

**SUPPORTING STATEMENT**  
**Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting**  
**OMB Control No. 1205-0526**

**A. Justification.**

WIOA Joint Participant Individual Record Layout (PIRL) | WIOA Annual Statewide Performance Report Template | WIOA Annual Local Area Performance Report Template | WIOA Annual Statewide/Local Performance Report Specifications | WIOA Eligible Training Provider (ETP) Performance Report Specifications and WIOA Eligible Training Provider (ETP) Performance Report Definitions | Annual Statewide Performance Report Narrative

The Department of Labor (DOL) seeks approval of this information collection request (ICR) under the clearance process for “common forms.” The Department of Education (ED) (the two Departments to be jointly referred to as the “Departments”) actively participated in the development of this ICR, and is a signatory to the “WIOA Common Performance Reporting” information collection, which details the requirements for WIOA Statewide performance reporting.

This ICR is an update to an existing ICR, Workforce Innovation and Opportunity Act Common Performance Reporting (OMB Control No. 1205-0526), approved June 30, 2016. The initial ICR contained the following: WIOA Statewide Performance Report Template and WIOA Local Performance Report Template (ETA-9169); WIOA Joint Participant Individual Record Layout (PIRL) and WIOA Annual Statewide/Local Performance Report Specifications (ETA-9170); and WIOA Eligible Training Provider (ETP) Performance Report Specifications and WIOA Eligible Training Provider (ETP) Performance Report Definitions (ETP-9171).

This ICR revises and updates certain aspects of those existing information collection instruments. The Departments are adding new information collection requirements for WIOA Statewide performance reporting. Specifically, the Departments are adding: (1) additional data elements related to training program information to the ETP Performance Report (ETA-9171) and (2) a new Annual Statewide Performance Report Narrative. This additional information would be helpful in the implementation and evaluation of the workforce development covered programs. In the future, through subsequent guidance, the Departments may ask respondents to provide information such as descriptions of promising program practices, employer metrics, sector strategies, state evaluations, and rapid response activities.

Also, a few non-substantive adjustments have been made to the WIOA Annual Statewide Performance Report and Local Area Performance Report Template specifications (ETA-9169), and to the WIOA Joint PIRL (ETA-9170). Adjustments such as clarifications to specifications, data elements, and aligning both of the forms with published guidance and policy. The periods

of reporting annual and quarterly document, uploaded under the file name “Periods for Reporting - Annual and Quarterly FINAL” in the most recently approved version of the ICR, has been merged to be included in the 9169 as two separate tabs, one for annual reporting, and the second for quarterly reporting. The Reginfo.gov data base includes both a final version of the instruments as well as a supplemental document that has a tab (Revision History) identifying each of the changes.

As stated in the preamble to the Joint WIOA Final Rule,<sup>1</sup> the Departments intend to implement a uniform, national customer satisfaction survey, applicable to both participants and reportable individuals. While this survey will not be tied to accountability provisions, and the survey results will not be factored into determinations of sanctions, customer satisfaction will be a factor considered in the certification of one-stop centers. The information collected through the national customer satisfaction survey will also be useful to State administrators, local operators, and training providers. The specifics of the contents and format of this information collection instrument will be the subject of a separate ICR at a later time that will undergo public comment and a request for approval from the Office of Management and Budget (OMB) under the requirements of the Paperwork Reduction Act.

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.*

Section 116 of WIOA (29 U.S.C. § 3141) requires States and Local Areas that operate the six core programs of the workforce development system to comply with common performance accountability requirements for those programs, which are: the Adult, Dislocated Worker, and Youth programs (title I, administered by DOL); the Wagner-Peyser Act program (title III, administered by DOL); the Adult Education and Family Literacy Act (AEFLA) program (title II, administered by ED); and the Vocational Rehabilitation (VR) program (title IV, administered by ED). As such, States and Local Areas that operate core programs must submit common performance data to demonstrate that specified performance levels are achieved. States and Local Areas will report the common performance data through this ICR.

In addition, and in accordance with WIOA section 122(b)(2), training providers that are eligible to receive funds from Adult and Dislocated Worker programs authorized under title I of WIOA (also known as “eligible training providers” or ETPs) must report data on outcomes achieved under those programs to the State(s) in which they are listed on the

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<sup>1</sup> On August 19, 2016 (81 FR 55792), the Departments issued a Joint Final Rule to implement jointly administered activities authorized by title I of WIOA. The final rule became effective on October 18, 2016.

State ETP list. States then report the information submitted by ETPs to DOL. The information collection requirements applicable to ETPs are contained in this ICR.

Section 116(d)(1) of WIOA mandates that the Secretaries of Labor and Education develop a template for performance reports to be used by States, local boards, and ETPs for reporting on outcomes achieved by participants in the six core programs. Corresponding joint regulations for these data collection requirements, including which primary performance indicators apply for each core program, have been issued by the Departments. See 81 FR 55792 (Aug. 19, 2016). The final regulations became effective on October 18, 2016. These joint performance regulations can be found at: (1) 20 CFR part 677 (which covers the Adult and Dislocated Worker programs (20 CFR part 680), the Youth program (20 CFR part 681), and the Wagner-Peyser Act program (20 CFR part 652)); (2) 34 CFR part 463, Subpart I (which covers the AEFLA program); and (3) 34 CFR part 361, Subpart E (which covers the VR program).

The data collection instruments covered in this ICR, are necessary to meet the requirements of section 116 of WIOA. These information collection instruments were developed jointly by the Departments, and include: (1) the Joint Participant Individual Record Layout (PIRL), which provides a standardized set of data elements, definitions, and reporting instructions for use by States and local entities administering WIOA core programs (ETA-9170); (2) the Statewide Performance Report Template, to be used for the reporting of data by State entities that administer WIOA core programs (ETA-9169); (3) the Local Area Performance Report Template, to be used for the reporting of data by local entities that administer WIOA core programs (ETA-9169); (4) the ETP Performance Report specifications and definitions, to be used for the reporting of data by eligible providers of training services under title I Adult and Dislocated Worker programs (ETA-9171); and (5) the Annual Statewide Performance Report Narrative, a new information collection requirement to be used for providing information on the status and progress of workforce development program performance.

The remainder of this section provides additional details on each of the information collection instruments covered in this ICR.

#### WIOA PARTICIPANT INDIVIDUAL RECORD LAYOUT (PIRL) (ETA-9170)

The PIRL provides a standardized set of data elements, definitions, and reporting instructions that will be used to describe the characteristics, activities, and outcomes of WIOA participants. States and Local Areas will be required to collect participant information that corresponds with the data elements and descriptions delineated within the PIRL (this is a part of their recordkeeping requirements). Once collected, this information will then be aggregated according to the conditions outlined in the **WIOA Annual Statewide Performance Report Specifications**, which details the common data elements and technical

specifications necessary for calculation of the State and Local Area Performance Report elements that will be used in reporting across all core programs. Once aggregated, the outcomes will then be displayed according to the framework that is the **WIOA Annual Statewide Performance Report Template/WIOA Annual Local Area Performance Report Template**.

#### WIOA ANNUAL STATEWIDE PERFORMANCE REPORT TEMPLATE (ETA-9169)

Required annual data for the core programs include information related to the six primary performance indicators, participant counts and costs, and barriers to employment as described below. The following data must be included in the Statewide Performance Report and will be reported on an individual or aggregate basis, depending on the program to which they pertain, as described later in this section.

#### Primary Indicators of Performance for Core Programs

For WIOA core programs, States must report the results of primary indicators of performance set forth at section 116(b)(2)(A)(i) of WIOA:

1. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program.<sup>2</sup>
2. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program.<sup>3</sup>
3. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program.
4. The percentage of program participants who obtained a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within one year after exit from the program. For those program participants who obtained a secondary school diploma or its recognized equivalent, the participant must also have obtained or retained employment or be in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.
5. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or

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<sup>2</sup> For the title I Youth program, the percentage of WIOA youth participants includes those who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the program (WIOA section 116 (b)(2)(A)(ii)(I)).

<sup>3</sup> For the title I Youth program, the percentage of WIOA youth participants includes those who are in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the program (WIOA section 116 (b)(2)(A)(ii)(II)).

employment and who are achieving measurable skill gains toward such a credential or employment.

6. The indicator(s) of effectiveness in serving employers.

All of the above primary indicators of performance also will be displayed as a disaggregate value based on the barriers to employment incorporated into the definition of an “individual with a barrier to employment,” as set forth in WIOA section 3(24). The specific population disaggregation is described below in Numbers 22 through 35.

