numbers. Grantees must collect Social Security Numbers (SSN) in order to properly pay participants for their community service work in host agencies. (The SSN is also required for matching participant Unemployment Insurance wages in order to verify employment outcomes for the required performance measures.) However, when the participant record is first created, ETA's system converts the SSN to a unique participant identification number. Thereafter, the SSN is no longer visible and is never transmitted in either direction when the record is updated. Only the participant identification number is used to identify a record. The transmittal of participant files to DOL is always protected by secure encryption. Any information that is shared or made public is aggregated by grantee and does not reveal personal information on individuals.

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.

Questions of a sensitive nature include self-identification of a disability. Applicants are informed that Equal Employment Opportunity information – gender, ethnicity, race, and disability – is voluntary and that the refusal to provide it will have no effect on any decision to provide services to them. The collection of this information is similar to other programs (such as WIOA) and complies with the requirements of the Americans with Disabilities Act. Moreover, disability status impacts eligibility under OAA-2016, and one of the mandated performance measures requires grantees to attempt to collect information about participants’ barriers to employment. When disability is used as an optional factor in eligibility, it must be documented; however, applicants are not required to claim a disability when applying for the program.

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

As program appropriations decrease and state and local minimum wages increase, grantees serve fewer participants, which, in turn decreases burden hours. In addition, the changes to the employment outcome measures mandated by OAA-2106 reduce the amount of information that must be collected for the core performance measures and eliminate the additional performance measures. As a result of the 2016 national grantee competition, SCSEP now operates with 76 grantees, four more than in prior years.

The following table can be used as a guide to calculate the total burden of an information collection.

Table 2: Senior Community Service Employment Program 2018 Burden Hour Estimates

Activity	Number of Respondents (Note 1)	Frequency	Total Estimated Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
SCSEP Participant - ETA 9120 (Note 2)	76	Ongoing	56,285	0.2	11,257	\$21.89	\$246,416

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Community Service Assignment - ETA 9121 (Note 2)	76	Ongoing	99,330	0.1	9,933	\$21.89	\$217,433
Unsubsidized Employment - ETA 9122 (Note 2)	76	Ongoing	9,000	0.1	900	\$21.89	\$19,701
Exit - ETA 9123 (Note 2)	76	Ongoing	22,235	0.05	1,112	\$21.89	\$24,336
SCSEP Equitable Distribution (ETA 8705 – System-generated) (Note 3)	76	Bi-annually	152	.08	12	\$21.89	\$263
State Equitable Distribution Report Form – ETA-8705A	51	Annually	51	3	153	\$21.89	\$3,349
Grantee Equitable Distribution Report Form-ETA 8705B	71	Annually	71	3	213	\$21.89	\$4,663
Participant Customer Satisfaction – ETA-9124A (Note 3)	11,800	Annually	11,800	0.16	1,888	\$21.89	\$41,328
Host Agency Customer Satisfaction – ETA-9124B (Note 3)	8,500	Annually	8,500	0.16	1,360	\$21.89	\$29,770
Employer Customer Satisfaction – ETA-9124C (Note 3)	500	Annually	500	0.16	80	\$21.89	\$1,751
Four-Year State Plan (and 2 year State Plan modifications)	56	Bi-annually	112	24	2,688	\$21.89	\$58,840
Planning Instructions and Allotments for SCSEP	76	Annual	76	16	1,216	\$21.89	\$26,618

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<i>(Note 4)</i>							
SCSEP Negotiation Calendar Template–ETA-9180A <i>(Note 5)</i>	15	Annual	15	0.08	1	\$21.89	\$26
SCSEP Grantee Sub-State Data Template–ETA-9180B <i>(Note 5)</i>	15	Annual	15	3	45	\$21.89	\$985
SCSEP Transfer Instructions–ETA-9181 <i>(Note 6)</i>	76	Ongoing	150	1	150	\$21.89	\$3,284
SCSEP Release and Authorization to Photograph–ETA-9182A <i>(Note 7)</i>	20	Ongoing	20	0.17	3	\$21.89	\$74
SCSEP Consent for Use & Publication of Info–ETA-9181B <i>(Note 7)</i>	20	Ongoing	20	0.17	3	\$21.89	\$74
Unduplicated Totals <i>(Note 8)</i>	////	////	208,332	////	31,014	////	\$678,912

* All hourly rates used to calculate the Senior Community Service Employment Program’s burden cost are the mean hourly earnings in the Bureau of Labor Statistics’ 21-1099 Community and Social Service Specialists, All Other, we refer to the State Government (OES Designation) industry; for the 21-0000 Community and Social Service Occupations (Major Group) (May 2016, Occupational Employment Statistics, U.S. Bureau of Labor Statistics, <https://www.bls.gov/oes/current/oes211099.htm>).

