

**SUPPORTING STATEMENT**  
**TAA Efforts to Improve Outcomes**  
**OMB Control Number 1205-0392**

**A. Justification.**

This Information Collection Request (ICR) is being submitted to modify the existing collection Trade Act Participant Report (OMB 1205-0392), which is required to be submitted quarterly by states administering the Trade Adjustment Assistance (TAA) program to the Employment and Training Administration (ETA) of the U.S. Department of Labor. The proposed ICR differs from the current collection in that the volume of information collected in the proposed ICR is significantly reduced – *from 144 data elements in the current collection, to a single narrative element for the proposed collection.* More specifically, the current collection is comprised of:

1. 143 data elements that collect individual participant-level TAA activity, and
2. One data element designed to collect information on state-level program activity, explicitly "*a description of efforts made to improve outcomes for workers under the trade adjustment assistance program that promote efficiency and effectiveness.*"

All of 143 data elements have been subsumed under ETA-9172 - Participant Individual Record Layout (OMB No. 1205-0521), which provides integrated participant level data reporting for multiple ETA programs, including TAA. Thus, the proposed collection for OMB No. 1205-0392 only seeks to extend the collection of (2). As such, the collection title will be changed from "Trade Activity Participant Report" to "TAA Efforts to Improve Outcomes."

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(j)(1)(c) of Title II, Chapter 2 of the Trade Act of 1974, as amended (19 USC § 2271 et seq.), the Secretary is required to collect "a description of efforts made to improve outcomes for workers...." In addition to mandatory annual reporting, the TAA program collects these descriptions on a quarterly basis in order to track progress of efforts to improve outcomes and speed the identification new state practice. This ICR relies on the following authorizing statutes:

- Consolidated Security, Disaster Assistance, and Continuing Appropriations Act, 2009, PL 110-329, Sec. 154
- Vow to Hire Heroes Act, PL 11-256, Sec. 239
- Trade Act of 1974, as amended (19 USC § 2311 et seq. 19 USC § 2323 et deq), PL 112-40, Sec. 233(f), 239(j), 249(B) and PL 93-618, Sec. 222(b)(3)

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 identify and highlight successful state practices, including the use of case management funds and innovative outreach strategies. The identification of these practices helps the Department of Labor (the Department) determine which states to reach out to for webinars, conferences, peer collaboration, and feedback on planned Departmental changes. This information is also made available publicly on the Department's website at:  
<https://doleta.gov/tradeact/taa-data/participant-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.*

The collection will be conducted through the Workforce Integrated Performance System (WIPS) and submitted on form ETA-9173 (OMB No. 1205-0521). This online system requires State grantees to create and maintain an account. Access to this system is already required of all State grantees for other required collections, so this does not create any additional burden.

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 collection is the only required narrative collection specific to state efforts to improve outcomes in the TAA program. As such, there is no other collection that could meet the statutory reporting requirements under Section 239(j)(1)(c) of the statute.

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.*

Under Section 239(j)(1)(c) of the statute, the Department is required to collect this information annually. Collecting the information only annually, rather than quarterly, diminishes the Department's value in the information as a tool to understand these efforts, their progress, and to deliver appropriate technical support to State efforts.

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.*

A 60-Day Notice for Public Comment was published in the *Federal Register* on September 25, 2019 (84 FR 50475). 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.

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

No confidentiality statement is provided to respondents. Responses are made available to the public.

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 State grantees 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 30 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, State grantees 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 (in hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Collection Response	52	Quarterly	208	0.5	104	\$30.60	\$3,182.40
<b>Unduplicated Totals</b>	<b>52</b>	--	<b>208</b>	--	<b>104</b>	--	<b>\$3,182.40</b>

\* 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 is fully integrated into pre-existing electronic systems.

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

This collection is being modified significantly as to no longer require the submission of individual participant records under the Trade Activity Participant Report (TAPR). The prior

TAPR data constituted the bulk of the burden of this collection, reducing the estimated total burden from 18,500 hours to 104 hours.

16. *For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

Information provided in this collection is made available on the Department's website for public viewing at: <https://doleta.gov/tradeact/taa-data/participant-reporting/>. No analytical techniques are used in the construction of this information, but submissions are reviewed to ensure no private information has been erroneously submitted.

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 Department seeks approval to not display the expiration date on the form because the submission form is embedded in other workflows. Furthermore, the screen and system used for collection is similarly used for other collections by other programs. This collection is expected to be renewed in perpetuity as long as the information is required under Section 239(j)(1)(c) of the statute.

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.