#### Participant Counts and Cost Information

Under section 116(d)(2) of WIOA, the WIOA Annual Statewide Performance Report also must include the following data:

7. Information specifying the levels of performance achieved with respect to the primary indicators of performance described in WIOA section 116(b)(2)(A) for each of the programs described in WIOA section 116(b)(3)(A)(ii) and the State adjusted levels of performance with respect to such indicators for each program.
8. Information specifying the levels of performance achieved with respect to the primary indicators of performance described in WIOA section 116(b)(2)(A) for each of the programs described in WIOA section 116(b)(3)(A)(ii) with respect to individuals with barriers to employment, disaggregated by each subpopulation of such individuals, and by race, ethnicity, sex, and age.
9. The total number of participants served by each of the core programs.
10. The number of participants who received career services during the most recent program year and the three preceding program years.
11. The number of participants who received training services during the most recent program year and the three preceding program years.
12. The amount of funds spent on career services.
13. The amount of funds spent on training services.
14. The number of participants who exited from career services, during the most recent program year and the three preceding program years.
15. The number of participants who exited from training services during the most recent program year and the three preceding program years.
16. The average cost per participant of those participants who received career services during the most recent program year and the three preceding program years.

17. The average cost per participant of those participants who received training services during the most recent program year and the three preceding program years.
18. The percentage of participants in a program authorized under WIOA title I who received training services and obtained unsubsidized employment in a field related to the training received.
19. The number of participants who are enrolled in more than one of the core programs.
20. The number of participants with barriers to employment served by each of the core programs, disaggregated by each subpopulation of such participants.
21. The percentage of the State's annual allotment under section 132(b) that the State spent on administrative costs.

### Barriers to Employment

Data must be collected in a manner so that the results may be disaggregated by the "Barriers to Employment," as described in section 3(24) of WIOA, for both number of participants served and performance on primary indicators, and then further disaggregated by age, race and ethnicity, and sex. Under section 3(24) of WIOA, an "individual with a barrier to employment" includes:

22. Displaced homemakers.
23. Low-income individuals.
24. Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166 of WIOA.
25. Individuals with disabilities, including youth who are individuals with disabilities.
26. Older individuals (55+).
27. Ex-offenders.
28. Homeless individuals (as defined in section 41403(6) of the Violence against Women Act of 1994 (42 U.S.C. 14043e-2(6)), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))).
29. Youth who are in or have aged out of the foster care system.
30. Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers.
31. Eligible migrant and seasonal farmworkers, as defined in section 167(i) of WIOA.
32. Individuals within two years of exhausting lifetime eligibility under TANF (part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.)).

33. Single parents (including single pregnant women).
34. Long-term unemployed individuals (27 or more consecutive weeks).
35. Such other groups as the Governor involved determines to have barriers to employment.

To collect these data:

1. **The Department of Education's Rehabilitation Services Administration (RSA) in the Office of Special Education and Rehabilitative Services (OSERS) has an OMB-approved information collection instrument used to collect participant-level WIOA core program data on a quarterly basis from the 80 VR agencies: the Case Service Report (RSA-911), OMB Control Number 1820-0508.** RSA will analyze and aggregate these data for the purpose of computing the performance accountability measures and other figures required in the Statewide Performance Report.
2. **The Department of Education's Office of Career, Technical, and Adult Education (OCTAE) has an OMB-approved information collection instrument used to obtain aggregate data annually from States, using a set of reporting tables developed by ED (*Implementation Guidelines: Measures and Methods for the National Reporting System for Adult Education*, OMB Control Number 1830-0027).** For the purposes of the AEFLA program, States are required to complete and submit the WIOA Annual Statewide Performance Report template, in addition to the aggregate data tables that States are required to submit to OCTAE under OMB Control Number 1830-0027.
3. **DOL has an additional ICR to collect and report on data elements not specified in this information collection.** See ETA WIOA Performance Accountability, Information, and Reporting System (OMB Control Number 1205-0521.) This other information collection will take the place of several other currently existing ICRs, such as: Workforce Investment Act (WIA) Management Information and Reporting System (OMB Control Number 1205-0420), Wagner-Peyser Labor Exchange Reporting System (LERS) (OMB Control Number 1205-0240), YouthBuild Reporting System (OMB Control Number 1205-0464), Reporting and Performance Standards for WIA Indian and Native American Programs (OMB Control Number 1205-0422), Reporting and Performance Standards System for Migrant and Seasonal Farmworker Programs Under title I, Section 167 of WIA (OMB Control Number 1205-0425), and Trade Act Participant Report (OMB Control Number 1205-0392).

WIOA ANNUAL LOCAL AREA PERFORMANCE REPORT TEMPLATE (ETA-9169)

The WIOA Annual Local Area Performance Report Template is a subset of the WIOA Annual Statewide Performance Report Template which, under section 116(d)(3) of WIOA, requires

the collection of the same aforementioned costs, counts, and primary indicators for title I Adult, Dislocated Worker, and Youth programs. Similarly, the counts and primary indicators must be disaggregated by the above listed barriers to employment.

#### WIOA ETP PERFORMANCE REPORT (Definitions-Only) (ETA-9171)

Section 116(d)(4) of WIOA, regarding contents of ETP Reports, mandates the collection of specific information for each program of study for each eligible provider of training services under title I Adult and Dislocated Worker programs. DOL allows States to use individual training accounts (ITAs) for out-of-school youth WIOA participants ages 16 to 24 (20 CFR 681.550). Therefore, for purposes of the annual ETP Performance Report, WIOA out-of-school youth participating in a program of study using an ITA must be reported like a WIOA adult in all student and WIOA participant categories. Likewise, references to the WIOA Adult Program for purposes of reporting on the ETP Performance Report include out-of-school youth participating in a program of study using an ITA.

This data collection covers definitions for title I ETP performance and corresponding tabulations (see ETA-9171), which should allow States to begin their own data collection from the ETPs on the State list. The update adds some additional defined data elements to the list, and also adds data element numbers and code values for each defined data element. This ICR seeks approval for the definitions of ETP terms and corresponding calculations of WIOA performance measures as they relate to the ETP Report (See ETA-9171) and the method for calculating the total number of individuals served in a program of study.

States will submit their ETP data through the Department of Labor's Workforce Integrated Performance System in either a comma separated value format (.csv) or a comma delimited text file (.txt). No other file formats are currently supported by the system and will result in a data reject if submitted.

#### Primary Performance Indicators for the WIOA ETP Performance Report

The ETP Performance Report, applicable only to the title I Adult and Dislocated Worker programs, must report the results of the four primary indicators of performance identified below (Number 1 through Number 4), along with the total number of individuals who exit from the program of study (Number 5), with respect to all individuals who exited a program of study and all individuals who completed a program of study, including individuals in the program of study who are not WIOA participants. A program of study approved on the ETP list is synonymous with a "program of training services," as defined at 20 CFR 680.420. A program of training services is one or more courses or classes, or a structured regimen that



provides the training services at 20 CFR 680.200, which reflects the list of services set forth in section 134(c)(3)(D) of WIOA, and leads to the outcomes described at 20 CFR 680.420. Listed below are the statutory requirements that mandate the collection of data through the ETP Performance Report (see WIOA section 116(d)(4)). Definitions for the elements that must be collected in order to meet these reporting requirements are included in ETA--9171 of the ICR.

1. The percentage of individuals who are in unsubsidized employment during the second quarter after exit from the program of study.
2. The percentage of individuals who are in unsubsidized employment during the fourth quarter after exit from the program of study.
3. The median earnings of individuals in the program of study who are in unsubsidized employment during the second quarter after exit.
4. The percentage of individuals who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within one year after exit from the program. For those individuals who obtained a secondary school diploma or its recognized equivalent, the individual must also have obtained or retained employment or be in an education or training program leading to a recognized postsecondary credential within 1 year after exit from the program.
5. The total number of individuals who exit from the program of study.

The ETP Performance Report must report the results of the above indicators with respect to all WIOA participants in the program of study.

#### Participant Counts and Cost Information

6. The number of participants exiting from the program of study (or the equivalent).
7. The total number of participants who received training services through each of the Adult program and the Dislocated Worker program authorized under chapter 3 of subtitle B, disaggregated by the type of entity that provided the training, during the most recent program year and the three preceding program years.
8. The total number of participants who exited from training services, disaggregated by the type of entity that provided the training, during the most recent program year and the three preceding program years.
9. The average cost per participant for the participants who received training services, disaggregated by the type of entity that provided the training, during the most recent program year and the three preceding program years.

10. The number of individuals with barriers to employment served by each of the Adult program and the Dislocated Worker program authorized under chapter 3 of subtitle B, disaggregated by each subpopulation of such individuals, and by race and ethnicity, sex, and age.

