

SUPPORTING STATEMENT
U.S. Department of Commerce
Economic Development Administration
EDA Workforce Data Collection Instrument
OMB Control Number: None (new information collection)

A. JUSTIFICATION

This Supporting Statement is for a new information collection.

1. Explain the circumstances that make the collection of information necessary.

To effectively administer and monitor its economic development assistance programs, EDA collects certain information from applications for, and recipients of, EDA investment assistance. Under the EDA American Rescue Plan (ARP) Act Good Jobs Challenge, award recipients will be required to submit identified program metrics and information to ensure that EDA workforce investments are evidence-based and data-driven, and accountable to participants and the public. EDA will require information on three key award stakeholders: 1) System Lead Entity/Backbone Organization, defined as the lead entity of a regional workforce training system or sectoral partnership; 2) Training Providers, defined as entities providing relevant training and learning in a regional workforce training system; and 3) Participants, defined as individuals directly trained and placed into jobs via a regional workforce training system. System Lead Entities / Backbone Organizations will also coordinate with relevant employers to understand program performance from the employers' perspective. All process, output, and outcome metrics are associated with the following objectives:

- **System Lead Entity / Backbone Organizations:** 1) Establish, strengthen, or expand sectoral partnerships or regional workforce training systems; 2) Target underserved populations and areas to participate in the skills training program to reduce systemic inequities and barriers to employment and enhance diversity, equity, and inclusion in industry, including by securing and offering wrap-around services; 3) Support employers in filling demand for good-paying jobs, and 4) Leverage federal and non-federal funds to expand reach and support sustainability.
- **Training Providers:** Provide skills training to unemployed, underemployed, or incumbent workers with opportunity for increased wages through targeted upskilling to place them into quality jobs and provide employers with skilled workers.
- **Participants:** Position for employment and wage growth.

EDA will require all ARP Act Good Jobs Challenge award recipients and stakeholders to submit this data at predetermined intervals (System Lead Entities / Backbone Organizations, semiannually on their systems and providing data collected from Training Providers and Participants within their systems on a quarterly basis) to determine results and sustainability of the original grant award throughout the period of performance.

2. Indicate how, by whom, and for what purpose the information is to be used.

The information will be used by EDA to monitor and assess the performance of Good Jobs Challenge award recipients, as well as to evaluate the impact of the Good Jobs Challenge program. In doing so, EDA will ensure that the agency's workforce investments are evidence-based and data-driven, and accountable to participants and the public.

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.

EDA plans to collect the information via electronic submissions, likely through Centurion.

4. Describe efforts to identify duplication.

EDA reviews new and existing information collections to ensure that there is no duplication. The information requested is unique to the information collection and is not collected elsewhere.

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

Pursuant to EDA's authorizing legislation and regulations, eligible applicants and eligible recipients of EDA investment assistance include "small entities" as defined by the Regulatory Flexibility Act (5 U.S.C 601(6)). Accordingly, this information collection potentially involves small entities. As part of this process, EDA has conducted a thorough review of its forms and other information collections to minimize respondent burden. EDA collects only the minimum amount of information to effectively administer its programs and to monitor compliance with PWEDA and EDA regulations.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

EDA serves as the lead bureau for the Department of Commerce's Strategic Objective 2.2 ("Build sustainable, employer-driven career pathways to meet employers' need for talent and to connect Americans to quality jobs"). EDA requires the information collected to fulfill the agency's responsibility to monitor and assess the performance of Good Jobs Challenge award recipients, as well as to evaluate the impact of the Good Jobs Challenge program. If the information were not collected or were collected less frequently, EDA's ability to monitor and oversee Good Jobs Challenge award recipients would be impaired, possibly preventing EDA from fulfilling the agency's statutory mandate under PWEDA.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances that would require the information collection to be conducted in a manner inconsistent with OMB guidelines.

- 8. Provide a copy of the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to the notice and describe the actions taken by the agency in response to those comments. Describe the 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.**

On March 29, 2022, EDA published a Federal Register notice (FRN) that solicited public comments on this information collection (87 FR 17982). No public comments were received in response to the FRN that solicited public comments on this information collection.

In particular, EDA solicited views from persons outside the agency including from University-affiliated and independent researchers, workforce development practitioners, Department of Commerce and other Federal agency staff, and OMB staff on topics including but not limited to: (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

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

No gifts or payments are made to any respondent, other than disbursements of award funds to financial assistance recipients.

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

While information submitted by a respondent to EDA generally is subject to public disclosure, EDA does not publicly release confidential business information, including trade secrets and confidential commercial or financial information, to the extent that such information is exempt from public disclosure under the Freedom of Information Act (FOIA). See 5 U.S.C. 552(b)(4). Additionally, EDA does not release information that would constitute a clearly unwarranted invasion of personal privacy. See 5 U.S.C. 552(b)(6).

- 11. Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

This collection of information requests certain demographic information, including race, ethnicity, and gender. This information is necessary to assess whether the Good Jobs Challenge program is advancing equity.

This collection of information also requests certain personal information, including workforce participants’ dates of birth and address. This information is necessary to assess whether the Good Jobs Challenge is effectively serving workforce participants and resulting in good paying jobs.

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

Type of Metric (all information to be provided by System Lead Respondents)	Number of Responses	Hours per Response	Number of Responses per Year	Total Estimated Time
System Information	50*	2 hours	2 (Semiannually)	200 hours
Training Provider and Training Participant Information	50*	16.7 hours (4 training providers serving 50 participants each* X 5 minutes per participant)	4 (Quarterly)	3,333 hours
Total				3,533 hours

**The number of responses should be considered estimates given the Good Jobs Challenge intended impact. Given investment alignment and program priorities are founded on equity, there could be lower number of stakeholders participating given their efforts to work with individuals most underserved.*

Multiplying the expected number of responses by the average time to complete a response, EDA estimates the above total respondent burden.

13. Provide an estimate of the total annual cost burden to the respondents or record keepers resulting from the collection of information (excluding the value of the burden hours in Question 12 above).

Apart from the value of the burden hours, there is no additional cost to respondents associated with this information collection.

14. Provide estimates of annualized cost to the Federal government.

EDA estimates the total annual cost burden to the federal government to be \$57,032 (200 responses, each taking four hours, multiplied by \$71.29 per hour). The hourly wage used is that of a federal employee at grade 13, step 4, plus 30% to account for overhead and other costs (\$54.84 per hour + \$16.45 per hour).

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

This is a new information collection, thus there are no changes or adjustments to a prior information collection.

16. For collections whose collections will be published, outline the plans for tabulation and publication.

Specific details of information collected from respondents will generally not be published.

However, information collected from respondents may be published in aggregate form as part of EDA's annual report, GPRA reporting, EDA's Balanced Scorecard, progress reports to the DOC and/or its OIG, or other summary reports.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that the display would be inappropriate.

EDA is not seeking approval to not display the expiration date of OMB approval for the information collections.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

EDA does not employ statistical methods to collect data for this information collection.