

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. This information collection also improves the customer evaluations effectiveness of SCSEP as reported in customer satisfaction surveys. We are requesting to discontinue two documents and renew other documents under this ICR with no changes.

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 relates to revisions to SCSEP's customer satisfaction survey collection instruments (ETA-9124A– Participant Survey, ETA-9124B– Host Agency Survey, and ETA 9124C – Employer Survey). This ICR also relates 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). The following requests are: 1) renew the combined information collection (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; 2) make updates to the SCSEP's customer satisfaction survey collection instruments (ETA-9124A– Participant Survey and ETA-9124B– Host Agency Survey, adding ETA-9124 C1 and C2—Employer Survey); 3) renew the response requirement in the SCSEP Four-Year State 4) renew the Equitable Distribution Forms and include the Equitable Distribution Report which is now part of the annual guidance to eliminate duplication; and 5) 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 renewing ETA-5140 – SCSEP Quarterly Progress Report, formerly used with SPARQ, but now used in the new GPMS; and renewing ETA 9181 from the ICR though it is not necessary data collection. The elements for the data collection instrument included in the last ICR submission are being updated based upon the progress of the GPMS developer and has not been updated to date.

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 to comply with the OAA statutory and regulatory requirements. The information is also necessary for grantees' performance accountability and program management.

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 no changes that affected the customer satisfaction surveys.

One of the seven core performance measures that the OAA requires the Department to report on is "Indicators of effectiveness in serving employers, host agencies, and participants." As stated in the SCSEP Final Rule, ETA uses customer satisfaction surveys to report the American Customer Satisfaction Index (ACSI) score to meet this statutory requirement [OAA-2016 Section 513(b)(1)(E); 42 U.S.C. sec. 3056k(b)(1)(E); and 20 CFR 641.700 and 710].

This information collection request (ICR) seeks to revise the customer satisfaction survey instruments and methods of administration. The Department is proposing revisions to all three surveys: ETA-9124A– Participant Survey and ETA-9124B– Host Agency Survey, and ETA-9124C – Employer Survey. These changes are designed to reduce the costs of the survey administration and make administration less burdensome for respondents and grantees, as well as to make the surveys more relevant to the current SCSEP environment and standard business practices.

The Department seeks to make the following changes to the survey instruments:

- Adding a question to the participant and host agency surveys about the extent to which SCSEP has been effective in the face of the COVID-19 pandemic. This question will only be asked in years during which SCSEP participants and host agencies have been affected by a pandemic.
- Expanding the sample of employers to receive the customer satisfaction survey to ensure that all grantees have a sufficient number of responses for an ACSI score that is a reliable and valid and can therefore serve as part of one of the grantees' core measures. The new employer survey approach will reach all employers of SCSEP participants that exited and were hired, should ensure the minimum sample size required for reliability, and will provide comprehensive customer feedback from employers. See Part B.

To accomplish this expansion of the employer survey pool, the existing employer survey will be divided into two versions: one for host agencies that hire a participant as their employee after the participant has ended their community service assignment (ETA-9124 Part C1); and a separate one for all non-host agency employers that hire an exited participant (ETA-9124 Part C2). The Department modified the non-host agency version of the survey to be relevant for employers who receive a substantial service (C2A) and those that did not (C2B). Three skip questions will only be answered by the subset of employers that received a substantial service in connection with the placement. These changes are required to provide a larger survey sample and thus more survey responses to ensure a reliable ACSI score for the core measure for all grantees.

The Department also seeks to reduce the cost of survey administration and reduce the burden on respondents and grantees by using digital surveys delivered by email where feasible, instead of the current paper surveys delivered by the postal service, and to use a centralized mail house for a new version of the employer survey (ETA-9124 Part C2B):

- The Department plans to use digital surveys transmitted by email for all host agency surveys (ETA-9124B) and all host agency employer surveys (ETA 9124 Part C1). Digital surveys will yield better quality data, reduce the burden on and be more convenient for respondents, and, by eliminating the substantial cost of paper survey production and postage, achieve significant cost savings.¹
- It is not feasible to use digital surveys for all non-host agency employers (ETA-9124 Part C2) at this time because the Department does not have reliable email addresses for some employers who did not receive a substantial service, nor does it have an established relationship using email such that these employers would be likely to reply. For that reason, the Department will continue to use paper surveys for this employer group until an adequate response rate has been achieved with the emailed digital survey approach. However, where the Department has email

¹ <https://bmcmedresmethodol.biomedcentral.com/articles/10.1186/s12874-017-0337-1>

addresses for the subset of non-host agencies that have received a substantial service (C2A), it will pilot the use of digital surveys.

