

SUPPORTING STATEMENT FOR JOBS FOR VETERANS STATE GRANTS REPORTS

OMB CONTROL NO. 1293-0009

This Information Collection Request (ICR) seeks to revise the forms used by Jobs for Veterans State Grants recipients to request annual funding and interim budget and staffing modifications, and to report on the use of grant funds.

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 Department of Labor's (Department) Veterans' Employment and Training Service (VETS) administers funds for the multi-year Jobs for Veterans State Grant (JVSG) to each state, the District of Columbia, Puerto Rico, and the Virgin Islands on an annual fiscal year basis. These non-competitive, formula-driven grants are codified under 38 U.S.C. § 4102A(b)(5):

“Subject to subsection (c) make available for use in each State by grant or contract such funds as may be necessary to support—(A) disabled veterans’ outreach program specialists appointed under section 4103A(a)(1) of this title, (B) local veterans’ employment representatives assigned under section 4104(b) of this title, and (C) the reasonable expenses of such specialists and representatives described in subparagraphs (A) and (B), respectively, for training, travel, supplies, and other business expenses...”

VETS provides funds to states in accordance with an allocation formula required by 38 U.S.C. § 4102A (c)(2)(B) and as published in regulation at Title 20, Part 1001, Subpart F of the Code of Federal Regulations (C.F.R.). The Assistant Secretary for Veterans' Employment and Training (ASVET) monitors and supervises the distribution and use of those funds as required by §4102A (b)(6). Additionally, and in accordance with 38 U.S.C. § 4107(b), the Secretary reviews performance and provides an annual report to Congress that includes:

- A characterization of the quality and character of priority of services provided to veterans (38 U.S.C. § 4215; 20 C.F.R. §§ 1010.320, 1010.330);
- Efforts to coordinate with the Veterans Administration (in accordance with 38 U.S.C. §§ 4102A(b)(3), 4109); and
- Incentive fund usage (as described in 38 U.S.C. § 4112).

VETS is requesting continued approval for the information collection that streamlines the annual funding request process for grantees, reports the use of grantee funds in sufficient detail to allow interim adjustments that ensure all appropriated funding is expended properly, allows VETS to conduct appropriate oversight and monitoring of grant activities, and provides data needed for VETS' Annual Report to Congress.

The forms and reports collect required programmatic and financial data from States requesting and obligating grant funds. The continued use of standardized formats for collecting this information helps to ensure that requested data is provided in a uniform way, reporting burdens are minimized, the impact of collection requirements on respondents are properly assessed, collection instruments are clearly understood by respondents, and the information is easily consolidated for posting in accordance with statutory requirements.

The legislative and/or regulatory justification for each information collection is as follows:

- A. **Manager's Report on Services to Veterans:** 38 U.S.C. § 4104(e) requires a report on employment and training services provided to veterans and eligible persons by each local employment service delivery point or area. This narrative report is provided to the State Director for Veterans' Employment and Training (DVET) each federal fiscal quarter. It addresses:
 - i. Outreach efforts to employers and other organizations to promote the hiring of veterans and other eligible persons;
 - ii. Veterans and other eligible persons enrolled in case management (receiving intensive services) from staff assigned to the local office;
 - iii. Outreach efforts to locate and serve veterans and other eligible persons with barriers to employment; and
 - iv. Compliance with Priority of Service requirements established at 38 U.S.C. § 4215 and 20 C.F.R., Part 1010.

- B. **VETS-401 JVSG Budget Information Summary:** In accordance with 2 C.F.R., applicants for non-construction program grants must submit certain detailed budget forecast information, as specified by the awarding agency. The awarding agency uses the information provided for the award and general management of the grant. VETS currently uses the OMB-approved (1293-0009) single-page VETS 401, which provides VETS all the budget information needed to accommodate the JVSG program and its five component activities. Continued approval will allow entry of the forecasted costs for activities funded by the JVSG by cost category and cash needs for each funding source by quarter.

C. **VETS-402 JVSG Expenditure Detail Report (EDR):** Financial reports ensure that the grantee adheres to the budget approved by the awarding agency. VETS collects and compiles the EDR information to effectively monitor the use of JVSG funds for each separate program purpose in accordance with the regulations at 29 C.F.R. § 97.41(a)(3). JVSG recipients use the EDR to detail total expenditures by funding source to supplement the quarterly SF-425 Federal Financial Report (FFR), which is used to report total grant spending and draw down of funds. The EDR effectively crosswalks to both the FFR and the JVSG Budget Information Summary (VETS-401) to ensure grantees obligate awarded funding in accordance with their approved budget plan.

