

ATTACHMENT A
SUPPORTING STATEMENT FOR
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

OMB CONTROL NUMBER 1205-0040

This information collection request (ICR) seeks to fulfill the statutory requirements for SCSEP data collection by improving ETA's ability to collect grantee performance data, including information on participant characteristics and outcomes; document the equitable distribution of SCSEP services; assess customer satisfaction with the program; and ensure that states are reporting on the program more efficiently as part of the State Plan and annual grant planning processes.

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 contains information relating to, and includes revisions for the State Plan, Annual Grant Planning and Allotment Requirements, and the Performance Accountability reporting for the Senior Community Service Employment Program (SCSEP). This is a request to: 1) update and add data elements, code fields, and revised instructions to the existing and new ETA web-based reporting systems (the legacy SCSEP Performance and Results Quality Performance Report (SPARQ) and the new Grant Performance Management System (GPMS)); 2) revise and combine information collection (currently collected through ETA-9120 – Participant Form, ETA-9121 – Community Service Assignment Form, ETA-9122 – Exit Form ETA-9123 – Unsubsidized Employment Form) into one data collection instrument – Form ETA-9191; 3) make minor updates to the SCSEP's customer satisfaction survey collection instruments (ETA-9124A– Participant Survey and ETA-9124B– Host Agency Survey); 4) revise the response requirement in the SCSEP Four-Year State Plan to add information on overall SCSEP project operations and administration; 5) renew the Equitable Distribution Forms and include the Equitable Distribution Report as part of the annual guidance to eliminate duplication; and 6) amend the information that the Department requires grantees to certify and/or submit on a quarterly, annual, biennial, or as-needed basis (per Sections 513 and 514 of the Older Americans Act and 20 CFR 641.700, 879(b)), including revisions to ETA-5140 – SCSEP Quarterly Progress Report, used with SPARQ.

The SCSEP, authorized by title V of the Older Americans Act (OAA) and most recently reauthorized in 2020, is the only federally-sponsored employment and training program targeted specifically to low-income, older individuals who want to enter or reenter the workforce. The program provides subsidized work experience training for low-income

persons 55 or older who are unemployed and have poor employment prospects. SCSEP national grants are awarded through a competitive process; state and territorial grants are awarded through a formula outlined in the OAA Section 506 (b-c). The dual goals of the program are to promote useful community service employment activities and to move SCSEP participants into unsubsidized employment so that they can achieve economic self-sufficiency.

The Department of Labor, through the Employment and Training Administration or ETA, is required to collect the information described below in order to comply with the OAA statutory and regulatory requirements. The information is also necessary for grantees' performance accountability and program management. Table 1 at the end of this section provides a reference by topic for each collection instrument used in this information collection and the related statutes and regulations.

Performance Accountability

SCSEP grantees must submit data on participants (including demographics, characteristics, services received, and outcomes), host agencies, and employers in an electronic format specified by the Department. The Department generates SCSEP Quarterly Performance Reports (QPR), as well as a final QPR annually, after receipt of the data (OAA Sections 513-514 and 20 CFR 641.700-740).

The OAA reauthorization of 2016 amended the SCSEP performance measures, implemented in the 2018 Final Rule (<https://www.federalregister.gov/documents/2018/07/30/2018-16216/senior-community-service-employment-program-performance-accountability>). The 2020 reauthorization of the Older Americans Act, the Supporting Older Americans Act of 2020 (Pub.L. 116-131), made an addition to the populations entitled to priority in enrollment. Specifically, formerly-incarcerated individuals released or on supervision after release within the past five years are now a priority of service population for SCSEP and are eligible for individual durational limit extensions; data collection changes associated with this change are included in this PRA package.

This PRA package seeks to revise the information that the Department requires grantees to certify and/or submit on a quarterly, annually, biennially, or as-needed basis. This information collection request (ICR) will:

- Revise the existing SPARQ data collection instruments - ETA-9120 – Participant Form, ETA-9121 – Community Service Assignment Form, ETA-9122 – Exit Form, ETA-9123 – Unsubsidized Employment Form - for use until such time as SPARQ is replaced by the GPMS;
- Combine the four existing SPARQ data collection instruments (ETA-9120 – Participant Form, ETA-9121 – Community Service Assignment Form, ETA-9122 – Exit Form, ETA-9123 – Unsubsidized Employment Form) with those data elements that are incorporated into the new GPMS, and additional data elements newly developed for SPARQ and GPMS and not previously approved, as a single data instrument, the GPMS Data Collection Instrument, which will be used once the GPMS is implemented and replaces SPARQ;

- Revise the Equitable Distribution Report Forms and include the Equitable Distribution Report as part of the annual grant planning guidance process to eliminate duplication;
- Remove Forms ETA-9180A (Negotiation Calendar Template) and 9180B (State or Substate Data Goal Negotiations);
- Remove Forms ETA 9182A (Release and Authorization Photography and 9182B (Consent for Use and Publication of Information);
- Revise Form ETA-9181 (Instructions for Discretionary Transfers) adding the control number and removing date specificity.
- Revise SCSEP’s survey collection instruments: ETA-9124A– Participant Survey and ETA-9124B– Host Agency Survey; no changes are requested to ETA-9124C – Employer Survey at this time; and
- Facilitate SCSEP’s transition to the new GPMS described below.

