SUPPORTING STATEMENT
TAA STATE SURVEY
OMB Control Number 1205-0NEW

A. <u>Justification.</u>

This new Information Collection Request (ICR) is being submitted to permit the Department's issuance of a new information collection instrument that will collect data on state practices pursuant to the Trade Adjustment Assistance (TAA) program under Section 239(c) of Title II, Chapter 2 of the Trade Act of 1974, as amended (19 USC § 2271 et seq.).

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.*

On June 28, 2015, the Trade Adjustment Assistance Reauthorization Act of 2015 (TAARA 2015) was signed into law. Under Section 239(c) of Title II, Chapter 2 of the Trade Act of 1974, as amended (19 USC § 2271 et seq.), the Secretary has the authority to collect any data necessary to meet obligations specified under Chapter 2 of the Trade Act of 1974.

The proper administration of the TAA Program under Chapter 2 of the Trade Act of 1974 requires that the Department identify state practices and organization that are likely to improve program operations and efficiency. There is currently no comprehensive collection of information regarding the organization and practices of State Workforce Agencies (SWAs) with regard to how the TAA Program is administered.

This collection is designed to provide discrete data on SWA organization and practices to allow the Department to identify those practices that improve program operations and performance.

The collection includes eight subjects for collection:

a. State Organization: This portion of the collection obtains information regarding staffing levels, the distribution of TAA work between various groups, information regarding the experience level of staff, and information regarding SWA centralization and localization. This information will help to determine optimal staffing levels and identify staff experience levels for optimal program operations.

b. Determinations for Eligibility and Participant Training: This portion of the collection obtains information regarding the sections or divisions of a SWA that make TAA-related determinations. This includes identifying barriers to training authorization for TAA participants. Such information will provide insight into how SWA processes can lead to rapid and accurate eligibility determinations.

c. Integration: The integration section of the collection obtains information regarding the integration between various SWA functions related to the provision of TAA services and the level of integration between the TAA Program and other SWA-administered workforce programs. This will enable the Department to identify which integration initiatives are likely to yield better outcomes for TAA participants and identify SWAs that may need additional technical assistance to promote inter-unit and inter-program integration.

d. IT Systems and Reporting: This section of the collection obtains information regarding the staff supporting TAA reporting, the integration of IT systems, how recent IT upgrades have been performed, and the use of IT systems for the delivery of TAA services. Information from this portion of the collection can be used to identify SWAs in need of IT improvements and upgrades as well as provide information regarding what IT-enabled tools are most important to TAA participant success.

e. Training for TAA Staff: This portion of the collection provides information regarding how training is delivered to state and local staff. This will allow the Department to identify which training delivery mechanisms are the most effective and allow the Department to provide technical assistance in a matter most tailored to those delivery mechanisms.

f. Outreach: The outreach portion of the collection obtains information regarding how SWAs identify worker groups that are potentially eligible for TAA, how they obtain worker information, and how successful SWAs believe they are in obtaining the necessary information. This will allow the Department to identify effective notification and outreach practices and SWAs who may be in need of technical assistance regarding the identification and notification of potentially affected workers.

g. Job Search and Relocation (JSR): This brief section collects information regarding state practice with regard to offering two specific TAA benefits: job search and relocation. The purpose is to identify the most effective times to offer benefits to workers to increase the likelihood that TAA participants take advantage of these benefits.

h. Barriers: The final section of the collection requests that SWAs identify barriers to operating an effective TAA Program. Information obtained from this section will allow the Department to better prioritize the Department's resources and the provision of technical assistance.

2. *Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

The submissions will be used by Employment and Training Administration (ETA) staff to collect information regarding SWA administration and operations of the TAA Program only to evaluate best practices. Failure to collect this information would prevent the Department from identifying the most effective mechanisms for increasing program efficiency. This is a new collection.

3. *Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.*

   The collection is designed for use with standard, widely available spreadsheet software. The spreadsheet can be transmitted electronically to minimize burden. If respondents are unable to complete the collection electronically, a paper version of the collection can be made available and transmitted by email, fax, couriers, U.S. Postal Service or a number of express delivery services to provide the correspondence.

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.*

   This information is not currently being collected in any other collections. Therefore, there is no duplication for this collection.

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

   The collection is for State grantees of the Department. No small businesses or small entities will be responding to the collection. Therefore, collection of this information does not have any impact on small businesses or other 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.*

   The Department needs the information that will be collected in order to identify best practices and disseminate best practices to increase program efficiency and improve outcomes for program participants. The data collection occurs only once per year to minimize burden. Collection less frequently than each year would prevent the Department from identifying changes in state practices and operations.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5.*

   There are no special circumstances involved in this collection.

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 April 5, 2019 (84 FR 13722).

The Department received eighteen public comments on the collection from 4 commenters. Twelve of the comments sought additional clarification on what questions were asking, which the Department provided in the revised collection. The remaining six requested small changes such as additional response options, the addition of questions, or some clarification around the collection scope. The Department made modifications, where relevant, to address all comments with the exception of one that had suggested adding significantly higher granularity that the Department determined would be overly burdensome. The attached document titled "TAA State Survey 60-Day Comments" lists all comments and the Department's responses as well as modifications to the collection.

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

There are no payments to respondents.

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

This information, in the form of a confidentiality statement, is provided to respondents on the information collection instruments:

"The U.S. Department of Labor will protect the confidentiality of the information you provide to the full extent of the law, in accordance with the Trade Act, 19 USC 2272(e)(3)(c), the Trade Secrets Act, 18 USC 1905, the Freedom of Information Act, 5 U.S.C. 552, and 29 CFR Parts 70 and 90."

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.*

The data collection includes no questions of a sensitive nature.

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

The Department estimates this annual collection to have 52 respondents corresponding to the number of SWAs administering a TAA Program. This includes all 50 States plus Puerto Rico and the District of Columbia. Further, the Department estimates the collection will take 300 minutes to complete based on estimates provided by four states.

The Department estimates a total annual cost of $7,956.00. This estimate is based on a median hourly earnings of $30.60 average hourly earnings for managerial and professional workers as reported in the BLS Current Population Survey, and assuming a 40-hour work week. Finally, SWAs are provided funding for administration and data reporting of the TAA Program that will fully cover personnel costs of this collection.

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

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Collection Response	52	Once Annually	52	5 hours	260	$30.60	$7,956.00
Unduplicated Totals	***52***	--	***52***	--	***260***	--	***$7,956.00***

** This estimate is based on a median hourly earnings of $30.60 average hourly earnings for managerial and professional workers as reported in the BLS Current Population Survey, and assuming a 40 hour work week. See: https://www.bls.gov/cps/cpsaat39.htm*

13. *Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).*

There are no capital or start-up costs involved in this collection. There is no maintenance or services required for this collection.

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.*

The annualized cost to the Federal Government is $0 as the collection can be disseminated electronically.

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

    This is a new information collection.

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.*

    There are no plans to publish the data for this collection of information.

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 of the information collection will be displayed on the report form.

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

    There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.