

SUPPORTING STATEMENT
Workforce Innovation and Opportunity Act Joint Quarterly Narrative Performance
Report
OMB Control No. 1205-0448

The Department of Labor (DOL) seeks approval of a revision to a current information collection request (ICR) titled “Workforce Innovation and Opportunity Act Joint Quarterly Narrative Performance Report” (OMB Control No. 1205-0448). This ICR expires on May 31, 2021.

This ICR revises and updates the following aspects of the information collection:

- ETA has added Apprenticeship grants to the list of grant programs which use the Workforce Innovation and Opportunity Act (WIOA) Joint Quarterly Narrative Performance Report (Referred to as the “Joint QNR” in this document);
- Minor edits have been made to the Joint QNR Template for streamlining and clarification purposes to include formatting, grammatical and capitalization edits, and ensuring each section includes an introductory sentence which identifies the purpose; and
- For the Senior Community Service Employment Program (SCSEP) Data Validation, the following non-substantive changes were made:
 - In the prior submission for approval of this control number, the SCSEP Data Validation Handbook was inadvertently listed as removed from approval. As was noted in that submission and in the current submission, the Data Validation Handbook is essential for the effective use of data and ETA seeks its approval.
 - Effective July 1, 2018, the Older American Act changed the three SCSEP employment outcome measures to the corresponding WIOA employment outcome measures. The change to the specific data elements for the three measures was approved under OMB Control Number 1205-0040 in 2018 and has been incorporated into the SCSEP Data Validation. At the same time, the change to exit reasons that constitute an exclusion from the three outcome measures was also approved under OMB Control Number 1205-0040 and is being incorporated into the SCSEP Data Validation. All but one of the changed validation elements are listed in the attached PY 2020 Data Validation Handbook dated November 2020; the remaining change will be reflected in the PY 2021 version of the Handbook.
 - For the data validation done through the PY 2020, the core performance measure “Community Service” is validated through the two components provided by the grantees, total paid hours and paid training hours. The source documents that grantees use to validate these components are their payroll records. In accordance with the Older Americans Act and the SCSEP regulations, most grantees have recently begun providing necessary paid sick leave to participants unable to continue in their community service assignments during the pandemic. As a result, the community service measure calculation has been revised to include paid sick leave. This third component of the community service measure will also be validated by comparison to the grantees’ payroll records and thus will not increase the burden hours for this measure. This change will also be reflected in the PY 2021 version of the Data Validation Handbook.

- One final non-material change to the SCSEP data validation is the addition of a new data element, required by the 2020 reauthorization of the Older Americans Act. The Supporting Older Americans Act of 2020 (P.L. 116-131) adds formerly incarcerated individuals as both a priority of service population for the purposes of enrollment and as participants potentially eligible for an extension of the statutory durational limit due to their low employment prospects. This new barrier to employment category is also included in the core measure of participants who are most-in-need. Because this same data have been collected and validated by grantees under the existing barrier to employment for individuals with poor employment prospects, the addition of this new data element will not increase the burden hours. This change will also be reflected in the PY 2021 version of the Data Validation Handbook.

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.*

This ICR allows ETA's Senior Community Service Employment Program (SCSEP) to perform data validation on data collected and reported to ETA on program activities and outcomes; and provides a streamlined joint quarterly narrative performance report template to support the reporting and program evaluation requirements for the following grant ETA grant programs: National Dislocated Worker Grants (DWG), H-1B Job Training grant programs (started July 1, 2016 or later), National Farmworker Jobs Program (NFJP), Reentry Employment Opportunities (REO) youth and adult grant programs, SCSEP, YouthBuild (YB) and Apprenticeship grant programs.

SCSEP Data Validation

The SCSEP data validation process assesses the accuracy of data collected and reported to ETA on program activities and outcomes. The accuracy and reliability of program reports submitted by states and grantees using federal funds are fundamental elements of good public administration, and are necessary tools for maintaining and demonstrating system integrity. The data validation requirement for employment and training programs strengthens the workforce system by ensuring that accurate and reliable information on program activities and outcomes is available.

Grantees receiving funding under Title V of the Older American Act are required to maintain and report accurate program and financial information (20 CFR 641.879). Further, grantees receiving SCSEP funding from ETA are required to submit reports or participant data and attest to the accuracy of these reports and data.