One of the core performance measures that the OAA-2016 requires the Department to report on is “Indicators of effectiveness in serving employers, host agencies, and participants,” which partially aligns with the WIOA measure, “effectiveness in serving employers.” This is similar to the previous SCSEP measure for “Satisfaction of the participants, employers, and their host agencies with their experiences and the services provided” that was included as an “Additional Measure” in the 2006 OAA sec. 513(b)(2); [42 U.S.C. sec. 3056k(b)(2)] these additional measures were outside of the core measures and, therefore, not subject to goal-setting and corrective actions. ETA captures this performance measure by administering customer satisfaction surveys to each of these customer groups. As stated in the SCSEP Final Rule, ETA will continue to use the existing customer satisfaction surveys (with some updates to the collection instruments) to report the American Customer Satisfaction Index (ACSI) score to meet this statutory requirement [OAA Section 513(b)(1)(E); 42 U.S.C. sec. 3056k(b)(1)(E) and 20 CFR 641.700 and 710].

The Department is proposing revisions to two of the three surveys: ETA-9124A– Participant Survey and ETA-9124B– Host Agency Survey; no changes are requested to ETA-9124C – Employer Survey at this time.

In order to facilitate an integrated performance reporting system that provides aggregate data, ETA has developed the Workforce Integrated Performance System (WIPS) – an electronic performance reporting system for the Department’s employment and training grants— and is currently developing the GPMS for SCSEP, which will be the data collection portal that feeds into WIPS for the generation of QPRs. These combined systems will replace SPARQ. ETA estimates SCSEP’s transition to these new systems to occur by the end of PY 2021 and expects grantees to begin reporting and generating performance reports solely via the new systems soon thereafter.

SCSEP grantees report on the seven performance measures required in the SCSEP Final Rule on Performance Accountability, described previously, in their QPRs. These seven measures are: service level; community service; service to most in need; common measures employment rate – 2nd quarter after exit; common measures employment rate – 4th quarter after exit; common measures median earnings; and effectiveness in serving employers,

participants, and host agencies. The QPR provides grantees a snapshot of their program outcomes as required by the OAA-2016. The QPR is automatically generated by SPARQ currently and, after transition, will be automatically generated through WIPS.

SCSEP grantees currently collect the participant-level information through SPARQ and will eventually collect this information through the new GPMS. Elements needed for this new system are included in this ICR. In May 2017, ETA moved many of SCSEP's performance-related data elements into OMB control number 1205-0521 (DOL-Only Performance Accountability, Information, and Reporting System) as part of its effort to streamline program performance reporting across ETA. The SCSEP performance-related data elements approved under that control number that have been incorporated into the GPMS are now being consolidated under this OMB Control Number, 1205-0040, along with the data elements previously approved under this collection and some additional data elements now required for SPARQ and the new GPMS. The consolidation of all GPMS data elements under this one information collection request will minimize confusion and facilitate future additions and revisions to the GPMS based on programmatic needs and user feedback. After review and approval of this ICR, ETA anticipates updating the data collected under OMB control number 1205-0521 accordingly.

ETA uses the new GPMS data elements to record information about SCSEP participants and to measure grantees' progress toward OAA-2016 requirements. As part of this revision request, updates have been made to the GPMS Data Collection Instrument to comply with OAA-2020 and accommodate the ETA modernization effort. ETA is submitting the GPMS Data Collection Instrument in an Excel document in order to align the format with OMB Control Number 1205-0521 and to have all SCSEP data elements in one document. After the SCSEP GPMS development is completed, ETA may create a form version of the approved GPMS Data Collection Instrument for SCSEP grantees to use in the field to collect data. The hard-copy form version of the approved SCSEP data elements will be useful when collecting data in areas where access to technology is limited or unavailable (e.g., in rural communities).