- While the Department is not proposing to shift to digital for the participant survey immediately, the Department seeks to administer the participant survey on a pilot basis to the subset of participants who have email addresses, internet connectivity, and an appropriate device, and who have demonstrated that they are comfortable using the internet. During the pandemic, grantees have worked intentionally with participants to increase their digital capability to engage in remote training and to participate in remote host agency assignments when in-person assignments are not available or feasible. This subset of participants is ideal for a pilot project to determine the best ways to achieve a robust response rate. The Department will seek approval for broader use of digital surveys for participants when the pilot has demonstrated an acceptable response rate is achievable.
- Along with the change from paper/mailed to digital/emailed survey delivery, the Department is changing the current method of administration for the employer survey. Currently, each of the grantees has been responsible for mailing or hand delivering the survey to qualifying employers throughout the program year, at the time of the first placement in that year. This distributed delivery mechanism was not reliable or consistent. As reported in the PY 2021 PRA submission, the employer survey was suspended pending a revision to the survey and a new method of administration.

The Department is now proposing that the new non-host agency employer paper survey (ETA-9124 Part C2) be administered by a central mail house. This method of administration has proven to be very effective for the ETA-9124A– Participant Survey and has returned response rates far above the industry average over many years. As described above, the Department will experiment with digital surveys for this employer group and will seek approval for broader use of employer digital surveys when it has achieved an acceptable response rate with the pilot design. Although the initial administration of the paper survey will be annual, the Department will also test administering the survey quarterly, a closer connection between the time of employment and the time of receiving a survey which may generate a higher response rate. If the Department determines that annual administration of the mailed employer survey is not sufficient, we will pilot the quarterly option as well. A summary of these changes, along with the program year of implementation, is presented in Table 1.

Table 1 - Data Collection Instruments

	PY 22 under active ICR	PY 23 under revised ICR	PY 24
Participant and Host Agency Surveys			
Participant	Paper—begin no later	Continue Paper	Pilot

Survey	than August 1; Need complete data by January 1, 2024		Digital, Continue Paper
Host Agency Survey	Digital—begin by January 15; Need complete data by March 15, 2024	Continue Digital	Continue Digital
Employer Surveys			
Host Agency Employers (9124 Part C1)	N/A	Digital—begin by March 15; Need complete data by June 15	Continue Digital
Non-Host Agency Employers with Substantial Service (9124 Part C2A)		Paper—implement new approaches to increasing response rate; begin no later than March 15, 2024; need complete data by September 15	Continue Paper, Pilot Digital
Non-Host Agency Employers with No/Little Connection to SCSEP (9124 Part C2B)		Paper—implement new approaches to increasing response rate: begin no later than March 15, 2024; need complete data by September 15	Continue Paper, Pilot Digital

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.*

ETA utilizes the existing Customer Satisfaction Surveys (ETA-9124A, ETA-9124B, and ETA-9124C) to gather required information on the core performance measure, “Indicators of effectiveness in serving employers, host agencies, and participants,” mandated by the OAA-2016. 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), an internationally recognized index of customer evaluation for products and services. 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 manage and improve program performance. ETA uses the ACSI scores to

calculate grantees' performance on this measure, which is reported on the grantees' final QPRs.

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 added the required data element for formerly incarcerated individuals in Section D, Participant Characteristics, subsection Additional Measures (SCSEP Quarterly Progress Report - ETA-5140) in the last revision of this ICR.