To meet the Agency's commitment to accurate and reliable data, ETA implemented a data validation requirement to ensure the accuracy of data collected and reported on program activities and outcomes.

ETA has developed a process for validating data submitted by states and grantees. Data validation consists of two parts:

- 1) **Report validation.** ETA assures the validity of SCSEP aggregate reports by using the SCSEP Performance and Reporting System to automatically generate the grantee-level aggregate reports based on the grantee's individual record files entered into the system and the performance reporting specifications for the quarterly and final year-end report. Edit checks built into the system assure the validity of SCSEP's performance reports. No additional approval is sought for SCSEP report validation.
- 2) **Data element validation** appraises the accuracy of the data entered into the SCSEP Performance and Reporting System. Data element validation is conducted by manually reviewing annual samples of participant records with respect to their underlying source documentation in an effort to (1) confirm the accuracy of the data contained in the automated system and (2) to affirm compliance with program-specific federal definitions and requirements. The results of data element validation are utilized to identify areas on which to focus system and grantee resources in order to systematically improve program management over time.

This approach addresses the two fundamental sources of reporting errors within ETA program data: (1) data collection or entry error; and (2) inaccurate computation of the required aggregate reports at the grantee level. If the data collected are systematically incorrect or data entry errors routinely occur, then the performance information will not be accurate even though the SCSEP Performance and Reporting System is used to produce the aggregate reports. Data element validation addresses this issue by comparing performance-related data in each grantee's participant record files to the original data in the source files and determining an error rate that indicates the degree of accuracy of each data element used in calculating the grantee's performance results, eligibility determinations, or reported compliance with program requirements.

Previous experience with data validation has indicated that grantees are able to conduct data validation with a reasonable, but sustained, level of effort, and the validation process allows grantees to identify and address data collection and reporting errors. On the basis of the significant benefits of data validation along with its minimal burden going forward, ETA seeks to extend the existing data validation requirement for SCSEP.

SCSEP grantees use the SCSEP Performance and Reporting System to access all information required for data element validation, to enter their validation of each data element, and to generate reports of the results of their validation. The SCSEP Data Validation Handbook and Data Collection Handbook provide a more detailed explanation of the validation process and provide standards and specifications for each data element required to be validated. These handbooks are made available electronically through the Older Worker Community of Practice (olderworkers.workforcegps.org).

Joint Quarterly Narrative Performance Report (Joint QNR)

The WIOA Joint Quarterly Narrative Performance Report (Joint QNR) provides a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter. It also provides information on grant challenges and timeline progress, as well as the opportunity to share success stories. Prior to the use of the Joint QNR, grantees provided quarterly narrative reports through several ETA-provided, Web-based management systems, or by email to Federal Project Officers where such systems did not exist. The continued use of a standardized narrative report supports WIOA implementation and the goal of systems alignment and consistency of reporting. This template also helps ensure consistent identification of technical assistance needs across the discretionary programs that are reporting on WIOA performance indicators, and contributes to improved quality of performance information that ETA receives. All data collection and reporting is done by ETA grantee organizations (including, but not limited to: state or local governments, not-for-profit organizations, or faith-based and community organizations, and educational institutions) or their sub-grantees.

NFJP and YouthBuild grants are authorized under WIOA, and REO is authorized under WIOA Sec. 169's demonstration authority. The WIOA encompasses comprehensive legislation reforms and modernized the public workforce system and reaffirms the role of the public workforce system, and enhances several key employment, education, and training programs. The WIOA identified performance accountability requirements for NFJP and YouthBuild grants, and these performance indicators and reporting requirements also apply to the DWG program. While H-1B and Apprenticeship grants are not authorized under WIOA, these programs have adopted the WIOA performance indicators and align with WIOA data element definitions and reporting templates to promote consistency across these DOL-funded programs. SCSEP, authorized under the Older Americans Act, as amended (PL 114-144), as described previously, is also required by the Older Americans Act to adopt some of the WIOA performance measures and for this reason, has adopted the WIOA Joint QNR.

To support these legislative requirements, DWG, H-1B, NFJP, REO, SCSEP, YouthBuild and Apprenticeship grantees submit participant-level data quarterly for individuals who receive services through these programs using the WIOA performance reporting system, *Workforce Integrated Performance System* (WIPS). The performance reports generated from WIPS include aggregate data on demographic characteristics, types of training and other services received, placements, outcomes, and follow-up status using shared data elements. Using the Joint QNR template furthers the WIOA legislative requirements and ensures that grantees are fully describing WIOA-related activities in a narrative format to ensure strong performance management.

The Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance") streamlines the federal government's guidance on grant management and placed requirements on specific information that grantees should report to their federal funders. The use of a Joint QNR template ensures that each of these grant programs is meeting the Uniform Guidance requirements related to narrative grant reporting as laid out in the Final Rule.

ETA uses data collected from the Joint QNR to demonstrate to Congress and the public the progress and success of these grants; hold grantees accountable for the federal funds they receive; and support oversight, management, and 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.*

Senior Community Service Employment Program (SCSEP) Data Validation

ETA uses SCSEP data validation results to evaluate the accuracy of data collected and reported to ETA on program activities and outcomes. This information collection enables ETA to assure its customers, partners, and stakeholders of the validity of performance data underlying this program.

Joint Quarterly Narrative Performance Report (Joint QNR)

Additionally, ETA uses the information collected in the Joint QNR to ensure grantees are effectively managing their programs, meeting the milestones and objectives as described in their grant statements of work, and to identify areas where grantees may need additional technical assistance or monitoring. These reports also help ETA to identify promising grant practices across multiple ETA programs.

In addition to using the information within ETA for monitoring and continuous improvement, ETA uses the reports to respond to oversight inquiries, provide information to the public on the performance of the grants, and inform evaluations.

The reports and other analyses of the data are made available to the public through publication and other appropriate methods, and to the appropriate congressional committees through copies of such reports, including ETA's Quarterly Workforce System Results Report.

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.*

Senior Community Service Employment Program (SCSEP) Data Validation

ETA developed web-based software that grantees use to conduct SCSEP data validation:

- **Software** developed by ETA generates samples, worksheets, and reports on data accuracy. For report validation, the SCSEP Performance and Reporting System is used to automatically generate the aggregate reports that are accessible to grantees. For data element validation, the system generates a random sample of the participant records and data elements for the grantee to validate. The system produces worksheets on which the validator records information after checking the source documentation in the sampled case files. The system calculates error rates for each data element, with confidence intervals varying with the size of

the sample, from 3.5 percent to 4 percent. Details of the Data Validation sampling are provided in Part B.

- **User handbooks** are available that provide detailed information on completing data element validation. The Data Validation Handbook also explains the validation methodology, including sampling specifications and validation instructions for each data element to be validated. The Data Validation Handbook is updated each program year in response to questions from and issues identified by the grantees.

Currently, all SCSEP grantees use the data validation page within the SCSEP Performance and Reporting System to conduct validation. SCSEP grantees can obtain technical assistance on validation procedures and the use of the validation tools from ETA's data validation contractor and national office staff. The system uses the validation data already provided by the grantees to produce validation summary reports.

Joint Quarterly Narrative Performance Report (Joint QNR)

To comply with the Government Paperwork Elimination Act, ETA has streamlined the collection of participant data and the preparation of quarterly reports to the extent feasible by providing uniform expectations of narrative information that should be shared across grant programs. The Joint QNR is submitted to ETA using the WIOA performance reporting system, *Workforce Integrated Performance System* (WIPS), or via email to the assigned Federal Project Officer in order to align with the above objective.

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 Department holds grantees accountable by requiring them to identify and work toward comprehensive performance standards that are validated, and by establishing quarterly reports for competitive projects. WIOA and the Uniform Guidance provide reporting requirements for grantees. The WIOA Joint QNR is a template to ensure adherence to these requirements. Neither the SCSEP data validation requirement nor the narrative performance report duplicates any existing ETA requirement.

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

For reporting and data validation purposes, the involvement of small businesses or other small entities that are not grantees or sub-grantees is extremely limited. Information collection from small businesses or other small entities is typically only required as part of the provision of a grant-related service to a grantee.

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.*

Senior Community Service Employment Program (SCSEP) Data Validation

The continuation of SCSEP data validation will allow ETA to continue to ensure grantees are complying with requirements to submit accurate data. If data validation is discontinued, SCSEP will not be able to ensure that critical data used for performance reports and accountability purposes, and for other management purposes, are reliable.