State Plan

In order to receive SCSEP funds, the OAA-2016 requires the Governor of each state, or his or her designee, to submit a plan as an independent document (stand-alone) or as part of the WIOA Combined State Plan. The plan outlines a four-year strategy (and a two-year modification of this strategy) for the statewide provision of community service employment and other authorized activities under the SCSEP. Every four years, the Department issues a SCSEP State Plan Requirements Training and Employment Guidance Letter (TEGL). Using the TEGL, the Department requests states, in consultation with national grantees that operate in their states, to describe economic projections and impact, service delivery and coordination with other programs, and the locations and populations served, taking into account the current relative distribution (described more fully below) of eligible individuals and employment opportunities within the state. Additionally, the Department requires the states to describe their SCSEP operations relating to performance management, training, community service assignments, placements into unsubsidized employment, and collaboration with the workforce system to maximize opportunities for

SCSEP participants to obtain training and supportive services. Two years after the State Plan Requirements TEGL is issued, the Department issues a State Plan Modification TEGL requiring grantees to review their plans and submit any updates (OAA-2016 Section 503(a) and 20 CFR 641.300-370) to the original four-year State Plan submission. The Department previously updated the State Plan collection instrument biennially to clarify program and submission requirements for the upcoming submission. This request is to standardize the state plan and state plan modification guidance to ensure consistency with both the WIOA Combined Plan and SCSEP Stand-Alone Plan submissions.

In order to eliminate duplicate requests for these requirements in both the state plan and annual grant planning guidance, and to provide grantees with more flexibility, we are requesting to add to the State Plan requirements a section that requests the grantees to provide specific information about the operation and administration of their program and provides grantees the opportunity to update this information in the annual grant plan or the State Plan two-year modification, as appropriate. This will eliminate the requirement that grantees report essentially the same information in both the State Plan and annual grant plan submissions, as often happens now. (SCSEP State Plan and Two-Year Modification Guidance.)

Pursuant to the Supporting Older Americans Act of 2020, which reauthorized the OAA (OAA-2020, Pub.L 116-131), the required content of the State Plan will be amended to include the relative distribution of eligible individuals who have been incarcerated within the last five years or are under supervision following release from prison or jail within the last five years.

Annual Grant Planning and Allotment Requirements

The SCSEP is comprised of state, territorial, and national grantees. The funding for individual state and territorial grantees is determined solely by statutory formula; these funds are renewed annually and are allocated by a formula set forth in Section 506 of the OAA. The funding for individual national grantees is determined through a competitive Funding Opportunity Announcement and award process, available to national non-profit organizations every four years (subject to annual appropriations), with an optional one-year extension at the Department's discretion.

The Department releases a grant planning TEGL each spring to provide SCSEP grantees with funding and authorized position amounts; instructions for preparing their budgets; and document submissions for the annual grant renewal based on the OAA Title V appropriation (OAA Sections 502 and 506 and 20 CFR 641.400-495). The Department updates the Annual Grant Planning and Allotment collection instrument annually to clarify program and submission requirements for each request. In particular, the Department asks grantees to provide information in a program narrative describing the operation of the grant, which includes administration, recruitment, income eligibility determinations, assessments, and processes for choosing community service assignments.

Part of the statutory requirement for the annual grant planning includes grantee submissions for Optional Special Requests. The possible Optional Special Requests for

which grantees may seek approval are: reduction of the required 75 percent of grant funds for participant wages and fringe benefits in order to provide additional training and supportive services to participants; increase of the allowable administrative costs from 13.5 percent to 15 percent; engaging participants in On-the-Job Experiences; increase of the allowable maximum average project duration from 27 months to 36 months; allowing cross-state border agreements; and employing a host agency rotation policy for participants consistent with their Individual Employment Plans.

ETA is reducing the paperwork burden for this ICR by moving the request relating to describing SCSEP grant operations solely to the State Plan (for state and territory grantees) and to responses to the Funding Opportunity Announcement (FOA) submitted by national grantee applicants. The annual planning requirement would be used only to update the information provided in State Plan submissions and FOA responses, as applicable. ETA will still require grantees to respond to the annual grant planning and allotment requirements by submitting: 1) an explanation of the findings of the statutorily-required Minority Report 2) signed Programmatic Assurances; and 3) updated Optional Special Requests (see TEGP No. 20-20), all of which must be re-submitted and re-approved each year. ETA will also use the annual grant planning and allotment requirements to transmit the Equitable Distribution (ED) Report (ETA-8705A and 8705B) requirements for the upcoming program year. Combining the ED Report with the annual grant planning process will enable grantees to make any needed adjustments in their recruitment and service strategies before the beginning of the new program year.

Table 1 below provides a cross-reference for each required information collection topic, the related collection instruments, and the relevant statutes and regulations.