This submission also renews, without revisions, the four current data collection instruments for use until such time the GPMS is further developed. The forms includes:

- ETA-9120 – Participant Form -
- ETA-9121 – Community Service Assignment Form
- ETA-9122 – Exit Form - renews without revisions
- ETA-9123 – Unsubsidized Employment Form ETA-5140 – Quarterly Progress Report
- ETA-9191 – Data Collection Instrument
- ETA-8705A - Equitable Distribution
- ETA-8705B - Equitable Distribution
- State Plan
- Annual Planning Guidance TEG

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.*

As set forth in Section 1, the Department currently uses paper for all three Customer Satisfaction surveys. This ICR seeks approval to use emailed digital surveys for the entire host agency survey (ETA-9124B) and for the proposed host-agency employer survey (ETA-9124C1). The Department also seeks to pilot the use of emailed digital surveys with

a subset of the participant pool ((ETA-9124A) and with the non-host agency employer survey (ETA-9124C2A). Given the near-universal use of email and the increasing use of digital surveys in both the public and private sectors, we expect these proposed changes to yield better data and higher response rates and to reduce respondent and grantee burden while substantially reducing cost.

Data Collection Forms

When the GPMS is fully developed, grantees will collect data listed in the four existing 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 functionality for this data collection is fully developed in GPMS. The 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.)

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.*

Customer Satisfaction Surveys

The SCSEP Final Rule requires the use of the three surveys for one of the core performance measures mandated by the OAA. The information produced by the surveys does not exist in any other data collection maintained by the Department. The information required to administer the surveys -- names, addresses, and email addresses -- is contained in the SCSEP case management system, and thus no duplication of effort will be required to obtain or access the information.

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

Only non-profits and government agencies may serve as host agencies. Some of these are small entities, as are some employers. Response to these surveys is, however, voluntary. In addition, the use of email and digital surveys will minimize the burden for those entities that choose to respond by allowing individuals and entities to respond online and submit their responses without needing to fill out and mail back a completed paper survey.

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 requires the Department to publicly report annual performance of the grantees and to implement corrective action if grantees' performance falls below specified negotiated levels in any program year. As set forth above, the customer satisfaction surveys are part of the SCSEP core measures and must be report annually. The Department uses the data derived from the surveys to monitor each grantee's progress toward its performance goals and provides 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 surveys are conducted less frequently, it would be contrary to the program requirements mandated by the OAA. In addition, the lack or reduction of this information collection would negatively impact the responsibility and trust that Congress and the public have placed on the Department to serve this population of older Americans.

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.

As required by 5 CFR 1320.8(d), the Department solicited comments on the SCSEP Customer Satisfaction Survey information collection. The request for comment was

published in the Federal Register on August 4, 2023 (88 FR 51858). The one comment received was irrelevant to the request for comment but was instead a request for more information about where to find SCSEP services. A copy of the information request and the response is attached to this submission.

9. *Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.*

At this time, 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 services to participants and performance accountability (including the customer satisfaction surveys), individual responses are kept private using ETA's standardized security protocols. Neither grantees nor the Department has access to any identifiable survey data. Completion of the surveys is optional, and grantees are not requested to include any personally identifying information. Because the surveys are administered by and returned to vendors and contractors, grantees and the Department do not have any access to the survey responses of identifiable individuals. All reports provided to the Department and the grantees contain only aggregate data or de-identified written comments. For survey administration and analysis purposes, the surveys do contain codes that are used for matching survey responses to data in the SCSEP case management system; however, no one other than the survey contractors has access to these codes.

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.

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.

Participation in the surveys is entirely voluntary, and respondents may skip any question if they choose to participate. The surveys do not ask any questions that are considered sensitive.