Joint Quarterly Narrative Performance Report (Joint QNR)

Monitoring and reporting program performance under grants and agreements is governed by 2 CFR 200.328 (78 F.R. 78589, December 26, 2013), which states that DOL shall prescribe the frequency with which performance reports shall be submitted, and that performance reports shall not be required more frequently than quarterly or, less frequently than annually. If ETA does not comply with these requirements, funding for demonstration programs would be compromised. In applying for grants from the programs described in the Section A1, grantees agree to meet ETA's reporting requirements, which requires the submission of quarterly reports within 45 days after the end of the quarter.

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.*
 - Requiring respondents to report information to the agency more often than quarterly;*
 - * Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
 - * Requiring respondents to submit more than an original and two copies of any document;*
 - * Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
 - * In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
 - * Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
 - * That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
 - * Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

This ICR is consistent with 5 CFR 1320.5.

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 October 7, 2020 (85 FR 63297). There were no public comments.

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

This information collection does not involve direct payments to respondents.

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

Senior Community Service Employment Program (SCSEP) Data Validation

Participant record layouts used in data validation for SCSEP utilize unique individual identifiers rather than Social Security Numbers (SSNs). To protect the privacy of program participants, the validation system never receives an SSN and includes user functionality that allows program administrators to limit access to data validation information. Only validators designated by the program administrator have access to validate records. No other means of access to these data is permitted.

Joint Quarterly Narrative Performance Report (Joint QNR)

Individual-level participant data is not requested for the Joint QNR. The Joint QNR involves the receipt and review of grant program summaries and other narrative information submitted to ETA and does not contain private information. While this information collection makes no express assurance of confidentiality, ETA is responsible for protecting the privacy of participants and performance data and will maintain the data in accordance with all applicable Federal laws, with particular emphasis on compliance with the provisions of the Privacy and Freedom of Information Acts. This data is covered by a System of Records Notice, DOL/ETA-15, published April 8, 2002 (67 FR 16898 et seq).

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 statement should:*

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.*
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under “Annual Cost to Federal Government.”*

The completion of the SCSEP data validation and the Joint QNR is estimated to require an annual burden of 50,594 hours. See Table 1 below for additional information. The estimated annual hours needed to conduct SCSEP data validation is 40.5 hours on average per grantee and 3,118.50 hours for all grantees.

Joint QNR burden involves providing a detailed account of all activities undertaken during the quarter including in-depth information on accomplishments, promising approaches, progress toward performance outcomes, and upcoming grant activities. ETA assumes each grantee will spend approximately ten hours per quarter preparing this report.

ETA calculated the estimated number of grantees based on the number of active DWG, H-1B, NFJP, REO, SCSEP, Apprenticeship, and YouthBuild grants over the life of these reporting requirements, if approved.

Table 1 – Disaggregated Summary Calculation of Annual Burden for Grantees for SCSEP Data Validation

Activity	No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Average Burden Hours	Total Burden Hours	Hourly Wage Rate	Total burden Cost
SCSEP Total	77	4	308	40.5	12,474	\$24.15/\$33.77	\$388,519.74
Private Sector (Non-Profits)	21	4	84	40.5	3,402	\$24.15	\$82,158.30
State, Local, or Tribal Government	56	4	224	40.5	9,072	\$33.77	\$306,361.44

Table 2 – Disaggregated Summary Calculation of Annual Burden for Grantees for Joint Quarterly Narrative Performance Report

Activity	No. Respondents	No. of Responses per Respondent	Total Annual Responses	Average Burden Hours	Total Burden Hours	Hourly Wage Rate	Total Burden Cost
DWG Total	159	4	636	10	6,360	\$24.15/\$33.77	\$212,853.20
Private Sector	5	4	20	10	200	\$24.15	\$4,830.00
State, Local, or Tribal Government	154	4	616	10	6160	\$33.77	\$208,023.20
H-1B Total	100	4	400	10	4,000	\$24.15/\$33.77	\$125,075.20
Private Sector	26	4	104	10	1,040	\$24.15	\$25,116.00
State, Local, or Tribal Government	74	4	296	10	2,960	\$33.77	\$99,959.20
NFJP Total	62	4	248	10	2,480	\$24.15/\$33.77	\$60,661.60
Private Sector	60	4	240	10	2,400	\$24.15	\$57,960.00
State, Local, or Tribal Government	2	4	8	10	80	\$33.77	\$2,701.60
REO Youth & Adult Total	165	4	660	10	6,600	\$24.15/\$33.77	\$190,943.60