Table 1: Collection Instruments

	<i>COLLECTION INFORMATION</i>	<i>LEGISLATIVE CITATIONS OAA</i>	<i>REGULATORY CITATIONS</i>
State Plan	Four-Year SCSEP State Plan Requirements Guidance	Section 503(a); Section 514(e); 518(a)	20 CFR 641.300-370
	Two-Year (Modification) SCSEP State Plan Requirements Guidance	Section 503(a)	20 CFR 641.340-370
Equitable Distribution Report	ETA-8705A and ETA-8705B	Sections 507(a), - (b) and 508	20 CFR 641.325(a), 360, 365, and 879(c)
	ETA 9181 Instructions for Discretionary Transfers		20 CFR 641.365(e)
Grant Planning and Allotment	Planning Instructions and Allotments for SCSEP (annual Training and Employment	Sections 502, 506 and 515	20 CFR 641.400-495

Requirements	Guidance Letter)		
Performance Accountability	SCSEP Quarterly Progress Report (ETA-5140)	Sections 513 and 514	20 CFR 641.700-740, 879(b),(d), (e), and (h)
	GPMS Data Collection Instrument (ETA-9191)	Sections 500-518	20 CFR 641.500-740 and 879(b)
	SPARQ Data Collection Forms ETA-9120, ETA-9121, ETA-9122 and ETA-9123	Sections 501-518	20 CFR 641.500-740 and 879(b)
	Customer Satisfaction Surveys (ETA-9124A, ETA-9124B, and ETA-9124C)	Sections 513(b)(1)(E)	20 CFR 641.700-740

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.*

Performance Accountability

The system-generated QPRs support SCSEP’s performance accountability. ETA uses the QPR information to manage the program and to report program results to the public and to Congress. If the Department determines that a state failed to meet the expected levels of performance (reported on the final QPR) for three consecutive years, the Department will require that state to conduct a competition and will reallocate the grantee’s funding to another entity (OAA Section 513(d)(3)(B)(iii)). National grantees that fail to meet the expected levels of performance for four consecutive years will not be allowed to compete in the subsequent grant competition but may compete in the next grant competition after that subsequent competition (OAA Section 513(d)(2)(B)(iii)). When necessary, ETA uses the QPR information to initiate these actions. ETA also reviews QPRs to determine whether grantees are required to submit corrective action plans or need technical assistance in meeting their agreed upon performance goals. In this ICR, ETA is renewing the existing SPARQ QPR (ETA-5140) with one substantive change: in order to implement the statutory changes in OAA 2020, we have added the required data element for formerly-incarcerated individuals in Section D, Participant Characteristics, subsection Additional Measures (SCSEP Quarterly Progress Report - ETA-5140).

This submission also renews, with revisions, the four current SPARQ data collection instruments for use until such time as SPARQ is replaced by the GPMS. The revisions are as follows:

- ETA-9120 – Participant Form - adds the two new fields for previously incarcerated individuals

- ETA-9121 – Community Service Assignment Form - adds hours of paid sick leave
- ETA-9122 – Exit Form - renews without revisions
- ETA-9123 – Unsubsidized Employment Form - relabels and renumbers the three fields for entering follow-up information

(See SPARQ Forms)

When the GPMS is implemented, grantees will collect data listed in the four existing SPARQ data collection instruments (ETA-9120 – Participant Form, ETA-9121 – Community Service Assignment Form, ETA-9122 – Exit Form, ETA-9123 – Unsubsidized Employment Form), data elements approved under Control No. 1205-0521 that are incorporated into the new GPMS, and additional data elements newly developed for SPARQ and GPMS and not previously approved through a single spreadsheet. This spreadsheet, the GPMS Data Collection Instrument, will be used when the GPMS is implemented and replaces SPARQ. The new GPMS Data Collection Instrument will record participant-level information about SCSEP program participants and will measure grantees' progress toward OAA requirements. Grantees will use this information to generate reports and support the day-to-day management of their grants. (See GPMS Data Collection Instrument.)

ETA utilizes the existing Customer Satisfaction Surveys (ETA-9124A, ETA-9124B, and ETA-9124C) to gather required information on the new core performance measure, "Indicators of effectiveness in serving employers, host agencies, and participants." ETA has conducted these surveys nationwide since 2004. The survey approach allows the program flexibility and, at the same time, captures common customer satisfaction information that can be aggregated and compared among national and state grantees. The measure is created with a small set of core questions that form the American Customer Satisfaction Index (ACSI). The index is created by combining scores from three specific questions that address different dimensions of customers' experiences. Additional questions that do not affect the assessment of grantee performance are included to assist grantees to effectively manage the program. ETA uses the ACSI scores to calculate grantees' performance on this measure, which is reported on their final QPRs. (See ETA-9124A, ETA-9124B, and ETA-9124C.)

Equitable Distribution Report

Equitable Distribution compares the allocation of SCSEP positions as determined by Census data to the current enrollment of participants by the grantees. The differences between the official allocation of positions and the actual enrollment of participants form the basis for a portion of the State Plan activity. State grantees use the data in this report to prepare their State Plans, and ETA uses the data to determine how close grantees are to achieving equitable distribution and to provide technical assistance when necessary. This system-generated information is also used by state and national grantees annually to prepare the Equitable Distribution Reports, as described below.