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

As in prior years, program appropriations remained flat, state, and local minimum wages increased, and grantees served fewer participants and host agencies, which, in turn decreased burden hours. The changes to the surveys requested in this package will add new employer respondents, but the use of digital surveys will reduce the amount of time required to complete and return the surveys. The net burden is reduced as shown in Table 2

Table 2: Senior Community Service Employment Program Burden Hour Estimates

Activity	No. of Respondents (Note 1)	No. of Responses per Respondents	Frequency	Total Estimated Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetary Value of Respondent Time
Participant Customer Satisfaction – ETA-9124A (Note 1)	8,712	1	Annually	8712	0.16	1394	\$9.06	\$12,629.64
Host Agency Customer Satisfaction – ETA-9124B (Note 1)	4,645	1	Annually	4645	0.13	604	\$24.15	\$14,586.60
Employer Customer Satisfaction – ETA-9124C1 (Note 1)	825	1	Annually	825	0.13	107	\$24.15	\$2,590.08

Senior Community Service Employment Program (SCSEP)

OMB Control No. 1205-0040

OMB Expiration Date: November 30, 2024

Activity	No. of Respondents (Note 1)	No. of Responses per Respondents	Frequency	Total Estimated Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetary Value of Respondent Time
Employer Customer Satisfaction – ETA-9124C2 (Note 1)	1800	1	Annually	1800	0.16	288	\$24.15	\$6,955.20
Participant Survey Pilot Project -- ETA-9124A (Note 2)	2100	1	Once	2100	0.13	273	\$9.06	\$2,473.38
Non-Host Agency Employer Survey Pilot Project -- ETA-9124C2 (Note 2)	750	1	Once if needed	750	0.16	120	\$24.15	\$2,898.00
Unduplicated Totals	18,832	1	Varies	18,832	Varies	2786	Varies	\$42,129.30

* 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, <https://www.bls.gov/web/empsit/cesseriespub.htm>).

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, Customer Satisfaction Surveys: The use of the ACSI remains unchanged for the performance measure, indicators of effectiveness in serving employers, host agencies, and project participants. The Department has revised the participant and host agency collection tools by adding one question. The Department has redesigned the employer survey and split it into two versions in order to reach a broader pool of employers and provide sufficient data for reporting this core measure for all grantees. Additionally, the Department is seeking to use digital surveys for two survey instruments and to pilot the use of digital surveys with two other survey instruments. Number of participant and host

agency respondents are actual counts from the PY 2021 surveys. As set forth above, these counts are expected to decrease each year.

Note 2, Customer Satisfaction Surveys: The pilot surveys would be administered in PY 2023 and would reduce the counts of the corresponding participant and employer surveys in that program year.

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 paper surveys are mailed with addressed, postage-paid return reply envelopes so respondents do not incur any cost to complete the surveys. The digital surveys do require an internet connection, but that should not result in any additional cost for the respondents -- host agencies and employers -- that complete the digital surveys. The burden on respondents to complete and return surveys is reduced by the use of digital surveys, eliminating the need to mail back the survey once it has been completed. Grantees, host agencies, and employers do not incur record keeping costs because the raw survey reports are held solely by the contractors and are not provided to DOL or the grantees.

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.*

SCSEP grantees are required by the OAA to pay the minimum wage within the state or locality where their authorized positions are awarded. The applicable minimum wage determines how many participants the grantees can enroll. Increasing minimum wages at the state and local level have resulted in fewer modified positions each year, which, in turn, means fewer host agencies and employers each year. As a result, the number of potential respondents for each of the surveys has declined.

The revision of the employer survey will increase the number of respondents by adding host agency employers and non-host agency employers that did not receive a substantial service, neither group having been surveyed previously. Non-host agency

employers that did receive a substantial service have always been surveyed. Their numbers have decreased for the reasons described above.

The timeline in this proposal has been adjusted to conform with the approval process in real time; grammatical changes were made to adjust to language to present tense and data has changed based on status of program to date.

In this request, other than those pertaining to the Customer Satisfaction Surveys, there are no other changes in the previous forms submitted under this ICR. We are replacing the current forms that expire November 2024 with forms bearing the new expiration date.

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 ACSI scores for each of the three surveys are part of the core performance measures and are required by law to be published with the other core performance measures. The method for calculating the ACSI scores is proprietary and requires the use of weights for each state provided by ASCI, LLC. See Part B. The data collection and reporting of the complete surveys results are conducted annually and provided only to DOL and the grantees.

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.