Workforce Innovation and Opportunity Act Joint Quarterly Narrative Performance Report

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Private Sector	83	4	332	10	3,320	\$24.15	\$80,178.00
State, Local, or Tribal Government	82	4	328	10	3,280	\$33.77	\$110,765.60
SCSEP Total	77	4	308	10	3,080	\$24.15/ \$33.77	\$95,930.80
Private Sector	21	4	84	10	840	\$24.15	\$20,286.00
State, Local, or Tribal Government	56	4	224	10	2,240	\$33.77	\$75,644.80
YB Total	210	4	840	10	8,400	\$24.15/ \$33.77	\$243,264.00
Private Sector	105	4	420	10	4,200	\$24.15	\$101,430.00
State, Local, or Tribal Government	105	4	420	10	4,200	\$33.77	\$141,834.00
Apprenticeship Total	180	4	720	10	7200	\$24.15/ \$33.77	\$231,600
Private Sector	30	4	120	10	1200	\$24.15	\$28,980.00
State, Local, or Tribal Government	150	4	600	10	6000	\$33.77	\$202,620.00
All Grantees Total	953	4	3,812	10	38,120	\$24.15/ \$33.77	\$1,160,328.40

Table 3 - Calculation of Annual Burden for DWG for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	5	20	40 (per grantee)	\$24.15	\$4,830.00
State, Local or Tribal Government	154	616	40 (per grantee)	\$33.77	\$208,023.20
All Grantees	159	636	6,360	--	\$212,853.20
Avg. per Grantee	--		40	--	\$1,338.70

Table 4 - Calculation of Annual Burden for H-1B for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	26	104	40 (per grantee)	\$24.15	\$25,116.00
State, Local or Tribal Government	74	296	40 (per grantee)	\$33.77	\$99,959.20

All Grantees	100	400	4,000	--	\$125,075.20
Avg. per Grantee	--		40	--	\$1,250.75

Table 5 - Calculation of Annual Burden for NFJP for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	60	240	40 (per grantee)	\$24.15	\$57,960.00
State, Local or Tribal Government	2	8	40 (per grantee)	\$33.77	\$2,701.60
All Grantees	62	248	2,480	--	\$60,661.60
Avg. per Grantee	--		40	--	\$978.41

Table 6 - Calculation of Annual Burden for REO Youth and Adult for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	83	332	40 (per grantee)	\$24.15	\$80,178.00
State, Local or Tribal Government	82	328	40 (per grantee)	\$33.77	\$110,765.60
All Grantees	165	660	6,600	--	\$190,943.60
Avg. per Grantee	--		40	--	\$1,157.23

Table 7 - Calculation of Annual Burden for SCSEP for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	21	84	40 (per grantee)	\$24.15	\$20,286.00
State, Local, or Tribal Government	56	224	40 (per grantee)	\$33.77	\$75,644.80
All Grantees	77	308	3,080	--	\$95,930.80
Avg. per Grantee	--		40	--	\$1,245.85

Table 8 - Calculation of Annual Burden for YouthBuild for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	105	420	40 (per grantee)	\$24.15	\$101,430.00
State, Local or Tribal Government	105	420	40 (per grantee)	\$33.77	\$141,834.00
All Grantees	210	840	8,400	--	\$243,264.00
Avg. per Grantee	--		40	--	\$1,158.40

Table 9 - Calculation of Annual Burden for Apprenticeship for Joint Quarterly Narrative Performance Report

Type of grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	30	120	40 (per grantee)	\$24.15	\$28,980.00
State, Local or Tribal Government	150	600	40 (per grantee)	\$33.77	\$202,620.00
All Grantees	180	720	7200	---	\$231,600.00
Avg. per Grantee	---		40	---	\$1,286.67

Table 10 – Calculation of Combined Annual Burden for SCSEP Data Validation and Joint Quarterly Narrative Performance Report

Activity	Number of Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden Hours	Total Burden Hours	Hourly Wage Rate*	Total Burden Cost**
SCSEP Data Validation	77	4	308	40.5 hrs.	12,474	\$24.15/ \$33.77	\$388,519.74
Quarterly Narrative Performance Report	953	4	3,812	10 hrs.	38,120	\$24.15/ \$33.77	\$1,160,328.40
Unduplicated Totals	1,030		4,120		50,594		\$1,548,848.14