The Equitable Distribution Report has been used by the program for over 20 years. It was substantially revised in PY 2015 to take advantage of the automation of equitable distribution data. The report consists of system-generated data and provides grantees the

number of allocated positions by county, the number of current enrollments by county, and the variance between the two. The Equitable Distribution Report remains a requirement under Section 508 of OAA, which calls for states, in conjunction with national grantees operating in the state, to submit a report that details an equitable allocation of SCSEP resources within the state based on county-by-county data showing the number of SCSEP-eligible persons in the population, as derived from the most recent U.S. Census. The report shows whether areas are being served equitably rather than being underserved or overserved. Grantees use the SCSEP State Equitable Distribution Report, ETA-8705A and the SCSEP Grantee Equitable Distribution Report, ETA-8705B (SPARQ Forms) annually to provide their analysis of any variances and a narrative of the actions they will take to come into compliance with the equitable distribution requirements. ETA reviews the information grantees provide to determine whether they need technical assistance in meeting equitable distribution requirements.

State Plan

The Governor, or the highest government official, in each state submits the State Plan as an independent document or as a part of the WIOA Combined State Plan. For the purposes of SCSEP, the State Plan outlines a four-year strategy for the statewide provision of community service employment and other authorized activities for eligible individuals under the SCSEP. The Department requests the states to describe economic projections and impact, service delivery and coordination with other programs, locations and populations served (taking into account the current relative distribution, described more fully above, of eligible individuals), and employment opportunities within the state.

Any changes to the strategy must be described in the two-year modification to the State Plan. Among the agencies involved in preparing the SCSEP portion of the State Plan with the state grantees are WIOA agencies, Area Agencies on Aging, community service agencies, and the SCSEP national grantees operating in that state. Grantees use this information to strategically plan for SCSEP service delivery throughout the state and to integrate SCSEP services with WIOA and other federal, state, and local programs. ETA uses the information to ensure that grantees are making progress towards their plans and to offer technical assistance towards reaching the plan's goals when necessary. ETA previously solicited this information through the Four-Year SCSEP State Plan Requirements TEGL and the Two-Year (Modification) SCSEP State Plan Requirements TEGL. The SCSEP stand-alone State Plan is now covered by this control number, and the WIOA Combined State Plan is covered by OMB Control Number 1205-0522. (See SCSEP State Plan and Two-Year Modification Guidance.)

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.*

ETA uses an automated system to collect both programmatic and performance information. Grantees are required to submit data electronically in order to reduce costs and burden and

to ensure the accuracy and uniformity of the data. To accommodate the collection of information on the SCSEP performance measures and service delivery, grantees have used a web-based system, SPARQ, since PY 2005. The system is continually refined and revised to comply with new legal and programmatic requirements and to provide case management functionality requested by the grantees. GPMS, which is also web-based, is expected to be operational by the end of PY 2021, at which point it will replace SPARQ. Furthermore, as described above, the SCSEP Equitable Distribution Report includes a system-generated component, and the quarterly and final QPRs are system-generated.

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.*

ETA's data collection efforts leverage information to prevent duplication of efforts. For example, the equitable distribution information used in the Equitable Distribution Reports come directly from the case management system and is used to develop State Plan updates. The information is system-generated and is leveraged in other reports. See additional information below.

SCSEP grantees are in two separate cohorts: "State" grants, which are awarded by formula and submit State Plans every four years (with updates at the 2-year midpoint); and "National" grants, which are awarded competitively and compete for their funds every four years through an Funding Opportunity Announcement (FOA).

Both cohorts of grantees are required to provide information describing their grant operations and service delivery activities, particularly in the State Plan for State grantees, and in the FOA response for National grantees. In addition, in between State Plan years and National competition years, grantees are essentially required to submit new applications for funding, since their dollars are appropriated annually, and their grants are renewable annually. However, in that annual funds renewal process, it is usually unnecessary for a grantee to resubmit such information, except in extenuating circumstances when they are making a change to their grant operations or activities. Our purpose in this ICR is to streamline these requirements and reduce the burden on both grantees. We will request the information once – in the State Plan and in response to the FOA during competition, clarifying that grantees need not rewrite/resubmit such information in the off-cycle years when they are simply renewing their funding, unless they need to modify such information in their grant plan.