### Barriers to Employment

Data on the WIOA ETP Performance Report must be collected in a manner so that the results for WIOA participants may be disaggregated by the barriers to employment, as described in the definition of an “individual with a barrier to employment,” in section 3(24) of WIOA, for WIOA participants served as well as disaggregated by age, race and ethnicity, and sex. *See complete list of individuals with barriers to employment outlined in the previous section (WIOA Annual Statewide Performance Report Template).*

### Additional Training Program Information

In this ICR, the Departments are adding additional data elements related to training program information to the ETP Performance Report. This additional information will facilitate the provision of more useful information to assist participants in choosing employment and training activities, and in choosing ETPs. Under WIOA section 185(a)(2), recipients of WIOA title I funds must submit such records and reports “as the Secretary of Labor may require regarding the performance of programs and activities carried out under [WIOA title I].” Definitions and instructions with respect to these new data elements can be found in the revised ETA-9171. The following list is a brief explanation of the new data elements:

1. Name of the training program.
2. A short description of the training program, which may include other course prerequisites (e.g., driver’s license or work experience), learning outcomes, program accreditation, full-time/part-time, books/technology needed, and related careers.
3. A short description of training provider, which may include accreditation and program offerings/specialties.
4. The full address of the training provider's main location, including city, State, and 5-digit zip code.
5. The URL of the program-specific webpage for training seekers to find more information on program.
6. An estimate of the program's out-of-pocket cost of tuition and required fees for non-WIOA participants.

7. An estimate of the program's out-of-pocket cost of books and supplies for non-WIOA participants.
8. The length of the program in clock/contact hours.
9. The length of the program in weeks.
10. Information on educational prerequisites for program enrollment (e.g., no educational requirements, program requires a Bachelor's degree).
11. Information on the format of the program (e.g., in person, online).
12. Specific name of certificate, certification, license, or degree participants can receive (e.g., Certified Welding Inspector [CWI]).
13. List of all States with which the State has reciprocal agreements. (To be completed by States.)
14. Average earnings of individuals in the program of study who are in unsubsidized employment during the second quarter after exit.
15. Average earnings of individuals in the program of study who are in unsubsidized employment during the fourth quarter after exit.
16. Up to three occupations (as O\*NET-SOC codes) for which the program prepares students.

#### ANNUAL STATEWIDE PERFORMANCE REPORT NARRATIVE

The Departments also are adding a new information collection requirement to this ICR: the Annual Statewide Performance Report Narrative. As part of this new requirement, States must submit separately an Annual Statewide Performance Report Narrative, for titles I and III, which must be limited to no more than 25 pages. Other core partner programs are required to participate in the development of the Report Narrative as appropriate. The specific items to be described by States in the Performance Report Narrative, and the submission method, will be requested through subsequent Departmental guidance, and may include topics such as:

- A discussion of "best practices," "lessons learned," and "success stories" that focuses on serving individuals with barriers to employment, employers, and communities, including information based on the state's evaluation and related research projects. This discussion may include individuals such as out-of-school youth, low-income adults, dislocated workers, individuals who are basic skills deficient, individuals with disabilities, veterans, any other individuals with barriers to employment, and other populations the State may wish to discuss.

- Discussion of progress made in achieving the State's strategic vision and goals, as described in the State's Unified or Combined State Plan, for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency.
- Discussion of State progress in implementing sector strategies and career pathways. Discussion may include: business engagement strategies, work-based learning and training, including work experiences for youth and adults, transitional jobs, and incumbent worker training strategies and policies in the State.
- A listing of the waivers for which the State has received approval, information on how the waivers have changed the activities of the State and Local Areas, and how activities carried out under the waivers have directly or indirectly affected State and Local Area performance outcomes.
- A discussion of the activities funded by the State's discretionary (15 percent) funds. In this section of the narrative, States may describe activities undertaken in whole or in part with their discretionary funds, and how those activities directly or indirectly affect performance.
- Employer Metrics (including the metrics the State is piloting, as well as any other metrics the State is using).
- Brief descriptions of: (a) current or planned evaluation and related research projects, (b) efforts to coordinate the development of such projects with local boards and other state agencies, including those for core programs, (c) completed evaluation and related reports and how they were made accessible to the public electronically, and (d) efforts to provide data, survey responses and timely site visits for Federal evaluations.
- A description of any National Dislocated Worker Grants awarded to or within the State, and how those funds are coordinated with State rapid response activities, dislocated worker programs, and disaster/emergency management activities, as applicable.
- Description of rapid response activities and layoff aversion (include data on number of companies served, individuals served, strategies for linking to American Job Centers, etc.)
- Description of any technical assistance needs or policy challenges that most effect use of the workforce system.
- Description of the State's approach to assessing customer satisfaction, results achieved, and how the State has used the outcomes of customer satisfaction assessment to improve service delivery.

In their Performance Report Narrative, States must address the items requested through subsequent Departmental guidance. The Department of Labor will submit the additional

guidance for OMB approval through the non-material change process. States, however, will not be limited to the requested items and may want to include additional information about their programs. Thus, States have flexibility in the contents of the Annual Statewide Performance Report Narrative, as long as they address the requested items and stay within the 25-page limit established for the Narrative requirement.

Under WIOA section 185(a)(2), recipients of WIOA title I funds must submit such records and reports “as the Secretary of Labor may require regarding the performance of programs and activities carried out under [WIOA title I].” The information in narrative format will be helpful for the Departments to evaluate, in both quantitative and qualitative approaches, the status and progress of workforce development program performance.

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.*

Section 116(d) of WIOA requires States, Local Boards, and ETPs to submit the data required in the information collection instruments covered in this ICR. The Departments will use the data collected to assess the effectiveness of WIOA’s core programs and to monitor and analyze the performance of their grantees. If States do not adequately meet the adjusted level of performance as described in 20 CFR 677.180, they are subject to the five percent sanction discussed in WIOA section 116(f).

This data collection permits the Departments to evaluate program effectiveness, monitor compliance with statutory requirements, and analyze participant activity, while complying with OMB efforts to streamline Federal performance reporting.

Data collected in the WIOA Annual Statewide Performance Report, WIOA Annual Local Area Performance Report, and WIOA ETP Performance Report (or the data associated) will be made accessible to the public through an annual report published at [www.doleta.gov/performance](http://www.doleta.gov/performance) (the Adult, Dislocated Worker, and Youth programs under title I and the Wagner-Peyser Act program under title III); <https://rsa.ed.gov/> (the State VR Services program under title IV); and <http://www.ed.gov/about/offices/list/ovae/resource/index.html> (the AEFLA program under title II). This performance information also will be distributed to workers and job seekers throughout the WIOA system, including through online formats as are consistent with statute. All reports will comply with the requirements of section 508 of the Rehabilitation Act, which requires electronic and information technology to be accessible to people with disabilities.

It should also be noted that the above report displays will be subject to a data suppression methodology where aggregated values below a certain threshold within a given geographic

entity will not be displayed. Specifics on this, including the level at which aggregated values cannot be displayed, will be disseminated jointly by the Departments in subsequent guidance.

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.*

States are encouraged to collect participant data through electronic means. The majority of the information collection instruments covered in this ICR (e.g., WIOA Annual Statewide Performance Reports, individual record data) may be submitted electronically through portals established by the Departments. For the VR program, RSA will develop the WIOA Annual Statewide Performance Reports based upon the information VR agencies submit via the RSA-911 data collection.

DOL continues to implement a new online system for States and grantees to submit their performance report data. This new system, the Workforce Integrated Performance System (WIPS), became available for submissions of the first reporting quarter of data in Program Year 2016 (by October 1, 2016). Implementation of the integrated performance reporting system will take place in several phases. The system capabilities will expand over the course of the phased implementation. Program performance reporting implementation also will be phased in as the system capabilities are fully realized. During Phase 1 of the Performance System Implementation Plan, WIPS will accept data uploads of comma separated values (csv) files and comma delimited text files from States and grantees on the data elements specific to each program. The Enterprise Data Reporting and Validation System (EDRVS) will continue to accept legacy layout files until the reporting requirements for participating programs are closed out. DOL will continue to provide training and technical assistance as States and grantees adjust to submitting performance data using a new system. For additional information on implementation of WIPS, refer to DOL's Training and Employment Notice No. 08-16, "Implementation of an Integrated Performance Reporting System for Multiple Employment and Training Administration (ETA) and Veterans' Employment and Training Services (VETS) Administered Programs" (August 24, 2016).<sup>4</sup>

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.*

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<sup>4</sup> Available at DOL's website at [https://wdr.doleta.gov/directives/attach/TEN/TEN\\_08-16.pdf](https://wdr.doleta.gov/directives/attach/TEN/TEN_08-16.pdf), last accessed on December 9, 2016.

