

SUPPORTING STATEMENT
Youthful Offender Grants Management Information System
OMB Control No. 1205-0513

A. JUSTIFICATION

The Department of Labor (the Department), Employment and Training Administration (ETA) requests an extension without changes to the Youthful Offender Grants Management Information System in order to extend the reporting and recordkeeping requirements for youthful offender grants funded under section 169 of the Workforce Innovation and Opportunity Act (WIOA). This reporting structure features standardized data collection for quarterly Management Information System (MIS) report formats.

This request includes the collection of data by grantees on participant characteristics, services provided, and participant outcomes that feed into the grantee-submitted quarterly performance report (QPR); the quarterly narrative report (QNR); and the annual recidivism report.

The accuracy, reliability, and comparability of program reports submitted by grantees using federal funds are fundamental elements of good public administration and are necessary tools for maintaining and demonstrating system integrity. The use of a standard set of data elements, definitions, and specifications at all levels of the workforce system helps improve the quality of performance information ETA receives.

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.*

ETA is currently implementing a multi-program web-based MIS for a selection of its grant programs. However, the seven Reentry Demonstration Project (RDP) grants awarded in June 2016 and the thirteen Pathways to Justice Careers (PJC) grants awarded in June 2016 and January 2017 are still using the legacy Youthful Offender MIS under OMB Control Number 1205-0513. Based on the current funding levels of these grants, one RDP grant and four PJC grants may still be active after the current ICR for this data collection expires on January 31, 2020. This request is to extend the approval of this data collection for one year to allow continued reporting access for the remaining RDP and PJC grants.

This request continues the reporting and recordkeeping system for a minimum level of information collection that is necessary to comply with Equal Opportunity requirements, to hold Youthful Offender grantees appropriately accountable for the Federal funds they receive, and to allow the Department to fulfill its oversight and management responsibilities.

WIOA section 185 broadly addresses the requirements for reports and recordkeeping across programs authorized under Title I of the Act. The provisions of section 185:

- require the Secretary to ensure that all elements of the information required for reports be defined and reported uniformly [section 185(d)(2)]
- direct each state, local board, and recipient (other than a sub-recipient, sub-grantee, or contractor of a recipient) to prescribe and maintain comparable management information systems, in accordance with the guidelines that shall be prescribed by the Secretary designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with the nondiscrimination provisions in section 188 [section 185(c)(2)]
- require that recipients of funds under Title I shall maintain such records and submit such reports in such form and containing such information as the Secretary may require regarding the performance of programs and activities carried out under Title I [section 185(a)(2)]
- require that recipients of funds under Title I shall maintain standardized records for all individual participants and provide to the Secretary a sufficient number of such records to provide for an adequate analysis of the records [section 185(a)(3)];
- specify in section 185(d) that the reports shall include information about programs and activities carried out under Title I pertaining to:
 - A. relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants
 - B. programs and activities in which participants are enrolled, and the length of time that participants are engaged in such programs and activities
 - C. outcomes of the programs and activities for participants, including the occupations of participants and placement for participants in nontraditional employment
 - D. specified costs of the programs and activities
 - E. information necessary to prepare reports to comply with the nondiscrimination provisions in section 188 and 29 CFR Part 37.37 [(a-b), (d-e)].
- require that all elements of the information required for the reports described in section 185(d)(1)(A-E) above are defined and uniformly reported.

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 provides grantees through this ICR with a web-based system to collect baseline information on participants and to track their activities and outcomes in the program. The grantees provide ETA with quarterly performance reports aggregating the demographic characteristics of enrollees, services provided, and participant outcomes. ETA uses the information from the current collection to aggregate the data provided by grantees into a quarterly report of youth offender grants, which ETA publishes on ETA's web site along with similar reports compiled for other ETA programs.

Within ETA, the Office of Workforce Investment and regional offices use the data under the current collection to monitor the progress of grantees, identify problems that grantees are facing, and target technical assistance to grantees. The performance data is also used to rate the past performance of grantees as part of the review process in competitions for new Youthful Offender grants. The quarterly performance report data is used by ETA to ensure compliance of Youth Offender grants in meeting Government Performance and Results Act (GPRA) goals. The performance data summarizing numbers served and key outcomes are also submitted to Congress through OMB in the President's annual budget request.

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.*

To comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of participant data and the preparation of quarterly reports by providing a web-based MIS and by providing uniform data elements and data definitions to grantees across WIOA-authorized programs. ETA requires grantees to submit quarterly performance reports electronically on spreadsheets using the quarterly performance report template approved under this ICR. Grantees use a combination of ETA's Youthful Offender MIS, their own internal data tracking systems, and case files to generate the data on the quarterly performance reports that they submit.