State Plan and Equitable Distribution Report

The OAA-2016 permits grantees to submit a WIOA Combined State Plan, which reduces duplication because SCSEP is part of a consolidated information collection known as the "Required Elements for Submission of the Unified or Combined State Plan and Plan Modifications under the Workforce Innovation and Opportunity Act." This consolidated information collection (OMB Control Number 1205-0522) replaces program-specific State

Plan collections for each of the core programs. Providing a WIOA Combined State Plan response will count as a response for any existing program-specific State Plan information collection requirements for any optional program or program activities that a state includes in its WIOA Combined State Plan. As described above, the Equitable Distribution information collected in the case management system is used by grantees in both the State Plan and the Equitable Distribution Report. The State Equitable Distribution Report form, ETA-8705A, and the Grantee Equitable Distribution Report form, ETA-8705B, require individual responses by grantees and cannot be acquired through other sources.

Grant Planning and Allotment Requirements

The regulations at 20 CFR 641 hold the Department accountable for the information collection required for the annual grant and allotment awards. The planning instructions and allotments guidance information collection reflect these requirements, and there is no substitute for this information.

Performance Accountability and Services to Participants

ETA is in the process of modernizing ETA-wide performance and case management systems as part of its effort to minimize duplicative systems used across ETA programs for performance accountability activities. SCSEP's current stand-alone performance system will be phased out as the new ETA-wide systems (GPMS and WIPS) are deployed. The information collected includes participant personal characteristics, community service and employment activities, dates of program activities, and post-program follow-up information. The current legacy system, SPARQ, and the new GPMS collect information at the participant level that is not available through any other means. SCSEP grantees use the participant-level data to generate aggregate data via the QPR, which is used by ETA to ensure performance accountability. The GPMS is expected to go live on July 1, 2022.

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

Although small entities (only non-profits and government agencies) are active partners in the provision of community services and act as host agencies for program participants, these entities are not actively engaged in the reporting process, which is handled primarily by the grantee. The only exception is that some small employers and host agencies are chosen to receive customer satisfaction surveys. Response to these surveys is, however, voluntary.

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.*

The OAA-2016 and OAA 2020 require the Department to publicly report annual performance of the grantees and implement corrective action if grantees' performance falls below specified negotiated levels in any program year. Reports and plans referenced under this information collection request allow the Department to monitor each grantee's progress toward its performance goals and provide timely assistance to the grantees if needed.

Without accurate performance data, the Department could not measure the success of its grantees and could not ensure that high-quality programs serve program participants.

If the collection of information under Table 1 (State Plan, Grant Planning and Allotment Requirements, Performance Accountability, Services to Participants, and Equitable Distribution Report) is conducted less frequently, it would be contrary to the program requirements mandated by the OAA-2016. In addition, the lack or reduction of these information collections would negatively impact the responsibility and trust that have been placed on the Department by Congress and the public.

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.*

This request 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 April 16, 2021 ([86 FR 20203]). The only comment submitted was irrelevant to the proposed changes in the ICR. In addition, there was extensive consultation in connection with the Interim Final Rule (82 FR 56869 (12/01/2017)) that implemented the changes to the performance measures mandated by the 2016 amendments to the OAA. For the 2020 Reauthorization of the OAA we have received comments through discussions at the monthly all-grantee calls and also in the peer-to-peer training sessions. Comments provided during the all-grantee calls and peer-to-peer trainings were general requests for clarification, therefore did not require changes made to the ICR.

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 any payments or gifts to respondents.

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

For the State Plan and planning instructions and allotments requirements, ETA is not requesting individual-level data. For services to participants and performance accountability (including the customer satisfaction surveys), individual responses are kept private through the use of ETA's standardized security protocols. Other data provided by customers are kept private to the extent provided under existing statutory authorities, except when privacy is waived. ETA follows Department-wide data security measures for all data systems.

In TEGL 39-11 (which provides guidance related to Federal laws and policies regarding data privacy, security, and protecting personal identifiable, and sensitive information), ETA states that grantees must not extract information from data supplied by ETA for any purpose not stated in the grant agreement. ETA recommends that grantees collect Personally Identifiable Information (PII) for grant purposes only, and that before grantees collect PII, or other sensitive information, they ask program participants to sign a release form. ETA advised grantees that their participant release forms should include an explanation of how and for what purposes the data collected will be used.

ETA is mindful of the protection of participant social security numbers (SSNs). Grantees must collect SSNs in order to properly pay participants for their community service work in host agencies. The SSN will also be required for matching participant Unemployment Insurance wage records in order to verify employment outcomes for the required performance measures, which will be done on a quarterly basis. When the participant record is first created, SCSEP's case management systems – both SPARQ and GPMS -- encrypt the SSN and create a unique participant identification number as a primary identifier of the record. The one-time transmittal of SSNs to the server is protected by secure encryption. The SSN is not displayed or transmitted thereafter. Any information that is shared or made public is aggregated by grantee and does not reveal personally identifiable information of individuals.

