

SUPPORTING STATEMENT FOR YOUTHBUILD REPORTING SYSTEM

OMB CONTROL NO. 1205-0464

This ICR seeks to extend the reporting and recordkeeping requirements of the YouthBuild program.

This standardized data collection for program participants is completed by YouthBuild grantees through the use of a web-based case management system. YouthBuild grantees provide quarterly performance data, including aggregate and participant-level information on demographic characteristics, types of services received, placements, outcomes, and follow-up status through a web-based case management report (ETA-9136) using approved data elements (ETA-9138). This report collects data on individuals who receive education, occupational skills training, leadership development services, and other services essential to preparing at-risk youth for in-demand occupations through YouthBuild programs.

The Work Site Description portion of ETA-9143 is completed as part of each grant application, and then on an as-needed basis by YouthBuild grantees, as they propose new work sites for training participants in construction skills. The Annual Housing Census portion of ETA-9143 is completed once annually by YouthBuild grantees to provide information on the number of affordable housing units built or renovated by YouthBuild participants. There are changes proposed to ETA-9143 that do not affect burden collection in this information request package.

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 that ETA receives.

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.

The YouthBuild program is authorized under the Workforce Innovation and Opportunity Act of 2014 (PL 113-128), also known as WIOA, which identifies performance accountability requirements for these grants. YouthBuild is designed to: enable disadvantaged youth to obtain the education and employment skills necessary to achieve economic self-sufficiency in occupations in post-secondary education and high-demand training opportunities; provide disadvantaged youth with opportunities for meaningful work and service to communities; foster

the development of employment and leadership skills and commitment to community development among youth in low-income communities; and expand the supply of permanent affordable housing for homeless individuals and low-income families by utilizing the energies and talents of disadvantaged youth.

YouthBuild assists youth who are often significantly behind in basic skills in obtaining a high school diploma or state-recognized equivalency. In YouthBuild, unemployed and undereducated young people ages 16-24 work toward their high school diploma or state-recognized equivalency degree while learning job skills by building affordable housing for homeless and low-income people. The primary target populations for YouthBuild are low-income youth, adjudicated youth, youth aging out of foster care, out-of-school youth, and other at-risk populations. The reporting and recordkeeping system incorporates each of these aspects, which are necessary for program evaluation.

WIOA identifies six performance indicators for all Title I programs: placement into unsubsidized employment in the second quarter after exit (and for youth, also into post-secondary education or training); placement into unsubsidized employment in the fourth quarter after exit (and for youth, also into post-secondary education or training); Median Earnings in the second quarter after exit; Credential Attainment; Measurable Skill Gains; and Effectiveness in Serving Employers. ETA provides web-based case management applications for the collection and reporting of these indicators, which grantees currently report into the ETA-9136 YouthBuild Quarterly Performance Report, using the ETA-9138 data elements, while the new WIOA-compliant Grant Performance Management System is still under development. Once GPMS is completed, new YouthBuild grantees will begin using that system and the ETA-9136 and ETA-9138 will eventually be sunset as current grantees complete their grant periods of performance. Until such time, we are requesting approval extension for these forms currently authorized under this OMB approval. The extension on this ICR which relates to ETA-9136 and ETA-9138 is to ensure the completion of performance reporting for these grants.

Pub.L. No. 113-128, Sec 185(d) (The Workforce Innovation and Opportunity Act) broadly addresses reports, recordkeeping, and investigations 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 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 that the reports shall include information about programs and activities carried out under Title I pertaining to:
 - relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants;
 - programs and activities in which participants are enrolled, and the length of time that participants are engaged in such programs and activities;
 - outcomes of the programs and activities for participants, including the occupations of participants and placement for participants in nontraditional employment;
 - specified costs of the programs and activities; and
 - information necessary to prepare reports to comply with section 188 and 29 CFR Part 37.37 [(a-b),(d-e)]; and,
- 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.