* The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For private non-profit grantees and Federally-recognized tribes, the hourly rate is the average hourly earnings in the civic and social organizations industry, CES code 80813400 (October 2020, CES survey, U.S. Census Bureau, <http://data.bls.gov/PDO/outside.jsp?survey=ce>). For state, county, and U.S.

territory government grantees, the hourly rate is the estimated average hourly earnings for employees in the administration of economic programs industry, NAICS code 926110 (CY 2019, Quarterly Census of Employment and Wages, Bureau of Labor Statistics, <http://data.bls.gov/pdq/querytool.jsp?survey=en>). Calculation was done by taking the average weekly earnings for all three levels of government and then divided that by 40 hours.

****Monetized Value of Respondent Time for SCSEP Data Validation includes a combined total of 21 respondents at \$24.15 hourly rate and 56 respondents at \$33.77 hourly rate (see Table 3). Monetized Value of Respondent Time for Quarterly Narrative Performance Report includes combined total of 330 respondents at \$24.15 hourly rate and 623 respondents at \$33.77 hourly rate (see Table 4).**

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).

a) Start-Up/Capital Costs: There are no start-up costs, as the Joint Quarterly Narrative Performance Report is developed using basic word processing software and submitted via existing web-based reporting systems or via email.

b) Annual Costs: There are no annual costs, as ETA is already providing access to the web-based reporting platforms as covered under separate Information Collection Requests or submission via the existing DOL email server.

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.

Federal costs are the staff costs required to review submissions of quarterly narrative performance reporting as outlined in Table 12 below. Costs for ETA staff to support SCSEP data validation and review quarterly narrative performance reports submissions will be \$170,297 per year for continuing operations.

Table 11 - Cost of SCSEP Data Validation and Quarterly Narrative Performance Review Reporting to Federal Government

Continuing Operations Per Year to Support SCSEP Data Validation and Quarterly Narrative Report Submission	
3 GS-13 in Region 1 (1/20 time)	\$15,390
3 GS-13 in Region 2 (1/20 time)	\$15,024

3 GS-13 in Region 3 (1/20 time)	\$14,562
3 GS-13 in Region 4 (1/20 time)	\$14,898
3 GS-13 in Region 5 (1/20 time)	\$15,328
3 GS-13 in Region 6 (1/20 time)	\$16,860
8 GS-13 in National ETA Office (1/20 time)	\$41,476
6 GS-14 in National ETA Office (1/20 time)	\$36,759
Total Cost	\$170,297

Note: Staff costs are based on the relevant locality pay for Salary Tables as available in the 2021 General Schedule (GS) Locality Pay Tables (Step 1 plus the locality pay areas for each regional office and the Washington-Baltimore-Northern Virginia, DC-VA-WV-PA region for the national ETA office staff), Department of Labor grade ranges are as of January 2021. See <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2021/general-schedule/>.

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

Senior Community Service Employment Program (SCSEP) Data Validation

There are no program changes from the previously approved SCSEP data validation.

Joint Quarterly Narrative Performance Report (Joint QNR)

For the WIOA Joint Quarterly Narrative Performance Report, this revision reflects the addition of the Apprenticeship grant program’s use of the instrument and updated grantee/respondent totals, associated burden hours and costs to align with the existing grant programs. The burden has increased due to the addition of the Apprenticeship grant program and the adjustment to other existing grant programs. More intensive data validation is now being provided through the WIOA performance reporting system, the *Workforce Integrated Performance System (WIPS)*.

Any updated rates shown on the burden calculation tables reflect the latest available GS Pay Scale tables and the latest BLS data which was updated since publishing of the 60-day FRN.

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.*

Senior Community Service Employment Program (SCSEP) Data Validation

SCSEP publishes the results of data validation in an annual validation report.

Joint Quarterly Narrative Performance Report (Joint QNR)

Grantees will submit the Joint QNRs on a quarterly basis to ETA through WIOA performance reporting system, *Workforce Integrated Performance System (WIPS)* or via email if no reporting system is provided, within 45 days of the end of each quarter. Quarterly report data will be analyzed by ETA staff and used to evaluate performance outcomes and program effectiveness.

Each quarter, ETA issues the Quarterly Workforce System Results. Data and other information contained in the Joint QNR may be included in these reports. The data may also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports, as needed.

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 will be displayed.

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.