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.*

Questions of a sensitive nature include self-identification of a disability and whether or not participants were formerly incarcerated. Applicants are informed that Equal Employment Opportunity information, covering gender, ethnicity, race, and disability, is voluntary and that the refusal to provide it will have no effect on any decision to provide services to them.

The collection of this information is similar to other programs (such as WIOA) and complies with the requirements of the Americans with Disabilities Act. Moreover, disability status impacts eligibility under the OAA, and one of the mandated performance measures requires grantees to attempt to collect information about participants’ barriers to employment. When disability is used as an optional factor in eligibility (to provide a more favorable income calculation to an applicant with a disability), it must be documented; however, applicants are not required to claim a disability when applying for the program.

12. *Provide estimates of the hour burden of the collection of information.*

As program appropriations decrease and state and local minimum wages increase, grantees serve fewer participants, which, in turn decreases burden hours. In addition, the changes to the employment outcome measures mandated by OAA-2016 reduced the amount of information that must be collected for the core performance measures and eliminated the additional performance measures. As a result of the 2020 national grantee competition, two new national grantees were awarded a grant and one historically-awarded national grantee was not awarded a new grant. SCSEP currently operates with 77 grantees, one more than in the previous ICR.

Table 2: Senior Community Service Employment Program Burden Hour Estimates

Activity	No. of Respondents (Note 1)	No. of Responses per Respondent	Frequency	Total Estimated Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetary Value of Respondent Time
Submission of the current Forms ETA-9120, 9121, 9122, and 9123 and future ETA 9191 and ETA-5140 SCSEP (Note 2)	50,853	1	Ongoing	50,853	3	152,559	\$24.15/ \$33.77	\$957,909.75/\$377,818.76
State Equitable Distribution Report Form – ETA-8705A	51	1	Annually	51	3	153	\$33.77	\$5,166.81

Senior Community Service Employment Program (SCSEP)

OMB Control No. 1205-0040

OMB Expiration Date: 11/30/21

Activity	No. of Respondents (Note 1)	No. of Responses per Respondent	Frequency	Total Estimated Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetary Value of Respondent Time
Grantee Equitable Distribution Report Form – ETA-8705B	72	1	Annually	72	3	216	\$24.15/ \$33.77	\$1,521.45/5,166.81
Participant Customer Satisfaction – ETA-9124A (Note 3)	10,450	1	Annually	10,450	0.16	1,672	\$9.06	\$15,148.32
Host Agency Customer Satisfaction – ETA-9124B (Note 3)	7,700	1	Annually	7,700	0.16	1,232	\$24.15	\$29,752.80
Employer Customer Satisfaction – ETA-9124C (Note 3)	1,100	1	Annually	1,100	0.16	176	\$24.15	\$4,250.40
ETA Form 9181	77	1	Ongoing	77	.30	23	\$24.15/ \$33.77	\$144.90/\$202.62
Four-Year State Plan (Note 4)	14	1	Annually	14	30	420	\$33.77	\$14,183.40

Senior Community Service Employment Program (SCSEP)

OMB Control No. 1205-0040

OMB Expiration Date: 11/30/21

Activity	No. of Respondents (Note 1)	No. of Responses per Respondent	Frequency	Total Estimated Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetary Value of Respondent Time
State Plan Two-Year Modifications (Note 4)	14	1	Annually	14	17	238	\$33.77	\$8,037.26
Planning Instructions and Allotments for SCSEP (Note 5)	77	1	Annually	77	16	1,232	\$24.15/ \$33.77	\$8,114.40/\$30,257.92
Unduplicated Totals	70,408	1	Varies	70,408	Varies	157,921	Varies	\$1,457,328.08

* 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>). For the participant survey, the hourly rate is the average of all minimum hourly wage rates in effect for the states and localities served by SCSEP.

Note 1, Respondents: The estimated number of respondents varies based on the collection instrument. For the GPMS Data Collection Instrument and QPR submissions, the number of respondents reflects the estimated number of participant records required annually and is calculated based on the PY 2020 modified position count (31,783), multiplied by the average number of participants per funded position of 1.6. The equitable distribution reports are based on a total of 72 state and national grantee (the 4 territories and Washington, DC are not required to submit) for the individual grantee equitable distribution reports and, separately, the 50 states and Puerto Rico for the state equitable distribution reports. For the customer satisfaction measures, a combined 19,250 customer satisfaction survey respondents are anticipated, involving 73 grantees (assumes a response rate of 55 percent of 35,000 customers surveyed). The State Plan submissions affect all 56 state and territory grantees, and the annual planning and allotments requirements affect all 77 grantees.