Pub.L. No. 113-128, Sec 189(d) (The Workforce Innovation and Opportunity Act) requires the Secretary to prepare and submit to Congress an annual report regarding the programs and activities carried out under Title I. The report must include:

- A summary of the achievements, failures and challenges of the programs and activities in meeting the objectives of Title I;
- A summary of major findings from research, evaluations, pilot projects, and experiments conducted under Title I in the fiscal year prior to the submission of the report;
- Recommendations for modifications in the programs and activities based on analysis of such findings; and
- Such other recommendations for legislative or administrative action as the Secretary determines to be appropriate.

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.

Grantees implement recordkeeping and reporting requirements with grant funds. As a government-procured web-based management information system (MIS) is provided to all grantees, their implementation costs are minimal. Grant funds are also used with the prior approval of the grant officer to upgrade computer hardware and Internet access to enable projects to use the MIS.

Grantees enter data into the MIS on individuals who receive services through YouthBuild programs. The Department and ETA will use this data to evaluate performance and delivery of

YouthBuild program services. The MIS allows grantees to collect additional participant data beyond those elements required for performance reporting. ETA uses the data to track total participants, characteristics, services, and performance indicator outcomes for YouthBuild participants. The MIS supports ETA's ability to assess the effectiveness of the YouthBuild program within the broader youth public workforce system.

Within ETA, the data are used by the Offices of Workforce Investment, Financial and Administrative Management, Policy Development and Research, and Field Operations (including the regional offices). Other DOL users include the Offices of the Assistant Secretary for ETA and Assistant Secretary for Policy.

The reports and other analyses of the data are available to the public through publication and to the appropriate congressional committees through copies of such reports. In addition, data obtained through the MIS is used at the national level during budget and allocation hearings for DOL compliance with the Government Performance and Results Act (GPRA) and other legislative requirements, and during legislative reauthorization proceedings.

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, a web-based Case Management System with data elements and data definitions are provided to the grantees by ETA. All YouthBuild data and reports are submitted to ETA via the Internet. Grantees collect, retain, and report all information electronically through the ETA-provided MIS.

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 A.2 above.

ETA has minimized the reporting burden of ETA-9136 and ETA-9138 by establishing the number of data elements required commensurate with the level of resources expended and services received. Data items collected by program reports and individual records are needed to: (1) account for the detailed educational, occupational skill training, post-secondary planning and placement, and leadership services and activities provided by YouthBuild program grantees to help at-risk youth participants get and keep well-paying jobs; (2) better identify overlapping and unproductive duplication of services; and (3) reduce the effect of stove-piped data and generate performance information across employment and training programs. Information provided through the YouthBuild MIS is not available through other data collection and reporting systems.

ETA-9143 is the result of a unique component of the YouthBuild program model which statutorily requires that programs engage in construction training on low-income work sites that provide sufficient hands-on experience to ensure youth participants have the skills to then

succeed in subsequent construction career pathways. ETA-9143 documents these low-income work sites to ensure compliance with Uniform Guidance on allowable costs on construction projects and the statutory requirements for construction training, while also allowing ETA to gather information on the impact of the program in increasing the supply of affordable housing.

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. 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.

2 CFR 200.328(b)(1), which governs monitoring and reporting program performance under grants and agreements with non-Federal entities, states that the non-Federal entity must submit performance reports at the interval required by the Federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. In applying for YouthBuild grants, grantees agree to meet ETA's reporting requirements as indicated in the annual Funding Opportunity Announcement (FOA) which requires the submission of quarterly reports within 45 days after the end of the quarter. As well, the FOA requires that grantees demonstrate past performance, and this is accomplished for previous DOL-funded YouthBuild grantees through a review of the performance data submitted in the MIS. The FOA also requires that grantees report on intended construction work sites and the outcomes of those projects. If ETA did not comply with these requirements, funding for discretionary grant programs would be compromised.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **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 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.**

There are no special circumstances that would require further explanation of the collection of information from the respondents.