Note 1 Respondents: The total estimated number of respondents is calculated based on 76 state and national grants for most reports; a combined 20,800 customer satisfaction survey respondents involving 75 grantees; and 50 states and Puerto Rico, for the equitable distribution reports.

Note 2 QPR: As part of the Department’s effort to streamline program performance reporting and comply with the requirement of implementing the SCSEP performance measures no later than December 31, 2017, ETA moved the primary information collection requirements relating to performance from OMB Control Number 1205-0040 (primarily ETA 9120, 9121, 9122, and 9123) to OMB Control Number 1205-0521. In addition, in PY

2018, ETA plans to move the remaining information collections captured in ETA data elements 9120, 9121, 9122, and 9123 to OMB Control Number 1205-0521. This information collection request (ICR) will extend the existing data elements to allow for the closeout of PY17 and transition into the new ETA-CMS around September 30, 2018.

SCSEP plans to retain this OMB control number for State Plan guidance, Grant Planning and Allotment Requirements, and the Equitable Distribution Report information collection requirements.

Note 3 Customer Satisfaction Surveys: The use of ACSI remains unchanged for the new performance measure, indicators of effectiveness in serving employers, host agencies, and project participants, at least while ETA completes its pilot test of a similar measure limited to effectiveness in serving employers. However, ETA is reviewing its approach to this measure as a part of SCSEP's alignment with WIOA indicators of performance and may revise the measure in whole or in part. During this interim period while the current customer satisfaction surveys remain in effect, ETA will confer with grantees and stakeholders about possible changes to the survey questions and administration and will investigate a possible replacement for the ACSI. See Part B.

Note 4 Planning Instructions and Allotments for SCSEP: ETA is requesting approval for the SCSEP Planning Instructions and Allotments. SCSEP funds are allocated by a formula set forth in Section 506 of the OAA-2016, and operate on a PY basis, from July 1 through the following June 30. Awards are renewed annually for all grants. ETA releases grant planning guidance each year to provide funding and authorized position amounts and to assist SCSEP grantees in preparing their budgets and document submissions for the annual OAA Title V appropriation. The Planning Instructions and Allotments for SCSEP include information, such as program narrative, optional program special request, and programmatic assurances, budget narrative, that is required to receive funding. This annual plan applies to all 76 SCSEP grants.

Note 5 SCSEP Goal Negotiation: ETA is requesting approval for the SCSEP Goal Negotiation Template forms. The OAA permits grantees to negotiate proposed goals with the Department. This negotiation process takes place prior to the beginning of the new program year and is scheduled with the grantees for two-weeks. This information collection seeks approval to use SCSEP's Goal Negotiation Calendar, which ETA uses to schedule such negotiations, and the template that grantees use to submit data in support of their proposed goals. The negotiation period is open to all 76 SCSEP grants, who have the option to negotiate goals.

Note 6 SCSEP Transfer Instructions: ETA is requesting approval for the Discretionary Transfer Instructions. This form is used by grantees to request ETA's approval to transfer SCSEP participants from one grantee to another at the request of a participant (for personal reasons), or at the request of the grantee (for administrative reasons). ETA uses the information provided via the form to review and fulfill such requests.

Note 7 SCSEP Release, Authorization and Consent: ETA is requesting approval for the SCSEP Release and Authorization Photography and SCSEP Consent for Use and Publication of Information forms. These forms are used by ETA to gain consent from SCSEP grantees and participants to promote and publish information regarding the program’s successes.

Note 8 Quarterly Narrative Report: ETA has moved the SCSEP Grants Quarterly Narrative Progress Report information collection to OMB Control Number 1205-0448 as part of an effort to align all ETA narrative reporting in the WIOA Joint Quarterly Narrative Progress Report information collection request (ICR). ETA will use the current template under this OMB control number to meet its current reporting requirement for PY17, and plans to use the Joint Quarterly Narrative Progress Report for SCSEP in PY 2018.