4. *Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

ETA has minimized the reporting burden by limiting the number of required data elements. Data items collected by program reports and individual records are needed to account for the detailed services provided by grantees. Information provided through this QPR is not available through other data collection and report systems.

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

For reporting purposes, the involvement of small businesses or other small entities that are not grantees or sub-grantees is extremely limited. The only time contacting them may be required is during the provision of a service or to verify employment or retention of participants employed by them. Methods to minimize the burden on small entities that are grantees or subgrantees are discussed in other sections of this supporting statement.

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.*

Quarterly Performance Reports allow the Department to monitor grantee progress toward its performance goals and provide timely assistance to the grantees if needed. Without consistent reporting, the Department would not be fulfilling its responsibility to monitor its grants and would not be able to determine if grantees are making satisfactory progress in implementing their projects.

As noted above, WIOA section 185(a)(2) requires that recipients of funds under Title I shall maintain such records and submit such reports in such form and containing such information as the Secretary may require regarding the performance of programs and activities carried out under Title I.

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 data collection effort does not involve any special circumstances. This request is consistent with 5 CFR 1320.5.

8. *If applicable, provide a copy and identify the data 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.

A 60-Day Notice for Public Comment was published in the *Federal Register* on September 5, 2019 (84 FR 46761). No comments were received.

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 other than the grant funds that they receive.

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

ETA is responsible for ensuring Youthful Offender participant personally identifiable information (PII) is protected. ETA will maintain PII in accordance with all applicable Federal laws, with particular emphasis on compliance with the provisions of the Privacy and Freedom of Information Acts. The Department works diligently to ensure the highest level of security whenever PII is stored or transmitted. All contractors that have access to PII are required to provide assurances that they will respect and protect the privacy of the data. ETA's Office of Information Systems and Technology (OIST) is an active participant in the development and approval of data security measures – especially as they apply to this web-based system. As a safeguard measure, any information that is shared or made public by ETA is aggregated at the national program level and does not reveal personal information on specific individuals or programs. ETA also emphasizes to grantees their obligation to protect the identity of juvenile offenders that they serve and to maintain the confidentiality of juvenile justice information that they have accessed.

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.

Grantees will be collecting data on participants related to involvement in the juvenile or adult criminal justice system. The collection of information on juvenile or adult criminal system involvement is necessary given that the funding for this set of grants comes from an appropriation expressly devoted to serving youthful offenders and youth at risk of offending. As previously described, this information is carefully protected and is only used to document eligibility, assess and provide targeted services to meet the needs of individual participants, and document recidivism outcomes.

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

The annual national burden for Youthful Offender reporting has four components: (1) the participant data collection burden on grantees and enrollees; (2) the quarterly performance report burden; (3) the quarterly narrative report burden; and (4) the annual burden of collecting recidivism information. This response provides a separate burden for each of these four components. The Department anticipates that one RDP grant and four PJC grants may still be continuing after the current ICR expires on January 31, 2020, and will be required to continue reporting under this ICR after the current expiration date.

(1) Participant Data Collection Burden

The Youthful Offender **participant data collection burden** considers the amount of participant and performance-related information collected and reported that would not have to be collected by the grantees as part of their customary and usual burden to run the program. Thus, the burden reflects the information collected by grantees and the information provided by enrollees solely to

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comply with the federal reporting requirements. Youthful Offender grantees will have some additional burden to set up systems for tracking the participation of enrollees in program activities and for tracking the program outcomes of enrollees, but these tracking systems can be considered as data necessary to run the program. The data collection burden will vary by participant based on the range and intensity of services provided by the grantee and will also vary by grantee based on the number of participants served.

Record Type	Hrs. Per Record	Estimated National Count of Participants	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Participant, burden on grantee staff for collection	2	1,000	2,000	\$15.19	\$30,380

Record Type	Hrs. Per Record	Estimated National Count of Participants	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Participant, burden on enrollee for intake information	.75	1,000	750	\$7.25	\$5,438

Hourly rates used to calculate cost depend upon the type of organization administering the program. For private non-profit grantees, the hourly rate is the average hourly earnings in the Census Bureau’s social assistance industry category (February 2019, Current Employment Statistics Survey, U.S. Census Bureau). Source: https://www.bls.gov/opub/ee/2019/ces/table8a_201903.htm. For enrollees, the federal minimum wage is used to approximate opportunity costs.

(2) Quarterly Performance Report Burden

The **quarterly performance report burden** assumes that all grantees will use the Quarterly Performance Report (QPR) template approved under this ICR. Grantees will report information on enrollee characteristics, services provided, placements, and outcomes based on a combination of data collected through the ETA-provided MIS and participant case files. The burden includes reviewing and correcting errors identified by the MIS in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports.