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 January 4, 2021 (86 FR 145). We received one non-substantive comment.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

Respondents receive no payments other than the grant funds described in the annual Funding Opportunity Announcement.

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 protecting the confidentiality of the YouthBuild participant and performance data. The case management system includes a link to the Privacy and Security Statement on the front page. ETA 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. The Department ensures the highest level of security whenever personally identifiable information is stored or transmitted. All internal users who have access to the system can only log in from within the DOL network, therefore assuring a secure network. Additionally, all contractors that have access to individually identifying information are required to provide assurances that they will respect and protect the confidentiality of the data. DOL's Office of the Chief Information Officer has been an active participant in the development and approval of data security measures – especially as they apply to the web-based MIS.

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.

While the proposed data collection asks participants sensitive questions, the confidentiality of participants is protected as discussed in section A.10. In addition, the MIS contractor builds security into the data collection system. Participant responses to these sensitive questions allow ETA to comprehensively evaluate the effectiveness of the YouthBuild program.

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.**

- **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 in Item 14.**

The annual national burden for the YouthBuild reporting system has three components: (1) the participant data collection burden; (2) the quarterly performance report burden; and (3) the work site description and annual housing census burden. This response provides a separate burden for each of the three components. Each component includes record keeping.

(1) Participant Data Collection Burden, ETA-9138

The YouthBuild **participant data collection burden** considers the amount of participant and performance-related information collected and reported on the participant record 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 solely to comply with the federal reporting requirements.

The data collection burden will vary by participant based on the range and intensity of services provided by the grantee as well as by the number of participants served.

Estimated Annualized Respondent Cost and Hour Burden

Activity	PY 21 Estimated National No. of Respondents	No. of Records per Participant	Total Responses	Average Burden Hrs. Per Record (Hours)	Total Burden (Hours)	Hourly Wage Rate	Annual National Total Burden Cost
Participant MIS Records	6,000	1	6,000	1.8	10,800	\$16.33	\$176,364

(2) Quarterly Performance Report Burden, ETA-9136

The quarterly performance report burden assumes that all grantees will use the ETA-provided MIS to generate quarterly performance reports. The MIS applies edit checks to participant data and generates facsimiles of the aggregate information on enrollee characteristics, services provided, placements, outcomes, and follow-up status in quarterly report format. 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.

Activity	No. of Grantees	No. of Responses Per Year Per Grantee	Total Responses Per Year	Average Burden (Hours)	Annual National Total Burden (Hours)	Hourly Wage Rate	Annual National Total Burden Cost
Quarterly Performance Report	210	4	840	16	13,440	\$16.33	\$219,475.20

(3) Work Site Description, ETA-9143

- A. Work Site Description: As part of the grant application, prospective applicants are required to submit information about the work site(s) that will be used as training for YouthBuild participants using the Work Site Description form. Grantees are also required to submit this form at any point when they propose to utilize an additional work site during the period of performance to guarantee that the grantee has access to a suitable and qualifying work site property to use in the training of YouthBuild participants. They must submit unique forms for each work site proposed. This form includes information on estimated construction costs and sources of funding. The burden is estimated at 30 minutes per submission with one submission per prospective applicant; this burden, annualized over the three-year period of this request for extension, is 10 minutes per year.

Prospective Applicants

Activity	Average No. of Applicants *	Average Annual No. of Responses per Respondent	Total Responses	Average Annualized Hrs. Per Year Per Prospective Applicant Burden (Hours)	Annual National Total Burden (Hours)	Hourly Wage Rate	Annual National Total Burden Cost
Work Site Description	230	1	230	.17	39.1	\$16.33	\$638.50

*Based on the average number of applications received in ETA's last three YouthBuild competitions.