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).*

The data collection application does not require any software more advanced than a Windows Operating System. The application is designed to run on any computer with broadband Internet access and Chrome, Mozilla Firefox, Sahara, or other browsers. All grantees and sub-grantees have the equipment necessary to operate the application. Grantees need not incur any additional ongoing costs although there may be some minor costs (covered by grant funds) associated with training grantee staff to use the system. The data collection applications are provided for free to all grantees and sub-grantees. All grantees are required to use these ETA-provided systems.

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.*

Costs to the Federal Government

Report	Federal Review Hours	Average Hourly Wage (Note 9)	Number of Reviews	Total
QPR(Note 10)	3	\$44.28	380	\$50,479

SCSEP Portion of State Strategic Plan and Bi-annual Modifications	5	\$44.28	56	\$12,398
Equitable Distribution Report 8705, 8705A (State Report – 52), and 8705 B (Grantee Report-68)	2	\$44.28	122	\$10,804
Planning Instructions and Allotments for SCSEP	2	\$44.28	76	\$6,731
SCSEP Goal Negotiation	4	\$44.28	15	\$2,657
TOTAL:	16	////	649	\$83,069

Note 9 Estimates: The estimates above are based on past experience in reviewing the reports but also include judgments on the time needed to analyze the performance results and review new requirements. They are based entirely on estimated staff time needed to review the reports. The average hourly cost for Federal staff members who review reports is based on the OPM Washington DC Locality Pay Schedule, 2018 Federal employee (GS-12, Step 5). In addition to the above ongoing costs, ETA expects to incur contractor costs of \$2.9 million in PY 17 for data specification, maintaining and testing the reporting systems, and providing training and technical support to grantees using the system. These costs have been fully funded through the use of SCSEP recaptured funds.

Note 10 QPR: Four quarterly reports plus the final report for a total of 5 reports reviewed per grantee.

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

As referenced in this information collection, ETA added the Annual Grant Planning and Allotment Requirements guidance TEGL, ETA 9181 (Discretionary Transfer Instructions for SCSEP), ETA 9182A (SCSEP Release and Authorization Photography), and ETA 9182B (SCSEP Consent for Use and Publication of Information) to this control number as a result of SCSEP’s financial, programmatic and reporting accountability. The following are the added burden under control number 1205-0040 (See Table 2 for more detail):

- Planning Instructions and Allotments for SCSEP – number of respondents (76) multiplied by 1 (annually) multiplied by 16 hours equals 1216 annual burden hours;
- SCSEP Negotiation Calendar Template (ETA Form 9180A) – number of respondents (15) multiplied by 1 (annually) multiplied by 5 minutes (.08) equals 1.20 annual burden hours;
- SCSEP Grantee Sub-State Data Template (ETA-9180B) – number of respondents (15) multiplied by 1 (annually) multiplied by 3 hours equals 45 annual burden hours;

- SCSEP Transfer Instructions (ETA-9181) – Total estimated annual responses (150) per number of respondents multiplied by 1 hour equals 150 annual burden hours;
- SCSEP Release and Authorization to Photograph (ETA-9182A) – Total estimated annual responses (20) per number of respondents multiplied by 10 minutes (.17) equals 3.4 annual burden hours; and
- SCSEP Consent for Use & Publication of Info (ETA-9181B) – Total estimated annual responses (20) per number of respondents multiplied by 10 minutes (.17) equals 3.4 annual 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.*

ETA publishes the annual performance report (ETA 5140) and the Goal Negotiation Results of all grantees, as required by statute. At the completion of ETA's systems modernization, the agency plans to update SCSEP's annual performance report instrument. SCSEP also makes its data available on http://www.doleta.gov/Seniors/html_docs/GranteePerf.cfm in response to a SCSEP-specific requirement in the OAA and in response to OMB's Open Government Directive, which has the goals of publishing government information on-line, improving the quality of government information, creating and institutionalizing a culture of open government, and creating an enabling policy framework for open government.

The State Plan is publicly presented for comment by individual states in accordance with each state's comment process. Such processes may include publication in local newspapers or on the state's website. The quarterly and annual performance reports use no complex calculations. Results are generally tabulated as sums, averages, or percentage rates.

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 control number and the expiration date.

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.