Note 2, QPR: As part of the Department's effort to streamline program performance reporting and comply with the requirement of implementing the SCSEP performance measures no later than December 31, 2017, ETA previously moved the primary information collection requirements relating to performance from OMB Control Number 1205-0040 to OMB Control Number 1205-0521. This ICR seeks to incorporate the data elements covered under 1205-0521 that are now used in the GPMS into 1205-0040 to support the transition to the new GPMS system by the end of PY 2021. In the interim, ETA requests to combine the four existing data collection forms (ETA-9120, 9121, 9122, and 9123) into one new form, which will incorporate some data elements previously approved under control number 1205-0521 and some new data elements, as part of this information request, which is the new GPMS Data Collection Instrument. After review and approval of this ICR, ETA will request to update the data elements covered under 1205-0521 accordingly.

Note 3, Customer Satisfaction Surveys: The use of the ACSI remains unchanged for the new performance measure, *indicators of effectiveness in serving employers, host agencies, and project participants*. ETA has revised the participant and host agency collection tools by making minor changes in the wording of several questions and the instructions; it also eliminated one host agency question as partially redundant and unnecessary. ETA is also planning to test a redesign of the employer survey in order to reach a broader pool of employers and provide sufficient data for reporting this core measure for all grantees. Additionally, ETA is reviewing its approach for this measure as a part of SCSEP's alignment with WIOA indicators of performance and may investigate a possible replacement for the ACSI.

Note 4, Four-Year State Plan (and Two-Year State Plan Modifications): The Department requests the states to describe economic projections and impact, service delivery and coordination with other programs, locations and populations served (taking into account the current relative distribution of eligible individuals), and employment opportunities within the state. Additionally, the Department requests that the states describe their SCSEP operations relating to performance management, training, community service assignments, placements into unsubsidized employment, and collaboration with the workforce system to maximize opportunities for SCSEP participants to obtain training and supportive services.

Note 5, Planning Instructions and Allotments for SCSEP: SCSEP funds are allocated by a formula set forth in Section 506 of the OAA, and operate on a Program Year basis, from July 1 through the following June 30. The Department updates the collection tool annually to provide funding and authorized position amounts and to assist SCSEP grantees in preparing their budgets and document submissions for the annual appropriation. The Planning Instructions and Allotments TEGM for SCSEP includes information such as the program narrative (e.g., service to minorities and organization structure, monitoring, and audits), optional program special requests, programmatic assurances, and the budget narrative, that is required to receive funding. This annual plan applies to all 77 SCSEP grants.

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).*

The data collection application is web-based and does not require any special software. The application is designed to run on any computer with broadband Internet access and a browser, such as Chrome, Mozilla Firefox, or Sahara. All grantees and sub-grantees have the equipment necessary to operate the application. Grantees need not incur any additional costs although there may be some minor costs (covered by grant funds) associated with training grantee staff to use the system. The data collection applications are provided for free to all grantees and sub-grantees. All grantees are required to use these ETA-provided systems.

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.*

There are no costs to the Federal Government.

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

The PY 2020 national grant competition resulted in a net gain of one national grantee, which impacts both the equitable distribution report and the annual planning and allotment requirements burdens. However, because the modified positions for the program are based on the minimum wage within the state or locality where the positions reside, increasing minimum wages have resulted in fewer modified positions, which means fewer respondent records on which to collect data.

ETA is also reducing the paperwork burden for this ICR by moving the request relating to describing SCSEP grant operations solely to the State Plan (for state and territory grantees) and to responses to the Funding Opportunity Announcement (FOA) submitted by national grantee applicants. The annual planning requirement would be used only to update the information provided in State Plan submissions and FOA responses, as applicable.

Further, the Older American Act Reauthorization of 2020 added a new category to SCSEP priority requirements such that *eligible individuals who have been incarcerated within the last five years or are under supervision following release from prison or jail within the last five years* are now a priority population for enrollment and an additional category for the most in need characteristics that constitute one of the core performance measures. The Act also allows grantees to add this category to the list of barriers the

grantees choose to make eligible for increased periods of participation. This PRA submission adjusts our data collection vehicles to include this added priority.

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.*

ETA publishes the annual performance report (ETA-5140/ETA-9173-SCSEP) and the Goal Negotiation Results of all grantees, as required by statute. SCSEP also makes its data available on <https://www.dol.gov/agencies/eta/seniors/performance> in response to a SCSEP-specific requirement in the OAA and in response to OMB's Open Government Directive, which supports the goals of publishing government information on-line, improving the quality of government information, creating and institutionalizing a culture of open government, and creating an enabling policy framework for open government.

The State Plan is publicly presented for comment by individual states in accordance with each state's comment process. Such processes may include publication in local newspapers or on the state's website. The quarterly and annual performance reports use no complex calculations. Results are generally tabulated as sums, averages, or percentage rates.

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.*

ETA displays the OMB control number and the expiration date.

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.