The information covered in this ICR would be collected in addition to other program-specific collections under approved OMB Control Numbers/Report titles described in more detail later in this section. The information collection covered in this ICR incorporates only those data elements that are common to all core programs and required by section 116 of WIOA. The Departments collaborated to develop common definitions across programs, to the extent applicable, in order to further reduce the chances of duplicative reporting. The WIOA ETP Report is not duplicative of any existing information collection.

The DOL notes that this ICR will take the place of several other currently existing information collections, as described below.

Information collection burdens associated with this ICR represent only the burden associated with reporting the common performance data elements by the core programs and information collections that will be continued and are currently approved under various control numbers as outlined later in this section. This ICR does not reflect any burden associated with existing data collections that will continue separate and distinct and that are currently approved under other control numbers.

**The currently-approved program-specific data reporting that will continue, as applicable, in addition to the common data ICR discussed herein, for the core programs include:**

- OMB Control Number 1205-0420, Workforce Investment Act (WIA) Management Information and Reporting System. (This information collection will be in use simultaneously for some time until all WIA reporting requirements have ended.)
- OMB Control Number 1205-0240, Labor Exchange Reporting System. (This package will be in use simultaneously for some time until all Labor Exchange/Employment Service reporting requirements have ended.)
- OMB Control Number 1830-0027, Measures and Methods for the National Reporting System for Adult Education.
- OMB Control Number 1820-0508, Case Service Report (RSA-911).

The Departments anticipate that some, but not all, of the above information collections may be phased out or modified, as appropriate, as the WIOA performance measures are fully implemented.

WIOA requirements that are addressed in this ICR also may overlap with currently approved information collections under program-specific ICRs previously mentioned. However, it is the intent of the Departments to revise existing ICRs or create new ICRs to supplement this information collection, as appropriate, to reduce duplication for the States. For example, as described in response to section A1, specifically the part that describes collecting data, of

this supporting statement above, RSA has modified its existing Case Service Report (RSA-911) for the purpose of collecting individual-level WIOA core program data from the 80 VR program grantees on a quarterly basis. RSA uses no other method for collecting the data required under section 116 of WIOA and there exists no overlap with any other data collection instrument used by RSA.

Performance requirements of WIA will continue to apply to the title I Adult, Dislocated Worker, and Youth programs and the title III Wagner-Peyser program although the performance requirements of WIOA are in effect. States must submit a closeout report for WIA title I in program year 2018. For this reason, the separate packages that address the requirements of WIA and WIOA must be simultaneously active for at least several months to collect the required data. The WIOA burden has been calculated to reflect the estimate of monetary costs and staff hours necessary to operate the WIOA Performance Management, Information and Reporting System once full implementation has taken place. We acknowledge that this results in a temporary but technical overstatement of the combined WIA and WIOA burdens while the new system is phased in and the previous system comes to a close. Throughout the next several years the burden will decrease as overlapping requirements in the WIA Management Information and Reporting System (OMB Control Number 1205-0420) and Labor Exchange Reporting System (OMB Control Number 1205-0240) are discontinued.

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

Although grantees must secure the necessary data from all sub-recipients, as applicable, to incorporate into grantee-required reporting formats, this information collection does not have a significant impact on small entities.

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 collect or report the required performance data less frequently than annually, would violate WIOA. Such failure could impact a State's receipt of Federal funds under WIOA, and/or be a determining factor for a financial sanction on the State pursuant to section 116(f) of WIOA. Moreover, such failure could impede the Departments' efforts to ensure compliance with Federal performance requirements, thereby affecting the Departments' ability to safeguard the Federal interest.



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 ICR implicates no special circumstances.

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.*

The Departments engaged the public through a *Federal Register* notice, published on January 19, 2017 at 82 FR 6651; the regulatory comment period closed on March 20, 2017.

Following the 60-day comment period, the Departments received 19 comments in response to the *Federal Register* notice. 2 comments were duplicates, and not included. Responses were submitted by State and local workforce agencies, Workforce Investment Boards, One-Stop Career Centers, and State Associations of Workforce Investment Boards. A summary of the 17 comments received and the Department's responses can be found in the *Summary of 60-Day Federal Register Notice (FRN) Comments and Responses* document, located in the comment section of ROCIS. Full comments are available at <https://www.regulations.gov/docket?D=ETA-2017-0001>. All responses reflect the agreement of DOL and ED.

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

There are no payments or gifts to the respondents.

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

This ICR does not contain assurances of confidentiality, as States are the respondents. This collection of information will not collect personally identifiable information (PII) such as birthdates and social security numbers (SSNs); however, this ICR identifies the data elements to be collected under RSA-911, which does collect PII, to which the Privacy Act applies, as identified below.

In the RSA-911, the SSN is used for the following:

1. Record control purposes to generate unduplicated data reports;
2. To enable the RSA SSA Data Exchange in accordance with section 131 of the Rehabilitation Act of 1973, as amended by title IV of WIOA;
3. To facilitate the VR agency's ability to obtain UI wage data information required under WIOA.

This information is being collected under authority of the Privacy Act, 5 U.S.C. § 311. To reference the System of Records Notice (18-16-02) for the RSA-911 data collection under 1820-0505, which was published in the Federal Register April 8, 2004; please access via this link: <http://www.ed.gov/notices/pai/pai-18-16-02.pdf>.

The Departments will not accept Social Security information reported by programs under titles I, II, and III, unless collection and reporting of SSNs is specifically noted and required under the individual program.

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.*

There are no sensitive questions included in the information collections covered in this ICR.

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

**Summary:**

The apportionment of burden between the Departments is discussed later in this section; however, it may be useful to consider the combined burden States and participants will

undertake. For purposes of data entry into the reginfo.gov database, this ICR requests only burden for DOL. Due to system limitation, the burden will be apportioned for data entry purposes by each agency claiming a portion of the total burden and responses; these total burden and responses will reflect the total time burden once the two agencies have completed their actions.

For purposes of this ICR, the Governor of a State will report information on an annual basis. The Departments recognize that similar information may be reported to each program on a more frequent basis. Those separate ICRs will claim the burden for program specific reporting. Time burden for each response includes underlying recordkeeping and the filing of each report.

The total hourly burden for this collection is 9,863,065 hours annually with 19,113,711 unduplicated respondents and 38,216,056 responses. As explained elsewhere in this ICR, the DOL share of this burden is 8,325,136 hours, based on the fact that approximately 84 percent of the burden under the collections is borne by DOL programs. Each Department will claim its burden by claiming a share of the responses, in order to have totals align; thus, DOL is claiming 33,018,447 responses for purposes of this submission. The ED requests will be 5,197,609 responses and 1,537,929 burden hours.

#### **Apportionment Detail:**

The annual burden for the information collection of the common performance accountability data is calculated across core programs based on the number of program participants, the time it takes each respondent to complete and submit its report, and the costs incurred by each program to complete the data collection and report submission process. In administering the WIOA core programs, States will collect standardized data elements using this common control number for all core programs, *i.e.*, WIOA Adult, Dislocated Workers, and Youth; Wagner-Peyser; AEFLA; and VR programs. The WIOA Annual Local Area Performance Reports for title I programs are populated based on the information provided within a given State's WIOA Annual Statewide Performance Report Template, using the exact same data elements and reporting format, and filtered by the Local Area in question. As such, the Local Area Performance Report incurs no additional collection burden. The burdens for the ETP Report and the Annual Statewide Performance Report Narrative are included as a separate set of tables within this burden estimate.

#### **a. WIOA Participant Individual Record Layout (PIRL) (ETA-9170)**

Participants who avail themselves of WIOA funded educational programs and services must provide information about themselves to training providers or State agencies. State agencies must collect this information, according to these recordkeeping and reporting requirements over the course of a year and annually provide it to either DOL or ED. The

burden for reporting the information to ED is accounted for in OMB Control Number 1820-0508. The burden for reporting the information to DOL is accounted for in Section 12.b of this document (“WIOA Annual Statewide Performance Report”) as all of the information from the DOL sponsored PIRL electronic system is compiled and sent to DOL by the States as part of the annual Statewide and Local Performance Report.