Because 38 U.S.C. § 4102A(b)(5) stipulates that JVSG funds are made available to support DVOP specialists, LVER staff, and consolidated DVOP/LVER positions, VETS requires recipients report the amounts expended for salaries and benefits (the primary costs for staff) and number of Funded Positions for each activity.

D. **VETS-403 JVSG Technical Performance Narrative (TPN):** 2 C.F.R. § 200.329 requires grant recipients to report a comparison of actual accomplishments to their established objectives, performance trend analysis, and other information at intervals established by the awarding agency. 38 U.S.C. § 4102A(b)(6) requires VETS to monitor and supervise the use of funds provided to each recipient. The TPN guides recipients to report only on those elements that VETS needs for appropriate oversight.

E. **VETS-501 JVSG Staffing Directory:** Grantees can provide information that allows VETS to ensure they have complied with several staffing requirements by submitting a VETS-501. The form was designed to streamline the requirement for certain staffing information and to minimize the reporting burden on grant applicants. The VETS-501 form:

- i. Satisfies an assurance required by the Drug-Free Workplace Act of 1988, and implemented at 34 C.F.R. §§ 85.605 and 85.610, by providing the locations where grant-funded staff will be assigned;
- ii. Includes the name and assignment information for all grant-funded staff to ensure the grantee is in compliance with 38 U.S.C. § 4102A(c)(8)(A), which requires each employee hired by the State to perform the duties of a disabled veterans' outreach program (DVOP) specialist or local veterans' employment representative (LVER) satisfactorily complete training, authorized under 38 U.S.C. § 4109, and provided by the National Veterans' Employment and Training Institute (NVTI) authorized during the 18-month period that begins on the date on which the employee is so assigned; and

- iii. Provides information on positions filled by non-veterans to ensure the proper justification is provided, as mandated by 38 U.S.C. § 4102A(c)(5)(B), which requires grant recipients notify VETS of and provide rationale for each non-veteran employed as a DVOP specialist or LVER for more than six months.

VETS uses the form to monitor the states' use of funds to staff DVOP, LVER, and consolidated positions; track turnover; identify new hires requiring training; and ensure such staff are appropriately distributed across the states to fulfill their purposes as effectively and productively as possible.

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.

The information collections described in 1 above are a continued collection of information required under the JVSG program. State agencies that receive formula funding under the JVSG submit all forms. Except for the narrative Manager's Report on Services to Veterans, all of the information is provided on the forms submitted for approval. The forms and instructions are made available to the state agencies electronically through the VETS website, and requirements are transmitted via Veterans' Program Letters (VPLs), which are VETS' policy guidance. All forms are used to collect and aggregate staffing, services, or financial expenditure information, as described in the paragraphs below.

The VETS-401 and VETS-501 are used by states to request formula funding available through the JVSG. As part of a request for formula funding, they are used by VETS to make informed grant award decisions.

The VETS-401 allows states to enter projected grant-funded expenses for all activities by cost category and for each quarter. VETS uses this information to administer interim adjustments, such as distributing limited Continuing Resolution funds appropriately, and to ensure states are planning to expend appropriated funding properly. VETS also uses this information to report to Congress annually the amounts that states allocate to each activity, the percentage of the grant states plan to spend on salaries and benefits compared to administrative and overhead expenses, and the number of full-time equivalent (FTE) positions the state certifies can be fully supported by the grant. Because the planned budget is closely aligned with the layout on the other JVSG forms, the information is also used to compare the budget with actual expenditures on a quarterly basis.

On the VETS-402, state agencies report detailed expenditures by quarter, activity, and cost category. VETS uses this data to ensure states are obligating grant funds in accordance with their approved budget, track the number of FTE staff paid by the grant, and monitor quarterly

spending by relevant cost-category and activity. VETS also uses the information to make timely and informed decisions regarding the distribution of stopgap funding.

