

SUPPORTING STATEMENT
Form ETA-9189, TAA Administrative Collection of States (TAAACS)
OMB Control Number 1205-0540

Supporting Statement B, General Instructions:

Collections of Information Employing Statistical Methods

1. *Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used.*

This collection will be required of all State Workforce Agencies (SWAs) including Puerto Rico and the District of Columbia for a total of 52 respondents. SWAs are obligated to respond to the collection under the current Trade Adjustment Assistance (TAA) Governor-Secretary agreement and under Section 239(c) of Title II, Chapter 2 of the Trade Act of 1974, as amended (19 USC § 2271 et seq.). SWAs can be subjected to administrative findings for failure to respond. Because this collection is new, a previous response rate cannot be reported. During the first two collection rounds, the response rate was 99% with only one territory failing to provide a response during the first round. We expect a the response rate of between 98% and 100% to continue.

2. *Describe the procedures for the collection of information.*

No statistical sampling method is employed because responses are needed from all states to evaluate the effectiveness of state organization. The collection will be employed annually due to near constant revisions of the organization of SWAs in operating the TAA program. New models for service delivery are being employed, which requires the tracking of progress in new models over time.

3. *Describe methods to maximize response rates and to deal with issues of non-response.*

The Department sends periodic reminders to each non-responsive SWA and discuss the need for timely submission of information. The Department will establish a deadline not less than four weeks after the transmission of the PRA collection by which SWAs must respond. In the unlikely circumstance where a SWA continues to be non-responsive, SWAs may be subject to findings during normal grant monitoring.

For data that is not provided in response to the PRA collection, the Department will first seek for the SWA to remedy their non-response to questions as complete and accurate responses are required under the obligations stated above. During the initial two rounds of collection, 100% of the seven (7) incomplete collections were remedied. In statistical evaluation, the Department will use case wise deletion of records rather than imputation.

4. *Describe any tests of procedures or methods to be undertaken.*

After each annual collection is conducted, the Department will evaluate the responses provided to identify questions that (1) are shown to be difficult for a SWA to answer, (2) result in large amounts of inaccurate or blank reporting, (3) are not helpful for examining state performance or effectiveness, or (4) are not helpful to the identification of best practices or monitoring of the program. Based on this evaluation, questions that do not yield value in understanding state best practices will be modified or removed in future versions of the collection. Following this process, this revision removes or revises a number of questions on staffing, integration, and IT systems. Furthermore, four multi-part questions required an SWA to provide a ranking of the subparts. This ranking was found to be burdensome and thus the collection is being revised to change these to ratings rather than rankings.

The Department will examine data across the eight established collection categories to identify if there is co-variance between these various aspects of SWA organization and measures of state performance and effectiveness such as petition filing rates and expenditure data collected on the TAA program. This includes identifying both SWA attributes as well as identifying areas where there is a perception of difficulties or inefficiencies in program operations. Some examples of questions to be explored through analysis are:

- a. Is the implementation of TAA navigators (staffing model) related to higher numbers of petition filings?
- b. Is centralized reporting or program-specific reporting related to difference in numbers of participant data errors?
- c. Which outreach methods are associated with higher rates of contact between eligible worker groups and SWAs?
- d. What training methodologies for case managers are associated with participant higher participant outcomes?
- e. Which mechanisms for inter-office coordination in the SWA are associated with best resolving data issues related to performance/fiscal alignment and co-enrollment?
- f. Are electronic tools associated with higher case management rates or participant outcomes?
- g. Is the offering of job search and relocation benefits at particular times in the participant cycle associated with high utilization rates of those benefits?

Additionally, the information provided through this collection will help to identify states with unique service delivery models, provide information on state organization to optimize the delivery of technical assistance to SWAs, and aid the Department in prioritizing initiatives to overcome SWA barriers to service delivery that are both real and perceived.

The establishment of this new collection is part of an initiative to use data-driven decision-making to improve service delivery, improve efficiency, and accurately prioritize Department resources in delivering sustainable support for SWAs administering the TAA program.

5. *Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.*

TAAACS was created and revised in consultation with DOL regional monitoring staff, input from SWAs implementing the TAA Program, and after reviewing prior evaluations conducted on

the TAA program. Similarly, the first two collections were analyzed to identify appropriate changes to minimize burden and increase effectiveness. Through these consultations, TAAACS targets information that had been previously identified as likely indicators of proper program administration and basic information needed to provide appropriate technical assistance while focusing on information identified by SWAs as readily available to minimize burden. No other persons were consulted on the statistics aspects of the design of this collection. The collection will be conducted and analyzed by Robert Hoekstra (202-693-3522, hoekstra.robert@dol.gov) in the Office of Trade Adjustment Assistance (OTAA) and may be used to help evaluate the TAA program by external evaluators.