**Table 1: WIOA Participant Third-Party Disclosure - Annualized Burden Hour Estimate**

<b>PROGRAM</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Total Number of Responses</b>	<b>Burden per Response (in hours)</b>	<b>Total Respondent Burden Hours</b>
	<i>A</i>	<i>B</i>	<i>C = A x B</i>	<i>D</i>	<i>E = C x D</i>
<b>Adult, Dislocated Worker and Youth (DOL/ETA) ETA-9170</b>	1,835,799	1	1,835,799	0.25	458,950
<b>Wagner-Peyser (DOL/ETA) ETA-9170</b>	14,667,639	1	14,667,639	0.25	3,666,910
<b>Adult Education (Education) ETA-9170</b>	1,598,736	1	1,598,736	0.25	399,684
<b>Vocational Rehabilitation (Education) ETA-9170</b>	1,000,000	1	1,000,000	0.25	250,000
<b>Unduplicated TOTALS</b>	<b>19,102,174</b>	<b>1</b>	<b>19,102,174</b>	<b>0.25</b>	<b>4,775,544</b>

The annual burden hours were determined based on the estimated number of annual participant responses per program (the total estimated number of annual responses) and the average number of minutes necessary to collect the required data for each person’s individual record (minutes per record). For example, by multiplying the Wagner-Peyser Act program’s total estimated number of annual responses (14,667,639) by their minutes per record (15 minutes or 0.25 hours) and dividing the product by the 60 minutes that make up an hour, an annual burden of 3,666,910 hours is calculated.

**Table 2: WIOA Participant Statewide Recordkeeping - Annualized Burden Hour Estimate**

<b>PROGRAM</b>	<b>Number of Respondents</b> <i>A</i>	<b>Number of Responses per Respondent</b> <i>B</i>	<b>Total Number of Responses</b> <i>C = A x B</i>	<b>Burden per Response (in hours)</b> <i>D</i>	<b>Total Respondent Burden Hours</b> <i>E = C x D</i>
<b>Adult, Dislocated Worker and Youth (DOL/ETA) ETA-9170</b>	57	32,207	1,835,799	0.25	458,950
<b>Wagner-Peyser (DOL/ETA) ETA-9170</b>	57	257,327	14,667,639	0.25	3,666,910
<b>Adult Education (Education) ETA-9170</b>	57	28,048	1,598,736	0.33	527,583
<b>Vocational Rehabilitation (Education) ETA-9170</b>	80	12,500	1,000,000	0.36	360,000
<b>TOTALS</b>	<b>251</b>	<b>Varies</b>	<b>19,102,174</b>	<b>Varies</b>	<b>5,013,443</b>

**Table 3: WIOA Participant Third-Party Disclosure and Statewide Recordkeeping – Annualized Cost Burden Estimate**

<b>PROGRAM</b>	<b>Total Respondent Burden Hours</b> A	<b>Hourly Wage Rate<sup>c, d</sup></b> B	<b>Total Respondent Burden Cost</b> C = A x B
<b>Participant Third-Party Disclosures</b>	4,775,544 <sup>a</sup>	\$7.25	\$34,622,694
<b>Statewide Recordkeeping of Participants Information</b>	5,013,443 <sup>b</sup>	\$36.48	\$182,890,401
<b>TOTAL</b>	<b>0</b>	<b>Varies</b>	<b>\$217,513,095</b>

<sup>a</sup> Estimates obtained from Table 1, Column E (Unduplicated Totals).

<sup>b</sup> Estimates obtained from Table 2, Column E (Unduplicated Totals).

<sup>c</sup> Participants' time, for the purposes of the PRA, is costed out at the Federal minimum wage.

<sup>d</sup> For Statewide recordkeeping, average hourly wage rate for social workers obtained from the following data source: U.S. Department of Labor, Bureau of Labor Statistics (BLS); May 2015 National Industry-Specific Occupational Employment and Wage Estimates; NAICS 999200 - State Government, excluding schools and hospitals (OES Designation); Social Workers (Occupation Code 21-1020); Mean Hourly Wage. The average hourly wage rate was adjusted for inflation (using a factor of 1.036 based on Employment Cost Indices (ECI) developed by BLS) and to include benefits (using a multiplier of 1.57 included in the currently-approved ICR Supporting Statement).

#### **b. WIOA Annual Statewide Performance Report (ETA-9169)**

States are required to report on participation in WIOA funded programs annually. There are six programs affected by this requirement. Four of the programs are administered by DOL, and two are administered by ED. However, WIOA requires that both Departments report common information. The ETA-9169, WIOA Statewide and Local Performance Report Template, is used by both departments.

As described in response to section A1, specifically the part that describes collecting data, of this supporting statement<sub>above</sub>, RSA will prepare the Annual Statewide Performance Report for the VR program using the quarterly data VR agencies submit through the program's Case Service Report (RSA-911) (OMB Control Number 1820-0508). To ensure its accuracy, RSA will send a preliminary report to the VR agencies for their review and feedback. The burden for this process is accounted for in Table 4.

**Table 4: WIOA Annual Statewide Performance Report - Annualized Burden Hour Estimate Reporting**

<b>PROGRAM</b>	<b>Number of Entities Reporting to the Governor</b> <i>A</i>	<b>Number of Responses per Respondent (average number of program participants per State)</b> <i>B</i>	<b>Total Number of Responses</b> <i>C = A x B</i>	<b>Burden per Response (in hours)</b> <i>D</i>	<b>Total Respondent Burden Hours</b> <i>E = C x D</i>
<b>Adult, Dislocated Worker and Youth (DOL/ETA) ETA-9169</b>	57	1	57	4	228
<b>Wagner-Peyser (DOL/ETA) ETA-9169</b>	57	1	57	4	228
<b>Adult Education (Education) ETA-9169</b>	57	1	57	6	342
<b>Vocational Rehabilitation (Education) ETA-9169</b>	80	1	80	4	320
<b>Unduplicated TOTALS</b>	<b>251<sup>a</sup></b>	<b>1</b>	<b>251</b>	<b>Varies</b>	<b>1,118</b>

<sup>a</sup> The total annual number of unique respondents (251) is based on the sum of the following numbers:

- 52 States (as defined in WIOA Sec. 3(56)); each for ETA, ETP and Adult Education service providers - 156 unique respondents).
- 5 outlying areas (as defined in WIOA Sec. 3(45)); each for ETA, ETP and Adult Education service providers - 15 unique respondents).
- 80 State agencies (specific to Vocational Rehabilitation).

The annual burden hours were determined based on the estimated number of annual participant responses per program (the total estimated number of annual responses) and the average number of hours necessary to collect the required data. For example, by multiplying the Adult, Dislocated Worker and Youth programs' total estimated number of annual responses (57) by the burden hours per response (4 hours), an annual burden of 228 hours is calculated.

**Table 5: WIOA Annual Statewide Performance Report - Annualized Burden Cost Estimate**

<b>PROGRAM</b>	<b>Total Respondent Burden Hours<sup>a</sup></b> A	<b>Hourly Wage Rate</b> B	<b>Total Respondent Burden Cost</b> C = A x B
<b>Adult, Dislocated Worker and Youth (DOL/ETA) ETA-9169</b>	228	\$36.48 <sup>b</sup>	\$8,317
<b>Wagner-Peyser (DOL/ETA) ETA-9169</b>	228	\$36.48 <sup>b</sup>	\$8,317
<b>Adult Education (Education) ETA-9169</b>	342	\$36.48 <sup>b</sup>	\$12,476
<b>Vocational Rehabilitation (Education) ETA-9169</b>	320	\$47.53 <sup>c</sup>	\$15,210
<b>TOTAL</b>	<b>1,118</b>	<b>Varies</b>	<b>\$44,320</b>



<sup>a</sup> Estimates obtained from Table 4, Column E.

<sup>b</sup> Based on average hourly wage rate for social workers obtained from the following data source: BLS; May 2015 National Industry-Specific Occupational Employment and Wage Estimates; NAICS 999200 - State Government, excluding schools and hospitals (OES Designation); Social Workers (Occupation Code 21-1020); Mean Hourly Wage. The average hourly wage rate was adjusted for inflation (using a factor of 1.036 based on ECI developed by BLS) and to include benefits (using a multiplier of 1.57 included in the currently-approved ICR Supporting Statement).

<sup>c</sup> Based on average hourly wage rate for management analyst obtained from the following data source: BLS; May 2015 National Industry-Specific Occupational Employment and Wage Estimates; NAICS 999200 - State Government, excluding schools and hospitals (OES Designation); Management Analysts (Occupation Code 13-1111); Mean Hourly Wage. The average hourly wage rate was adjusted for inflation (using a factor of 1.036 based on ECI developed by BLS) and to include benefits (using a multiplier of 1.57 included in the currently-approved ICR Supporting Statement).

### c. WIOA ETP Performance Report (ETA-9171)

Training providers are required to collect data from participants based on the definitions in ETA-9171, Eligible Training Provider Definitions.