State agencies use the VETS-403 to provide periodic narrative progress updates and analysis regarding their expenditures, staffing, and performance outcomes. VETS uses these reports to monitor performance compared with the state's approved annual plan, identify technical assistance opportunities, and react as an agency to programmatic obstacles that states describe.

Individual service delivery points or service delivery areas within the states use the Manager's Report on Services to Veterans to assure VETS that the approved state plan is being followed at the local level. VETS uses it as a monitoring tool to evaluate services provided and outcomes that result from those activities.

The VETS-501 contains the addresses of all locations at which JVSG-funded staff operate, staff names, activities, whether they are assigned to the grant full- or half-time, the date of assignment, and the date they completed required training. VETS uses the information on this form to ensure staff are trained within 18 months of hire (as required by statute), monitor vacancies, identify locations to conduct onsite monitoring visits, identify any positions filled by non-veterans, and ensure the state is appropriately assigning staff across the state to provide individualized career services to veterans with significant barriers to employment.

All the information collections, past and proposed revisions, have been or will be used to report staff utilization rates, use of funding, and results to Congress annually.

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.

The Manager's Report on Services to Veterans is not a form. All other information collections are forms made available to grantees through the VETS website. Manager's Report on Services to Veterans is completed in narrative form electronically using the grant recipient's preferred format (usually Microsoft Word) and submitted via email.

The VETS-401 is a Microsoft Excel worksheet. Once completed, recipients upload it as an attachment to the grant modification system (GrantSolutions) with any budget-related grant modification. VETS is working toward incorporating this form into the GrantSolutions system, so that the information is submitted electronically. Electronic submission is scheduled to go live in August 2023.

The VETS-402 is a Microsoft Excel workbook. It is updated and submitted via email on a quarterly basis. VETS is working toward incorporating this form into a new system currently in development, the VETS Grantee Reporting System (VGRS). Electronic submission is projected to go live in 2024.

The VETS-403 is a fillable PDF document. Once completed, it is submitted via email. VETS is working toward incorporating this form into VGRS. Electronic submission is projected to go live in 2024.

The VETS-501 is a Microsoft Excel worksheet. Once completed, recipients upload it as an attachment to GrantSolutions with any staffing-related grant modification. VETS is considering incorporating this form into VGRS.

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.

The continued information collection modifies current formats to eliminate both duplication and the collection of redundant information. The forms standardize and streamline the methods of collection and ensure that only necessary information is captured and reported in a uniform manner, so that similar data can be easily collected, aggregated, and compared from quarter to quarter and from state to state. A search of the published application forms and federal reports indicates that these forms and reports do not duplicate any similar information already available.

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

This information collection does not impact small businesses or other small entities.

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 VETS-401 JVSG Budget Information Summary and VETS-501 JVSG Staffing Directory are completed annually and as-needed if the recipient requests a grant modification that pertains to their budget and/or staffing, respectively.

The Manager's Report on Services to Veterans, VETS-402 JVSG EDR, and VETS-403 JVSG TPN are required on a quarterly basis.

Without these collections, VETS cannot report on the activities and outcomes associated with the funding provided by Congress to provide services to veterans as codified under 38 U.S.C. § 4102A(b)(5) and 38 U.S.C. § 4102A(c)(2)(B). Further, without these collections the Secretary of

Labor would not have the information needed to report to Congress in accordance with 38 U.S.C. §4107(b).

Without these forms, VETS would also be unable to meet its fiduciary and programmatic oversight obligations. The annual collections establish the recipient's approved plan, and the quarterly collections provide periodic progress updates as required by 2 C.F.R. § 200.

The forms also provide a framework to assist grant recipients as they submit required planning and progress information. They prevent recipients from supplying extraneous information and expending more time and resources on reporting than VETS requires.

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 secret, 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.**

VETS does not anticipate any special circumstances that would necessitate any of the above-listed requirements.

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.

The Department published a *Federal Register* notice on October 22, 2021 (86 FR 58696), notifying the public of its intent to pursue this information collection (OMB Number 1293-0009). The Department received four responses to the notice on a variety of subjects and replied directly to commenters to ensure that there was clarity and consensus on all items. The comments and our replies are summarized below.