Report	Hrs. Per	Number of	Annual	Applicable	Monetized
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	Report	Reports (5 grantees x 4 quarters)	National Burden Hours	Hourly Rate	Burden Hours
Quarterly Performance Report	20	20	400	\$15.19	\$6,076

Hourly rates used to calculate cost depend upon the type of organization administering the program. For private non-profit grantees, the hourly rate is the average hourly earnings in the Census Bureau’s social assistance industry category (February 2019, Current Employment Statistics Survey, U.S. Census Bureau). Source:

https://www.bls.gov/opub/ee/2019/ces/table8a_201903.htm.

(3) Quarterly Narrative Report Burden

The **quarterly narrative report burden** considers the time it will take the grantee staff to prepare quarterly summaries of progress to date, challenges and concerns, items to be resolved, partnerships with other local agencies, success stories, and plans for the next quarter.

Report	Hrs. Per Report	Number of Reports (5 grantees x 4 quarters)	Annual National Burden Hours	Applicable Hourly Rate	Monetized Burden Hours
Quarterly Narrative Report	16	20	320	\$15.19	\$4,861

Hourly rates used to calculate cost depend upon the type of organization administering the program. For private non-profit grantees, the hourly rate is the average hourly earnings in the Census Bureau’s social assistance industry category (February 2019, Current Employment Statistics Survey, U.S. Census Bureau). Source:

https://www.bls.gov/opub/ee/2019/ces/table8a_201903.htm.

(4) Annual Recidivism Report Burden

The **annual recidivism report burden** considers the time it will take adult and juvenile justice system staff to review individual juvenile and criminal records to determine which participants have been convicted of a new offense within 12 months of their release from a correctional facility or being placed on probation.

Record Type	Hrs. Per Record	PY 12 Estimated	Annual National	Applicable Hourly Rate	Monetized Burden Hours
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		National Count	Burden Hours		
Recidivism Report	.5	1,000	500	\$15.19	\$7,595

Hourly rates used to calculate cost depend upon the type of organization administering the program. For private non-profit grantees, the hourly rate is the average hourly earnings in the Census Bureau’s social assistance industry category (February 2019, Current Employment Statistics Survey, U.S. Census Bureau). Source:

https://www.bls.gov/opub/ee/2019/ces/table8a_201903.htm.

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 (Hours)	Total Annual Burden (Hours)	Hourly Rate	Monetized Value of Respondent Time
Grantees’ Participant Data Collection	5 grantees	Ongoing	1,000	2.0	2,000	\$15.19	\$30,380
Participant Data Disclosure	1,000 participants	Ongoing as	1,000	0.75	750	\$7.25	\$5,438
Grantees’ Quarterly Performance Report	5 grantees	Quarterly	20	20	400	\$15.19	\$6,076
Grantees’ Quarterly Narrative Report	5 grantees	Quarterly	20	16	320	\$15.19	\$4,861
Juvenile Justice Agencies’ Annual Recidivism Report	5 Justice Agencies	Annually	1,000	.5	500	\$15.19	\$7,595
Unduplicated Totals	1,020	Varies	3,040	Varies	3,970	Varies	\$54,350

13. Provide an estimate of 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 shown in Items 12 and 14).

Start-up/capital costs: There are no start-up costs for grantees as grantees covered under this ICR have already been operating and already have their systems in place to collect and maintain participant data, apply edit checks to the data, and generate the quarterly reports.

Annual costs: Given that the grantees covered under this ICR are continuing grantees who are already familiar with providing data to DOL, annual costs will be minimal and are estimated to be \$70,000, including contractor and grantee staff time, to address issues that may arise requiring technical assistance.

14. *Provide estimates of annualized cost 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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.*

The additional cost to the Federal government for this ICR extension will be \$906.84 based on 12 hours of time by a GS-14 Step 10 employee at an hourly rate of \$75.57 based on the 2020 GS Pay Schedule to review and analyze the data reported by grantees. There are no additional operational costs for equipment, overhead, printing, or support costs.

15. *Explain the reasons for any program changes or adjustments.*

The only adjustment is the decrease in burden hours due to the reduced number of grantees using the system during the extension period of this ICR.

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.*

Based on the grant announcement and their grant agreement, grantees will continue to submit MIS performance reports on a quarterly basis to ETA within 45 days of the end of each quarter. ETA does not plan to post the quarterly reports submitted under this ICR on its web site. No complex analytical techniques are contemplated.

17. *If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

We are not seeking approval to have the expiration date concealed.

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

No exceptions are requested in the “Certification of Paperwork Reduction Act Submissions.”

B. Collection of Information Employing Statistical Methods

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This information collection request does not contain statistical methods.