**Table 6: WIOA ETP Performance Report – Annualized Hour Burden Estimate – Recordkeeping**

<b>DATA ELEMENTS</b>	<b>Number of Respondents</b> <i>A</i>	<b>Number of Responses per Respondent</b> <i>B</i>	<b>Total Number of Responses</b> <i>C = A x B</i>	<b>Burden per Respondent (in hours)</b> <i>D</i>	<b>Total Respondent Burden Hours</b> <i>E = C x D</i>
<b>Primary Performance Indicators (DOL/ETA) ETA-9171</b>	11,400	1	11,400	6	68,400
<b>Additional Training Program Information (DOL/ETA) ETA-9171</b>	11,400	1	11,400	0.25	2,850
<b>Unduplicated TOTALS</b>	<b>11,400</b>	<b>1</b>	<b>11,400</b>	<b>Varies</b>	<b>71,250</b>

The annual burden hours for ETP recordkeeping were determined based on the estimated number of training providers (the total estimated number of annual responses) and the average number of hours necessary to compile the required data. The total estimated

number of annual responses was determined based on an estimated 200 training providers per State across 57 States and outlying areas. The annual hour burden is determined by multiplying the ETP annual participant responses (11,400) by the corresponding burden per response (6 hours or 0.25 hours). The resulting annual burden is estimated to be 71,250 hours (68,400 hours + 2,850 hours).

**Table 7: WIOA ETP Performance Report – Annualized Cost Burden Estimate**

<b>DATA ELEMENTS</b>	<b>Total Respondent Burden Hours A</b>	<b>Hourly Wage Rate<sup>a</sup> B</b>	<b>Total Respondent Burden Cost C = A x B</b>
<b>Primary Performance Indicators (DOL/ETA) ETA-9171</b>	68,400	\$59.08	\$4,041,072
<b>Additional Training Program Information (DOL/ETA) ETA-9171</b>	2,850	\$59.08	\$168,378
<b>TOTAL</b>	<b>71,250</b>	<b>\$59.08</b>	<b>\$4,209,450</b>

<sup>a</sup> Based on average hourly wage rate for database administrators obtained from the following data source: BLS; May 2015 National Industry-Specific Occupational Employment and Wage Estimates; NAICS 999300 - Local Government, excluding schools and hospitals (OES Designation); Database Administrators (Occupation Code 15-1141); Mean Hourly Wage. The average hourly wage rate was adjusted for inflation (using a factor of 1.036 based on ECI developed by BLS) and to include benefits (using a multiplier of 1.57 included in the currently-approved ICR Supporting Statement).

**d. Annual Statewide Performance Report Narrative**

States must submit an Annual Statewide Performance Report Narrative, which must be limited to 25 pages. Information in the Report Narrative will be helpful for the Departments to evaluate, in both a quantitative and qualitative way, the status and progress of workforce development program performance.

**Table 8: Annual Statewide Performance Report Narrative – Annualized Burden Hour Estimate Reporting**

<b>INFORMATION COLLECTION</b>	<b>Number of Entities Reporting to the Governor</b>	<b>Number of Responses per Respondent</b>	<b>Total Number of Responses</b>	<b>Burden per Response (in hours)</b>	<b>Total Respondent Burden Hours</b>
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	A	B	$C = A \times B$	D	$E = C \times D$
<b>Report Narrative (DOL/ETA)</b>	57	1	57	30	1,710

The annual burden hours were determined based on the estimated number of annual participant responses and the average number of hours necessary to develop and submit the Report Narrative. For example, by multiplying the total estimated number of annual responses (57) by the burden hours per response (30 hours), an annual burden of 1,710 hours is calculated.

**Table 9: Annual Statewide Performance Report Narrative – Annualized Burden Cost Estimate**

<b>INFORMATION COLLECTION</b>	<b>Total Respondent Burden Hours<sup>a</sup></b> A	<b>Hourly Wage Rate</b> B	<b>Total Respondent Burden Cost</b> C = A x B
<b>Report Narrative (DOL/ETA)</b>	1,710	\$36.48 <sup>b</sup>	\$62,381

<sup>a</sup> Estimates obtained from Table 8, Column E.

<sup>b</sup> Based on average hourly wage rate for social workers obtained from the following data source: BLS; May 2015 National Industry-Specific Occupational Employment and Wage Estimates; NAICS 999200 - State Government, excluding schools and hospitals (OES Designation); Social Workers (Occupation Code 21-1020); Mean Hourly Wage. The average hourly wage rate was adjusted for inflation (using a factor of 1.036 based on ECI developed by BLS) and to include benefits (using a multiplier of 1.57 included in the currently-approved ICR Supporting Statement).

The total number of burden hours is divided between reporting and recordkeeping as shown in Table 10.

**Table 10: Allocation of Burden among the Departments for Information Collections Covered in this ICR**

	<u>Total</u>	<u>DOL Portion</u>	<u>ED Portion</u>
Total Hourly Burden	9,863,065	8,325,136	1,537,929
<i>Reporting</i>	2,828	2,166	662
<i>Recordkeeping</i>	5,084,693	4,197,110	887,583
<i>Third-party Disclosure</i>	4,775,544	4,125,860	649,684
Total Unduplicated Respondents	19,113,711	16,514,952	2,598,873
Total Responses	38,216,056	33,018,447	5,197,609

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

**Table 11: Comprehensive Burden Analysis for All Information Collections Covered in this ICR<sup>a</sup>**

Information Collection	Program(s)	Number of Respondents A	Responses per Year B	Total Responses C = A x B	Average Hours per Response D	Annual Burden Hours E = C x D	Average Hourly Wage F	Time Value G = E x F
<b>PIRL - Participant Reporting (ETA-9170)<sup>b</sup></b>	Adult, Dislocated Worker and Youth Wagner-Peyser Adult Education Vocational Rehabilitation	19,102,174	1	19,102,174	0.25	4,775,544	\$7.25	\$34,622,694
<b>PIRL - Participant Recordkeeping (ETA-9170)<sup>c</sup></b>	Adult, Dislocated Worker and Youth	57	32,207	1,835,799	0.25	458,950	\$36.48	\$16,742,496
	Wagner-Peyser	57	257,327	14,667,639	0.25	3,666,910	\$36.48	\$133,768,877
	Adult Education	57	28,048	1,598,736	0.33	527,583	\$36.48	\$19,246,228
	Vocational Rehabilitation	80	12,500	1,000,000	0.36	360,000	\$36.48	\$13,132,800
<b>Statewide Performance Report (ETA-9169)<sup>d</sup></b>	Adult, Dislocated Worker and Youth	57	1	57	4	228	\$36.48	\$8,317
	Wagner-Peyser	57	1	57	4	228	\$36.48	\$8,317
	Adult Education	57	1	57	6	342	\$36.48	\$12,476
	Vocational Rehabilitation	80	1	80	4	320	\$47.53	\$15,210
<b>ETP Performance Report (ETA-9171)<sup>e</sup></b>	Eligible Training Provider (ETP)	11,400	1	11,400	6.25	71,250	\$59.08	\$4,209,450
<b>Report Narrative<sup>f</sup></b>	Adult, Dislocated Worker and Youth Wagner-Peyser Adult Education Vocational Rehabilitation	57	1	57	30	1,710	\$36.48	\$62,381
<b>Unduplicated Totals</b>		<b>19,113,711<sup>g</sup></b>	<b>Varies</b>	<b>38,216,056</b>	<b>Varies</b>	<b>9,863,065</b>	<b>Varies</b>	<b>\$221,829,246</b>

<sup>a</sup> Estimates in table may contain rounding error.

<sup>b</sup> Estimates obtained from Tables 1 and 3.

<sup>c</sup> Estimates obtained from Tables 2 and 3.

<sup>d</sup> Estimates obtained from Tables 4 and 5.

<sup>e</sup> Estimates obtained from Tables 6 and 7.

<sup>f</sup> Estimates obtained from Tables 8 and 9.

<sup>g</sup> Unduplicated total for number of respondents was obtained using the following calculation: [PIRL - Participant Reporting] + [Number States and Outlying Areas] + [Number State Agencies] + [Number ETPs] = 19,102,174 + 57 + 80 + 11,400 = 19,113,711.

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).*

#### **Summary:**

There also will be associated start-up and maintenance costs for respondents to implement this information collection. These costs include: enhancements to data collection systems to adhere to WIOA requirements, training staff on data collection rules, and for ETA, associated IT cost for transitioning data intake systems to collect exit information in a new method (e.g., data systems must be able to re-open closed cases if a participant re-enters the program within a given program year). A breakdown of these costs is listed below.