Management and administrative costs activity

Commenters inquired about the purpose, definition, guidance, and reason for this new activity that was explained in the 60-day notice as follows:

“Add activity to budget for and report on management and administrative costs. Currently, grant recipients have no appropriate way to reflect the direct-charged salaries and benefits of staff supported by the grant other than Disabled Veterans' Outreach Program (DVOP), Local Veterans' Employment Representative (LVER), and consolidated DVOP/LVER staff. By adding an “Mgmt & Admin Costs” activity to the VETS-401 Budget Information Summary, VETS-402 Expenditure Detail Report, and VETS-403 Technical Performance Narrative, grantees will be able to easily budget for and report on these expenses.”

We explained that most indirect expenses would be budgeted and reported using this activity, and that the reason for using the title “management and administrative costs” is because it is not limited by the various definition of “administrative costs” that are found between the Workforce Innovation and Opportunity Act, the Uniform Administrative

Guidance, and other locations. The activity is meant to capture those non-programmatic expenses that are not specific to the other activities (DVOP, Consolidated, LVER, or Incentives), which may also include program management of DVOP, Consolidated, and LVER staff.

Duplicate reporting between the SF-425 FFR and the VETS-402 EDR

A commenter requested VETS discontinue requiring recipients report quarterly expenditures on either the SF-425 or the VETS-402 because both capture expenses on a quarterly basis. The SF-425 collects the quarterly outlays and obligations only; once the grant has been fully expended, it collects indirect cost expenditures for the entire life of the grant. The VETS-402 requires a great deal more detail, including the number and type of staff paid out of the grant and a breakout of activity costs. The VETS-402 has a “crosswalk” section that allows financial staff to easily complete the SF-425.

After consulting with our Grant Officer, VETS ascertained that both forms are needed. The SF-425 is critical to proper operation of the financial system, and the VETS-402 provides a level of detail that is necessary for grant oversight.

Quarterly breakout of planned expenses on the VETS-401

A commenter inquired why VETS requires a quarterly breakout of planned expenses in Section C of the VETS-401, when most respondents will simply divide the total costs by four in order to respond to that section.

VETS explained that completing Section C of the VETS-401 in that manner is a misuse of the form that interferes with grant oversight. The awarding agency needs accurate estimates of recipients’ funding needs, so that we can ensure each recipient receives adequate and timely funding during Continuing Resolutions, when limited funding is available. The quarterly breakout is a key component to making these funding decisions when completed properly. VETS also consulted with our Grant Officer on this question, who ascertained that the collection of quarterly planned expenses is a reasonable and necessary practice.

The VETS-403 contains a loss of functionality compared to the previous version

A commenter noted that the VETS-403 TPN, which is in fillable PDF format, no longer automatically expands narrative fields, selects additional rows to input staff turnover, and other convenient features.

VETS explained that the Department no longer provides access to necessary software to support those features. We constructed the form to the best of our ability to make it useable and convenient using the software that is licensed to the Department. We also explained that we are working on building a new reporting system (VGRS) that will support much better functionality in the future.

The Salaries & Benefits Percentage (S&B%) will not auto-calculate on the VETS-403

A commenter inquired whether the S&B% could be auto-calculated on this form.

VETS explained that some of the data needed to calculate this comes from previous years' financial reports. If VETS required that data be inputted on this form, the S&B% could be auto-calculated, but that would require duplicative reporting. After weighing the benefit of an auto-calculated field against the harm of duplicate reporting, VETS has opted to avoid the duplication. However, each respondent has a dedicated Grant Officer's Technical Representative (GOTR) with additional resources to assist with the calculation.

There are formatting errors on the VETS-501

A commenter reviewed the draft VETS-501 and identified inconsistent formatting and data validation rules on the form.

VETS appreciates the feedback and has corrected all identified errors.

Estimated burden hours

One commenter disputed VETS' estimate of the number of burden hours; however, this was due to the commenter misreading the burden hours chart.

VETS clarified the table and demonstrated the arithmetic behind each table. The commenter agreed with the estimates and withdrew the dispute.

In addition to the required information collection activities, VETS shared draft versions of the forms with grant recipients, who are the primary respondents of these forms, through multiple channels. We gave presentations on our goals for the forms and major changes in two different venues and encouraged agency staff to engage with respondents as well. Respondents were encouraged to reply through the Federal Register notice.

