

**SUPPORTING STATEMENT**  
**Employment and Training Administration – Financial Report Form ETA-9130**  
**OMB Control Number 1205-0461**

**A. Justification.**

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

The Department of Labor's (DOL) Employment and Training Administration (ETA) seeks approval to extend the use of the currently approved ETA-9130 beyond the current expiration date of September 30, 2019 for most versions of the reporting form, and to extend with revisions the versions of the reporting form used for the Workforce Innovation and Opportunity Act (WIOA) Adult, Youth, and Dislocated Worker programs.

This Information Collection Request (ICR) supports sections 184 (c), 184 (d), and 185 of WIOA, and 2 CFR parts 200 and 2900

ETA proposes adding a new reporting line item entitled, *Training Expenditures*, to the WIOA Adult, Youth, and Dislocated Worker ETA-9130s.

WIOA Sec. 116. (d)(2)(F)

(2) CONTENTS OF STATE PERFORMANCE REPORTS.-

(F) IN GENERAL. – The performance report for a state should include the average cost per participant of those participants who received career and training services, respectively, during the most recent program year and the 3 preceding program years

WIOA Sec. 185(c)(1)

(c). GRANTEE INFORMATION RESPONSIBILITIES

(1) IN GENERAL. – Each state, each local board, and each recipient receiving funds under this title shall make readily accessible such reports concerning its operations and expenditures as shall be prescribed by the Secretary.

WIOA Sec. 185(d)(1)(D)

(d). INFORMATION TO BE INCLUDED IN REPORTS

(1). IN GENERAL – The reports required in subsection (c ) shall include information regarding programs and activities carried out under this title pertaining to specified costs of the programs and activities.

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

ETA utilizes the e-Grants Federal Reporting System, an online ETA-9130 reporting system, for recipient entry and certification of quarterly financial data. ETA uses the collected data to assess the effectiveness of ETA programs and to monitor and analyze the financial activity of its recipients.

This data collection format permits ETA to evaluate program effectiveness, monitor compliance with statutory limitations, and analyze financial activity, while complying with OMB efforts to streamline Federal financial reporting.

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.*

As discussed above, ETA utilizes the e-Grants Federal Reporting System, an online ETA-9130 reporting system for recipient entry and certification of quarterly financial data. The focus of all ETA reporting has been to provide ease and simplicity for the recipients. The recipient can view specific instructions relating to the required data element at each point of data entry. The timeliness of financial data has increased significantly with electronic financial reporting.

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.*

The financial reports received from ETA recipients using the current OMB-approved program-specific reporting format (different variations of the ETA-9130) is ETA's only method of receiving required financial data from recipients.

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

This data collection does not have a significant impact on small entities. Most of our direct recipients are large entities. Direct recipients secure the necessary data from their subrecipients (smaller entities in most cases) to develop and submit recipient level reports using the required reporting format.

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 this required financial data, and/or to collect it less frequently than quarterly, would be a violation of the OMB Uniform Guidance, as well as ETA program statutes, regulations, and/or individual grant agreements, all of which set forth financial reporting requirements. Further, ETA must report to Congress quarterly on WIOA financial data, including compliance with prescribed limitations.

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.

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 July 19, 2019 (84 FR 34947). No public comments were received

The Department continuously consults with its regional offices, states and grant recipients to refine and simplify overall reporting strategy. Training and technical assistance has been, and will continue to be, provided to recipient personnel who are involved in ETA financial reporting now and in the future. Continuous communication in the forms of training and providing one-on-one technical assistance for grant recipients is part of ETA's strategy to streamline and simplify all reporting efforts, while increasing the overall integrity of the reported data.

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 respondents other than remuneration of contractors or recipients.

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

This information collection does not include confidential information.

11. *Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

This information collection doesn't ask questions of a sensitive nature.

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

Our previous submission estimated the number of burden hours based on information derived from the e-Grants Federal Reporting System (rounded to the nearest thousand). The estimates remain vastly the same. Please see the revised reporting burden calculation below:

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Submitting ETA-9130	1,000	Quarterly	20,000	¾ hour	15,000	\$37.46	\$561,900
<b>Unduplicated Totals</b>	<b>1,000</b>	<b>Quarterly</b>	<b>20,000</b>	<b>¾ hour</b>	<b>15,000</b>	<b>\$37.46</b>	<b>\$561,900</b>

\* [Source: Egrants and BLS salary report.]

The above data represents average burden figures for all ETA programs reporting on the U.S. DOL ETA Financial Report. Also included in the total are ETA programs that report both program year (PY) and fiscal year (FY) dollars simultaneously per quarter. ETA strives to reduce reporting time and burden for recipients. Several sections of the ETA-9130 have pre-filled line items or automatically calculated line items, which is convenient and time saving for recipients. It will take recipients on average 45 minutes to fill out one ETA-9130 report. The total annual burden hours figure outlined in the table above is derived by multiplying the number of annual responses/reports received by the average time required for reporting per report ((20,000 reports x ¾ hour/report) / 60 min. = 15,000 hours).

Most of our grant recipient personnel submitting the ETA-9130 reports are accountants. The 2017 national mean hourly wage estimate for this occupation is \$37.46 reported by the Bureau of Labor Statistics (<http://www.bls.gov/oes/current/oes132011.htm#nat>). Therefore, it is estimated that the annual cost for the burden hours of recipient staff completing the ETA-9130 is approximately \$561,900 (15,000 hours x \$37.46/hour = \$561,900). These are allowable costs that may be charged to the recipient's grant.

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).*

Not applicable. The source information used to report expenditures and other financial information on the ETA-9130 is already gathered as part of normal business practices and to achieve compliance with other regulatory requirements.

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.*

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Reviewing the ETA-9130	1,000	Quarterly	20,000	¼ hour	5,000	\$43.82	\$219,100
<b>Unduplicated Totals</b>	<b>1,000</b>	<b>Quarterly</b>	<b>20,000</b>	<b>¼ hour</b>	<b>5,000</b>	<b>\$43.82</b>	<b>\$219,100</b>

The average Financial Analyst/Federal Project Officer in ETA is a GS-13, Step 1, with an average annual salary of \$91,458.00, based on the Fiscal Year 2019 Salary Table, and an hourly wage rate of \$43.82. The average hourly wage rate was calculated by summing up all fifty-three localities' GS-13, Step 1 hourly wage rates and the general schedule rate (available at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2019/general-schedule/>) and then dividing it by fifty-three. Based on a previous poll of ETA regional staff and ETA-9130 submission numbers extracted from the e-Grants Federal Reporting System, it takes staff approximately 5,000 hours to review and accept the ETA-9130 reports each year. At \$43.82 per hour, the estimated annual cost to the Federal government is \$219,100.

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

There are no changes in burden and costs.

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.*

The information collected will not be published.

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 will be displayed on the forms associated with this information collection request.

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

There are no exceptions.

#### **B. Collections of Information Employing Statistical Methods**

This information collection does not employ statistical methods.