#### **Employment and Training Administration**

For DOL core programs, the total cost of \$11.4 million to respondents is derived from an estimated cost of \$100,000 per each of the 114 respondents using regulatory impact analysis (RIA) source data. This cost to State grantees is primarily to upgrade/revise their management information systems to be able to collect the new data elements required under WIOA, to revise some data elements that may have changed as a result of sharing definitions and input values with ED, and to create a unique identifier that can be tracked over time. Any additional cost associated with data collection and reporting will be incurred at the Federal level to accept the revised format of the data files from each respondent.

#### **Office of Career, Technical, and Adult Education**

Because individual participant records for OCTAE's AEFLA program are collected and maintained at the State level by State agencies responsible for administering and supervising adult education policy, significant enhancements and maintenance of State data systems and staff training will be required under WIOA. OCTAE estimates the annual cost of State data system requirements and staff training for compliance with the new collection and reporting of WIOA performance data at \$350,000. This annual cost is comprised of \$250,000 for data system enhancements, maintenance, and staff training and \$100,000 for the additional data matching and staff training required to collect data and report outcomes for each participant exit. The review of public comments resulted in a decision by the Departments that a participant who has more than one exit during a program year will count as a separate participant for each exit for data collection and outcome reporting under the performance indicators. For such participants, the ICR uses the term "period of participation" to refer to the time between each "date of program entry" and the corresponding "date of program exit" during a program year. Such participants have multiple periods of participation in a given program year. Prior to WIOA, the AEFLA program reported only unduplicated counts of participant outcomes. Making the change to an accountability structure that is based on reporting outcomes for each exit by a participant during a program year represents a significant operational change for OCTAE's AEFLA program and will require a commensurate increase in the associated annual IT, data matching, and training costs for each respondent.

#### **Rehabilitation Services Administration**

All 80 State VR agencies will incur burden for start-up activities associated with modifying

sophistication of their information technology systems, and whether the agency contracts for outside assistance for developing and maintaining their CMS. We estimate that each of the 80 State VR agencies will require computer systems analysts for the task of modifying and reprogramming their CMS. However, because the level of effort for making such changes will vary, the burden estimates for this work by Computer Systems Analysts has been broken down to reflect this complexity. Roughly 30 of the 80 VR agencies use case management and reporting systems purchased from software providers who are responsible for maintaining and updating software. We estimate that each of these 30 VR agencies will require two Computer Systems Analysts to spend 150 hours integrating the software changes into their own State systems, resulting in 300 hours per agency, or a total of 9,000 hours in additional burden for all 30 agencies. Of the remaining 50 VR agencies that do not have agreements with a software provider to maintain and update software, five of these agencies are categorized as large agencies (with more than 5,000 employment outcomes) and 45 of these agencies are categorized as small to medium-sized agencies (with fewer than 1,000 employment outcomes, and between 1,000 and 5,000 employment outcomes, respectively). We estimate the five large agencies will require five computer systems analysts to spend 1,000 hours each to maintain and update agency software (5,000 hours per agency), for a total of 25,000 hours. We estimate the 45 small to medium-sized agencies will require two computer systems analysts to spend 1,000 hours each to maintain and update the software (2,000 hours per agency), for a total of 90,000 hours in order to make the necessary software changes. This results in a total of 115,000 hours for the 50 agencies without outside vendor support to maintain and update their information systems.

Combining this burden with the 9,000 hours for the 30 agencies that we estimate will only have to integrate the software modifications provided through their vendor contract results in a total burden estimate of 124,000 hours for all 80 VR agencies. Prorating these total burden hours at 36 percent results in an estimated total of 44,640 hours. Using an hourly compensation rate of \$57.95 (based on data from the Bureau of Labor Statistics for State employed Computer Systems Analysts)<sup>5</sup>, the prorated estimated cost for all 80 VR agencies is \$2,586,888 (44,640 hours x \$57.95 = \$2,586,888).

In addition to maintaining and updating software, 48 of the 50 VR agencies that do not utilize vendor supplied case management software will incur additional software licensing or user fees. Using an average cost of \$700 per user annually, we estimate a total cost for the approximate 6,600 users in States served by vendor systems of \$4,620,000. However, we estimate that only 20 percent of the increase in such costs, or \$924,000, is related to WIOA requirements. Applying the 36 percent proration factor to this estimated amount, the 48 agencies will incur an additional \$332,640 in licensing or user fees.

WIOA core programs will need access to quarterly State UI wage data in order to efficiently identify exited participants who are employed in the second and fourth full quarters after exit to report on the employment indicators. These agencies also will need access to the State quarterly UI wage data to identify the individual quarterly wages in the second full quarter in order to calculate the median wage indicator. Prior to WIOA, DOL and Adult Education programs obtained quarterly UI wage data on their participants. However, this will be the first time that State VR agencies will be required to obtain and report UI wage data. VR programs will need to contribute a reasonable and proportional share of the costs for the maintenance and use of the State UI wage system and interstate wage information systems, on a per individual, per query, monthly, quarterly or annual basis. For State VR

agencies, the Departments estimated this cost by first multiplying the data query cost for large VR agencies (\$20,000) by the number of large VR agencies (10). We then multiplied the data query cost for medium VR agencies (\$8,000) by the number of medium VR agencies (42). Finally, we multiplied the data query cost for small VR agencies (\$4,000) by the number of small VR agencies (28). We summed the annual data query cost for all VR agencies to obtain a total estimated cost of \$648,000.

**Table 12: Collection of Unemployment Insurance Wage Data**

Size of VR Agency	Number of Affected Entities	Applicable Cost	Total Cost
Large	10	\$20,000	\$200,000
Medium	42	\$8,000	\$336,000
Small	28	\$4,000	\$112,000
<b>TOTAL</b>	<b>80</b>	<b>Varies</b>	<b>\$648,000</b>

State VR agencies will need to purchase data analytic software and other IT tools, including related training to increase their capability to more effectively analyze their program data for the primary indicators of performance and the disaggregation of the performance data by employment barriers. In addition, they will need to the capability to integrate data from UI reporting systems into their case management systems. We estimate that these one-time costs will average \$25,000 for each of the 10 large agencies, \$15,000 for each of the 42 medium-sized agencies, and \$10,000 for each of the 28 small sized agencies. These estimated costs of \$250,000 for large agencies, \$630,000 for medium-size agencies, and \$280,000 for small-sized agencies, sum to a total cost of \$1,160,000 for all 80 VR agencies.

Finally, the 80 VR agencies will be required to train VR Counselors on the new and modified data elements that need to be collected and entered into their case management system. We estimate that each VR agency has an average of 62 VR Counselors and that each VR Counselor will require 8 hours of training. Using an hourly compensation rate of \$39.70 per VR Counselor (based on data from BLS)<sup>6</sup>, the estimated cost for VR Counselors to receive such training is \$1,575,296 for all 80 agencies, or \$19,691 per agency. In addition, we estimate that development of the training materials and methodologies will require one Staff Trainer 8 hours per VR agency. Using the Social and Community Service Manager hourly compensation rate (\$56.80)<sup>7</sup> as a proxy for the Staff Trainer, the estimated cost for development of the training is \$36,352 for all 80 agencies (1 Staff x 8 hours x \$56.80 x 80 agencies = \$36,352). The total estimated cost for development of the training and VR Counselor participation in the training is \$1,611,648 for all 80 VR agencies (\$1,575,296 + \$36,352 = \$1,611,648). Since we are estimating that approximately 36 percent of the

<sup>6</sup> BLS; May 2015 National Occupational Employment and Wage Estimates by Ownership; State government, including schools and hospitals; Counselors (Occupation Code 21-1010); Mean Hourly Wage. Available at <https://www.bls.gov/oes/current/999201.htm#15-0000>, last accessed on December 16, 2016. The average hourly wage rate was adjusted for inflation (using a factor of 1.036 based on ECI developed by BLS) and to include benefits (using a multiplier of 1.57 included in the currently-approved ICR Supporting Statement).

burden is related to joint performance accountability, the estimated total cost associated is \$580,193 ( $\$1,611,648 \times 36\% = \$580,193$ ), or \$7,252 per VR agency ( $\$580,193 / 80 \text{ agencies} = \$7,252$ ).