Outside of the formal comment period, VETS staff received draft forms and instructions for testing purposes. Between June 2021 and March 2022, staff continued testing and commenting to ensure the forms are as intuitive and functional as possible. Feedback included:

- **VETS-401:** S&B% calculation should exclude incentive awards; FTE count should not be rounded; date and grant number fields need instruction to avoid error message; rename the new administrative cost column for clarity (name was later changed to "Mgmt & Admin Costs," as a result and per Grant Officer consultation).
- **VETS-402:** Date and grant number fields need instruction to avoid error message; need to continue supporting the Output tab because grant recipients find it helpful.
- **VETS-403:** Performance goal and outcome fields need to be expressed to the nearest tenth of a percentage point; editable fields should be pale yellow consistent with the other

JVSG forms; recommendation to continue including individualized career services to veterans rate fields due to its importance in the statute; change the names or subtitles of item (h) and (i) to align with VETS guidance on this topic.

- **VETS-501:** Date and grant number fields need instruction to avoid error message; ensure all data entry fields are unlocked; more column width is needed for staff names; decrease column width for position type.

VETS consulted with the agency's Grant Officer on whether the forms asked for necessary information that is standard practice for grants management and oversight. The Grant Officer made several recommendations, particularly on the VETS-401, that helped to improve the forms. As needed, we also requested guidance to address concerns raised by commenters. Specifically, these consultations resulted in the addition and eventual renaming of the new "Mgmt & Admin Costs" activity, the removal of displaying percentages of individual cost categories on the VETS-401, rejecting a proposal to display any indirect cost percentages, and affirming the necessity of the continued use of the SF-425 FFR.

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

VETS did not provide 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.

VETS did not provide any assurance of confidentiality was provided to respondents.

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.

No questions of this nature are included in any component described in this information collection request.

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. General, 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 13.

To determine the average burden for this collection of information, nine GOTRs asked their grant recipients how long the activity usually took. VETS estimated the number of separate responses per year typically submitted using recent actual submissions.

The responses for Manager's Reports ranged from 1 to 28 reports per quarter and from 45 minutes to 5 hours per report. VETS multiplied the total response by four to determine that each of our 54 states submitted an average of 51 Manager's Reports per year (although only one response per state per quarter is required), at an average of 1.75 hours per report. There is a large variance between response numbers and hours because some respondents use the Manager's Reports for additional purposes such as reporting to their state leadership on grant-funded activities. This use of the information collection is not required, encouraged, or even suggested by VETS.

For all other information collections, the respondents' estimated burden hours were substantially similar and varied only slightly from the previous submission.

Affected Public: JVSG Applicants/Recipients (54), an agency within each recipient state or territory.

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate¹	Total Burden Cost
VETS-401 Budget	54	1	54	1.5	81	\$54.96	\$4,452
VETS-402 EDR	54	6 ²	324	2	648	\$54.96	\$35,614
VETS-403 TPN	54	4	216	2	432	\$54.96	\$23,743
VETS-501 Staffing	54	1	54	1.5	81	\$54.96	\$4,452
Manager's Report ³	54	51	2,754	1.75	4,820	\$54.96	\$264,852
Unduplicated Total	54	118	3,402	9	6,062	\$54.96	\$333,167

¹ Hourly rate is based on the Department's Bureau of Labor Statistics' quarterly economic analysis series titled "Employer Costs for Employee Compensation." The \$54.96 figure was derived from Table 3 titled, "Employer costs per hour worked for employee compensation and costs as a percent of total compensation: State and local government workers, by major occupational and industry group," dated December 2021.

² The VETS-402 EDR is a workbook updated on a quarterly basis until all funds are expended or the period of performance has ended. On average, grantees need six quarters to expend each year's funding.

³ Manager's Reports are submitted by many respondents and require a time commitment that is determined largely by grantees' discretion. Values on this row reflect actual estimates rather than VETS requirements.

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.**

Respondents will not need to purchase any equipment or special software to respond to this information collection request. As these data collection requirements apply to state formula grant recipients, administrative resources are provided as part of the grant to offset staff costs associated with reporting and systems modifications. There is no additional cost to respondents.

- 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.**

Collection of this information does not represent a cost to the federal government. In fact, the collection of information in this format represents a savings to the federal government. Without collecting the information in a standard format, VETS would need additional resources to meet our fiduciary obligations and requirements to report grant activities to Congress on an annual basis.

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

Program changes

With this information collection, VETS implements the following changes to the reports in support of programmatic updates.