ETA estimates that grantees will submit three work site forms over the course of the two years of active program services for each grant period of performance. The burden is estimated at 30 minutes per submission with three submissions per grantee; this burden, annualized over the three-year period of this request for extension, is 30 minutes per year.

Existing YouthBuild Grantees

Activity	No. of Grantees	Annualized No. of Responses per Grantee	Total Responses	Annualized Average Burden (Hours)	Annualized Total Burden (Hours)	Hourly Wage Rate	Annual Total Burden Cost
Work Site Description	210	1	210	.5	105	\$16.33	\$1,714.65

B. Housing Census Form: Grantees are required to submit information on the number of houses or apartments built or renovated by YouthBuild participants on an annual basis. The burden is estimated at 30 minutes annually.

Activity	No. of Grantees	Annualized No. of Responses per Grantee	Total Responses	Annualized Average Burden (Hours)	Annualized Total Burden (Hours)	Hourly Wage Rate	Annual Total Burden Cost
Housing Census Form	210	1	210	.5	105	\$16.33	\$1,714.65

TOTAL

Activity	Number of Respondents	Number of Responses per Respondents	Total Responses	Annualized Average Burden (Hours)	Annualized Total Burden (Hours)	Hourly Wage Rate	Annual Total Burden Cost
Participant Data Collection	6,000	1	6,000	1.8	10,800	\$16.33	\$176,364.00
Quarterly Performance Report	210	4	840	16	13,440	\$16.33	\$219,475.20
Work Site Description (Prospective Applicants)	230	1	230	.17	39	\$16.33	\$638.50
Work Site	210	1	210	.5	105	\$16.33	\$1,714.65

Description (Existing Grantees)						3	
Housing Census Form	210	1	210	.5	105	\$16.3 3	\$1,714.65
Unduplicat ed Totals	6, 860		7,490		24,489		\$399,907. 00

*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 U.S. Bureau of Labor Statistics social assistance industry category (July 2020, Current Employment Statistics Survey, U.S. Bureau of Labor Statistics). Source: https://www.bls.gov/web/empsit/ceseeb8a.htm#ce_ee_table8a.f.2

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3)**

for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

- a) **Start-up/capital costs:** There are no start-up costs, as ETA provides grantees with a free, web-based, data collection and reporting system that grantees use to collect and maintain participant data, apply edit checks to the data, and generate the quarterly reports.
- b) **Annual costs:** There are no annual costs, as ETA covers the annual maintenance costs for the free, web-based, data collection and reporting system.

14. Provide estimates of the 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), 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 into a single table.

There are no costs to the Federal Government.

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

The decrease in the overall burden is due to grantees increasing their focus on the Construction Plus component of the program. Grantees are now averaging three work site forms over the course of two years of active program services.. Thus, taking 10 minutes each to fill out, 30 minutes throughout the life of the grant.

16. For collections of information whose results will be published, outline plans for tabulations, 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.

Grantees submit narrative progress and MIS performance reports on a quarterly basis to ETA within 45 days of the end of each quarter. ETA staff use quarterly report data to evaluate performance outcomes and program effectiveness.

Each year, ETA issues an annual report summarizing program performance based on the Secretary's goals. Data contained in the YouthBuild QPR may be included in these reports. The data will also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports. All reports are available on the internet and accessible to the public.

Product	Submission Date	Comments
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Quarterly Performance Report	Within 45 days after the end of the quarter.	Quarterly progress reports and performance data will be submitted electronically using the YouthBuild MIS.
Work Site Description	Prospective Applicants: Submit with grant application. Existing Grantees: Submit an average of three additional Work Site Description forms during the life of the grant.	Work Site Descriptions will be submitted electronically by both the prospective applicants and existing grantees.
Annual Housing Census	Annually within 45 days of the end of the annual reporting period.	Annual Census reports will be submitted electronically.

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.

ETA is not seeking approval to conceal the OMB Expiration Date.

18. Explain each exception to the certification statement.

No exceptions are requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.