<u>Justification: "DOL-only Performance Accountability, Information, and Reporting System" (OMB Control Number: 1205-0521) Non-Material Change Request</u>

The data collected in this approved information collection fulfill requirements in Workforce Innovation and Opportunity Act (WIOA) Sec. 116(d)(1), which mandates that the Secretaries of Labor and Education develop a template for the annual performance reports to be used by States, local boards, and of training services for reporting on outcomes achieved by the WIOA programs. Pursuant to WIOA sec. 116(d)(2), required annual data for the core programs to include, among others, those related to primary performance indicators, participant counts and costs, and barriers to employment. The Department of Labor (the Department), Employment and Training Administration (ETA) proposes a non-material change to the approved "DOL-only Performance Accountability, Information, and Reporting System" information collection, OMB control number 1205-0521. This changes will accomplish the following:

- 1. These changes will align the requirements for Senior Community Service Employment Program (SCSEP) grantees to recent changes to the information collected under OMB Control No. 1205-0040.
 - These conforming changes add 2 elements to the PIRL that were approved and have their burden accounted for under 1205-0040, which will collect information on SCSEP participants' formerly incarcerated status. These added elements are also incorporated into calculations on the SCSEP QPR.
 - These changes will also clarify existing calculations in the H-1B and Re-Entry Employment Opportunities (REO) Youth Quarterly Performance Reports (QPR) to increase their accuracy and simplicity. These changes do not increase burden or require any changes to what grantees report, as they only impact the way the submitted data gets aggregated by the Department.
 - These changes will also clarify that certain elements reported by the Trade Adjustment Assistance (TAA) program may also include "extended" Trade Readjustment Allowances (TRA) payments. Pending legislation for TAA would replace "Remedial" and "Prerequisite" TRA with "Extended" TRA, and this proposed change would ensure uninterrupted reporting on these elements whether the legislative proposal passes or not. These do not change the burden associated with the element, as they only allow for greater flexibility in how grantees may report on them.
- 2. Making technical edits within 1205-0521 to align the collected items in ETA-9172 to the aggregation specifications in the REO versions of the ETA-9173.
 - Slightly update program reporting requirements for Re-Entry Employment Opportunities (REO) programs to align the ETA-9172 with their respective QPRs in the ETA-9173 and ensure complete collection and reporting.

- This involves "checking" and "unchecking" data element collection requirements for these programs to ensure that the data elements necessary for consistent aggregations across programs are collected.
- The submitted DOL-Only Participant Individual Record Layout (ETA-9172) includes updates detailed in red font and a revision history sheet.
 - These checks were inadvertently missed and needed to be made required for programs. Grantees were already submitting the data to ensure complete QPRs, and this checking is the formal method to indicate the data elements are required.