Add activity to budget for and report on management and administrative costs. Grant recipients had no appropriate way to reflect the direct-charged salaries and benefits of staff supported by the grant other than Disabled Veterans' Outreach Program (DVOP), Local Veterans' Employment Representative (LVER), and consolidated DVOP/LVER staff in the previous version of the forms. By adding an "Mgmt & Admin Costs" activity to the VETS-401 Budget Information Summary, VETS-402 EDR, and VETS-403 TPN, grantees will now be able to easily budget for and report on these expenses.

Remove several reporting requirements. On the VETS-501 Staffing Directory, VETS is removing the requirement to enter each staff position's office name and number, email address, intensive service coordinator designation, and program manager designation. VETS no longer needs that information. On the VETS-403 TPN, VETS is removing the requirement to submit a fifth quarter spending plan, as there are no special rules for spending JVSG funding in the fifth quarter (or in later quarters), as opposed to the first four quarters. All expenditures must be made in accordance with the terms and conditions of the grant, regardless of the quarter in which the expenditure occurred. VETS is also removing the collection of Wagner-Peyser Services to veterans performance goals and outcomes on this form because we no longer require states to set those goals or track the outcomes.

Remove the subform allowing for reporting on the cash basis of accounting. Historically, VETS allowed recipients to report financial expenditures using either the cash basis of accounting (on the VETS-402A) or the accrual basis of accounting (on the VETS-402B). To align with 2 C.F.R. § 2900.14, as well as accommodate certain programmatic changes, VETS determined that JVSG

recipients must report using the accrual basis of accounting. The VETS-402A subform that accommodates the cash basis will be discontinued. The VETS-402B subform will simply be referred to as the VETS-402 form because there will be no subforms.

Reorganize the VETS-401 Budget Information Summary for clarity. VETS moved certain parts of Section B into a new section of the form, Section D. The moved components include the number of FTEs to be supported by each activity's allocation and the automatically-calculated salary and benefits to total expense ratio and cost per position. The reorganization also includes transposing Section C's rows and columns, making it easier for users to compare entries with Section B. Adjusted certain row header names for clarity (e.g., changing "PS+PB/Total ratio" to "Salaries + Benefits/Total Percentage") and for alignment with the SF-425 cost categories (e.g., changing "Personnel Benefits" to "Fringe Benefits"). Where appropriate, the renaming described on the VETS-401 is also reflected on the VETS-402 and VETS-403.

Formatting and structural changes for Section 508 accessibility compliance. VETS is committed to ensuring the forms can be read by accessibility software to the greatest possible extent. Some changes to the format and appearance of the forms have been made for this purpose.

Adjustments to burden hours

The total burden hours for this ICR decreased from 17,053 to 6,062 since the last approval. This reduction is primarily due to the reduction of requirements for Manager's Reports. VETS reviewed our statutory requirements and found that we no longer needed certain components of these reports. We also identified that we could allow states to submit one Manager's Report that covered several offices instead of one report per office. This drastically reduced both the number of hours per report and the number of reports.

The average response hours for the VETS-401 and VETS-501 also decreased slightly because of responses from grant recipients on the actual amount of time it takes them to complete the collections.

At the same time, the number of annual responses for the VETS-402 increased from four per year to six per year. This is because the amount of time states may take to expend their grant award has increased from five quarters to 12 quarters.⁴ VETS anticipates that, on average, states will need a total of six quarters to expend their annual grants.

⁴ The Consolidated Appropriations Act, 2021, signed on December 27, 2020, provided for an additional seven quarters during which recipients of the Jobs for Veterans State Grants (JVSG) may expend each fiscal year's funding. This change from five quarters of funding availability to up to twelve quarters was retroactive to the Fiscal Year (FY) 2020 awards. The Department's ICR Change submission requesting additional quarters be added to the form VETS-402 (at that time both A and B versions) was approved by OMB on June 4, 2021.

- 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.**

The Department does not publish the results of this information collection.

- 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.**

The Department does not seek an exception to the requirement to display the expiration date on this information collection.

- 18. Explain each exception to the certification statement.**

The Department is not requesting an exception to any of the certification requirements for this information collection. This request complies with 5 C.F.R. § 1320.9.

B. Collections of Information Employing Statistical Methods

There are no statistical methods in this collection.