

It appears that this collection is for a census of all participating SWAs (50 states + Puerto Rico and DC). In that case, we consider the collection to be employing statistical methods and the Program will need to provide a Part B. When adding Part B, the Program should also clarify whether SWAs are obligated to respond based on existing participation agreements with DOL. I will send the collection back as “improperly submitted” so this can be corrected and the corresponding flags in ROCIS can be activated upon resubmission.

Thank you for bringing this to our attention. Subpart B has been added and includes such clarifications which are also in Subpart A, Q1.

In Part A, we’ll need an updated response to Q14. The current response seems implausible: “The annualized cost to the Federal Government is \$0 as the collection can be disseminated electronically.” There will be DOL staff time to read and analyze the responses in order to identify best practices, correct?

The collection is for discrete data rather than narrative fields, so the time to read and analyze responses is minimal. A more fulsome discussion of the estimate has been provided in the revised Subpart A. However, the annualized estimate is still \$0 as a conservative estimate because we actually anticipate this will reduce total federal staff time needed.

Also, is the intention that the collection be ongoing and annual? If so, why is that necessary?

Yes, this is anticipated to be ongoing and annual because states have been revising their methodology of program operations. Annual data is necessary to understand these changes in state organization over time. A brief discussion of this has been added to Subpart A, Q1 as well as Subpart B.

TAA was reauthorized in 2015 – why is this collection being initiated now?

There have been recent changes in SWA approaches to service delivery models and the program anticipates shortly issuing revised regulations on program operations.

Could this information be collected through some other – existing mechanism? For example, in performance or summary reports or renewal applications or some other routine data submission by SWAs? Please clarify.

No. A further explanation was provided in revised Q4, but no other SWA collections for this program operate on the same frequency and this information is very different and not easily integrated into those reporting mechanisms. For example, the program currently requires submission of participant data for performance reporting, but that is conducted quarterly. It is also necessary that the timing of this collection be asynchronous from that collection to ensure that there are no delays in collecting participant performance information which is already subject to tight timelines. By conducting this as a separate collection, it allows the Department to place that annual collection to minimize burden on SWAs.

Finally, in terms of the actual collection – will States be emailed the spreadsheet or will it be accessed through an online portal? Clarification around the instructions would be helpful to include in Part A.

Yes, they will be emailed a spreadsheet. I have added this explanation to Q14.