Summing all of the estimated start-up costs associated with this joint data collection, the cost per VR agency is \$66,347 ( $[\$2,586,888 \text{ for software modifications} + \$332,640 \text{ for additional licensing or user fees} + \$648,000 \text{ for collection of UI wage data} + \$1,160,000 \text{ for purchase of data analytic software and other IT tools} + \$580,193 \text{ for training development}] / 80 \text{ VR agencies}$ ). **The total start-up costs for all 80 State VR agency respondents is estimated to be \$5,307,760 ( $\$66,347 \times 80 \text{ VR agencies} = \$5,307,760$ ).**

**Table 13: Start-up Cost/Maintenance Cost Summary for Joint Performance ICR**

Department - Agency	Respondents (each providing one response per year)	Start-up/ Maintenance Costs (per respondent) <sup>a</sup>	Total Annual Start-up/Maintenance Cost (for all respondents)
DOL - ETA	114	\$100,000	\$11,400,000
ED - OCTAE	57	\$350,000	\$19,950,000
ED - RSA	80	\$66,347	\$5,307,760
<b>TOTAL</b>	<b>251</b>	<b>\$516,347</b>	<b>\$36,657,760<sup>b</sup></b>

<sup>a</sup> Annually over a three-year period. The Departments assume these initial costs also will cover any ongoing operation costs.

14. P

*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.*

Based on previously estimated software development costs for the programs listed below, and considering the changes required by WIOA and the associated regulations, a preliminary estimate of the cost for the development of the software needed to accept these reports for the Departments is \$2,175,711, including:

- \$750,000 for the Adult and Dislocated Worker programs under title I and Wagner-Peyser programs under title III (Employment and Training Administration of the DOL).
  - \$500,000 for the ETP reporting portal.
  - \$750,000 for the AEFLA program under title II (Office of Career, Technical, and Adult Education of the ED).
  - \$175,711 for VR under title IV (RSA of the ED; cost derivation is presented below).
- The contract costs over 3 years average is \$725,237.  $\$2,175,711 / 3 \text{ years} = \$725,237$ . (Costs include loaded wage factor of 1.63.)

VR will develop its software using new staff positions. We estimate that it will take two full-time Data Management Specialist positions, one at GS-13 Step 5 and one at GS-14 Step 5, to complete the necessary database programming requirements. With an hourly wage of \$65.36 for the GS-13 position and \$77.25 for the GS-14 position<sup>8</sup>, the total VR cost for software development is estimated to be \$296,629. Because we are estimating that approximately 36 percent of the burden is related to joint performance accountability, the total attributable to the joint burden is \$106,786. In addition, RSA will need to purchase software that will enable RSA to compile the quarterly data reported by VR agencies into



the Annual Reports required under WIOA. The estimated cost of the needed software is \$68,925.

(1 staff x 2,080 hours x \$65.36 hourly wage = \$135,949.

(1 staff x 2,080 hours x \$77.25 hourly wage = \$160,680.

\$135,949 + \$160,680 = \$296,629 (\$296,629 x 36% towards Joint Performance = \$106,786)

\$106,786 Joint Performance Cost + \$68,925 Software Costs = \$175,711 for RSA.

Based on previous estimates for Federal oversight, it is estimated that, on average, five GS-13s and four GS-14s from each agency will spend 160 hours annually on oversight of each of the three core programs specified above. Assuming hourly pay at the GS-13 Step 5 and GS-14 Step 5 level for the Washington D.C. Metro Area for 2016 is \$81.57 and \$96.38, respectively.<sup>9</sup>

The Federal oversight costs are estimated to result in a total annualized cost of \$380,818.

(5 staff x 3 programs x 160 hours x \$81.57 hourly wage) = \$195,768.

(4 staff x 3 programs x 160 hours x \$96.38 hourly wage) = \$185,050.

Federal annual oversight costs: \$380,818. \$195,768 + \$185,050 = \$380,818.

**Total Annualized Cost to the Federal Government is: \$1,106,055.**

Total annualized costs of the initial development (contract) costs = \$725,237.

Federal oversight costs = \$380,818.

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

Changes to WIOA ETP Performance Report (Definitions-Only) (ETA-9171), WIOA Annual Statewide Performance Report (ETA-9169), and WIOA Joint PIRL (ETA-9170).

In this ICR, the Departments are adding data elements related to training program information to the ETP Performance Report. This additional information is necessary to facilitate the provision of more useful information to assist participants in choosing employment and training activities, and in choosing ETPs. Under WIOA section 185(a)(2), WIOA title I fund recipients must submit such records and reports "as the Secretary of Labor may require regarding the performance of programs and activities carried out under [WIOA title I]." Definitions and instructions with respect to these new data elements can be found in the revised ETA-9171.

Also, a few non-substantive adjustments have been made to the WIOA Annual Statewide Performance Report and Local Area Performance Report Template specifications (ETA-9169), and to the WIOA Joint PIRL (ETA-9170). Adjustments such as clarifications to specifications, data elements, and aligning both of the forms with published guidance and policy were needed. The Reginfo.gov data base includes both a final version of the instruments as well as

Burden hours have not changed as a result of this revision request.

### Annual Statewide Performance Report Narrative

The Departments are adding a new information collection requirement related to the Annual Statewide Performance Report to this ICR. As part of this new requirement, States must submit separately an Annual Statewide Performance Report Narrative, which must be limited to 25 pages. This Narrative is needed to enable the Departments to evaluate, in both a quantitative and qualitative way, the status and progress of workforce development program performance. Under WIOA section 185(a)(2), WIOA title I fund recipients must submit such records and reports “as the Secretary of Labor may require regarding the performance of programs and activities carried out under [WIOA title I].”

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.*

### WIOA ANNUAL STATEWIDE PERFORMANCE REPORT (ETA-9169)

The Annual Report to be provided to Congress and the public via the Departments' websites will be tabulated in a manner that corresponds to section 116(d)(2)(A)-(J) of WIOA:

- A. Information specifying the levels of performance achieved with respect to primary indicators of performance for WIOA Youth, WIOA Adult, WIOA Dislocated Worker, Wagner-Peyser, Adult Education and Family Literacy Act, and the Vocational Rehabilitation programs, and the State adjusted levels of performance with respect to such indicators for each program.
- B. Information specifying the levels of performance achieved with respect to the primary indicators of performance for WIOA Youth, WIOA Adult, WIOA Dislocated Worker, Wagner-Peyser, Adult Education and Family Literacy Act, and the Vocational Rehabilitation programs with respect to individuals with barriers to employment, disaggregated by the following subpopulations: displaced homemakers, low-income individuals, Indians, Alaska Natives, and Native Hawaiians as such terms are defined in section 166 of WIOA, older individuals, low levels of literacy or English proficiency, disability status, homelessness, youth who are in or have aged out of the foster care system, migrant and seasonal farmworkers, single parents (including single pregnant women), ex-offender status, and welfare dependency of such individuals, and disaggregated by race, ethnicity, sex, and age.
- C. The total number of participants served by each core program.
- D. Number of participants who received career services and training services, respectively, during the most recent program year and the three preceding program years and the amount of funds spent on each type of service.
- E. The number of participants who exited from career services and training services, respectively, during the most recent program year and the three preceding program years.

- G. The percentage of participants in a program who received training services and obtained unsubsidized employment in a field related to the training received.
- H. The number of individuals with barriers to employment served by each core program disaggregated by each subpopulation.
- I. The number of participants enrolled in more than one core program.
- J. The percentage of the State's annual allotment under section 132(b) that the State spent on administrative costs.

WIOA ETP PERFORMANCE REPORT (ETA-9171)

Data shall be reported by each eligible provider of training services under section 122 of WIOA, with respect to each program of study, in a manner that is tabulated as described in section 116(d)(4)(A)-(F) of WIOA, summarized below:

- A. Information specifying the levels of performance achieved with respect to the primary indicators at WIOA sec. 116(b)(2)(A)(i)(I)-(IV) and 116(b)(2)(A)(ii)(I)-(III);
- B. The total number of individuals exiting from the program of study (or the equivalent);
- C. The total number of participants who received training services through each of the adult program and the dislocated worker program authorized under chapter 3 of subtitle B of title I of WIOA, disaggregated by the type of entity that provided the training, during the most recent program year and the three preceding program years;
- D. The total number of participants who exited from training services, disaggregated by the type of entity that provided the training, during the most recent program year and the three preceding program years;
- E. The average cost per participant for the participants who received training services, disaggregated by the type of entity that provided the training, during the most recent program year and the three preceding program years; and
- F. The number of individuals with barriers to employment served by each of the adult program and the dislocated worker program authorized under chapter 3 of subtitle B, disaggregated by race and ethnicity, sex, age, and each subpopulation of individuals with barriers to employment.

As specified by WIOA sec. 116(d)(6), States must make the above ETP-related data publicly available (including by electronic means), in an easily understandable format (see 20 CFR 680.400(b)).

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."*

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

This information collection does not employ statistical methods.