

**SUPPORTING STATEMENT FOR
Trade Adjustment Assistance Administrative Collection of States (TAAACS)
OMB CONTROL NO. 1205-0540**

This Information Collection Request seeks to extend this collection without change.

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.

Under Section 239(c) of Title II, Chapter 2 of the Trade Act of 1974, as amended (19 USC § 2271 et seq.), the Secretary has the authority to collect any data necessary to meet obligations specified under Chapter 2 of the Trade Act of 1974.

The proper administration of the TAA Program under Chapter 2 of the Trade Act of 1974 requires that the Department identify the range of state practices and organization to better understand the state strategies being employed to administer the program. The TAAACS is designed to provide a comprehensive collection of information regarding the organization and practices of State Workforce Agencies (SWAs) with regard to how the TAA Program is administered. The recent issuance of new regulations for the TAA program and the analysis of information provided under the first two collection rounds has identified the need for adjustments to the collection to better identify differences in the practices of SWAs.

This collection is designed to provide discrete data for analysis on SWA organization and practices to allow the Department to identify the practices currently being employed to administer the TAA program throughout the state workforce system. The collection is operated annually to provide updates responses so that the Department can identify revisions in the organization and practices of SWAs, update worker list metrics, and identify newly developing perceived barriers and areas where states believe they may have created promising practices.

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 submissions are used by Employment and Training Administration (ETA) staff to collect information regarding SWA administration and operations of the TAA Program to evaluate the range of state practices. This information is used to find co-variance between practices and efficiencies to target future evaluation of promising practices. Furthermore, this collection allows the Department to facilitate peer learning by pairing SWAs interested in making organizational changes with SWAs employing the practices they seek to implement. Failure to collect this

information would prevent the Department from identifying the most promising mechanisms SWAs are employing to administer the TAA Program.

Previous collections are used extensively to identify barriers and needs for technical assistance, compare outreach methodologies to promote peer learning and better design behavioral intervention studies, examine gaps in staffing based on state comparison, and identify states with IT modernization needs. The collection has reduced the burden for regional staff in providing monitoring of SWAs by allowing staff to quickly orient to a SWA's structure and note unique features in the organization of particular SWAs. Integration information is to assess state perceptions of their coordination with required state partners, shape co-enrollment policy and its implications, and identify gaps in knowledge for TAA staff. Information from this collection has allowed ETA to better identify peer states and is extensively used in technical assistance materials including numerous webinars in the last year alone.

In addition to the ETA utilization of this information, it has become apparent that asking states to assess these factors about their program administration has promoted critical rethinking of their processes including driving IT modernization efforts and expanding outreach methodologies.

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 collection is designed for use with standard, widely available spreadsheet software. The spreadsheet can be transmitted electronically to minimize burden. If respondents are unable to complete the collection electronically, a paper version of the collection can be made available and transmitted by email, fax, couriers, U.S. Postal Service, or a number of express delivery services to provide the correspondence.

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.

This information is not currently being collected in any other collections and its collection cannot be reasonably integrated into existing reporting systems which collect substantially different information on differing frequencies. There is no duplication for this collection.

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

The collection is for State grantees of the Department. No small businesses or small entities will be responding to the collection. Therefore, collection of this information does not have any impact on 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 Department needs the collection in order to understand the range of practices being employed to administer the TAA program and to identify co-variances between practices and program efficiency and performance metrics for future evaluation in the identification of best practices. The data collection occurs only once per year to minimize burden. Collection less frequently than each year would prevent the Department from identifying changes in state practices and operations and meaningfully matching outreach and worker list information.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

There are no special circumstances involved in this collection.

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 given 60-days to review and comment on this information collection by way of a *Federal Register* notice published on February 13, 2024, [89 FR 10100](#). There were no comments received during the comment period.

The Department regularly shares and discusses this information with our State partners during monthly Office Hours events and among various program offices within the Department on an as needed basis. No comments on burden or additional or revised content suggestions have been expressed to the Department during these exchanges.

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

There are no payments to respondents.

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

This information, in the form of a privacy statement, is provided to respondents on the information collection instruments:

“The U.S. Department of Labor will protect the privacy of the information you provide to the full extent of the law, in accordance with the Trade Act, 19 USC 2272(e)(3)(c), the Trade Secrets Act, 18 USC 1905, the Freedom of Information Act, 5 U.S.C. 552, and 29 CFR Parts 70 and 90.”

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.

The data collection includes no questions of a sensitive nature.

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. Generally, 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 14.**

The Department estimates this annual collection to have 52 respondents corresponding to the number of SWAs administering a TAA Program. This includes all 50 States, plus the Commonwealth of Puerto Rico and the District of Columbia. Further, the Department estimates the collection will take 360 minutes to complete based on feedback provided by twelve states during the previous approval process. There are no changes to the collection through this submission and therefore no changes to the burden statement.

The Department estimates a total annual cost of \$11,912.16. This estimate is based on a median hourly earnings of \$38.18 average hourly earnings for managerial and professional workers as reported in the BLS Current Population Survey, and assuming a 40-hour work week. Finally, SWAs are provided funding for administration and data reporting of the TAA Program that will fully cover personnel costs of this collection.

The following table can be used as a guide to calculate the total burden of an information collection.

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 Rate	Total Burden Cost
Collection Response	52	Once Annually	52	6	312	\$38.18	\$11,912.16
Unduplicated Totals	52	--	52	--	312	--	

** This estimate is based on a median hourly earnings of \$38.18 (2023 results) average hourly earnings for managerial and professional workers as reported in the BLS Current Population Survey, and assuming a 40 hour work week. See: <https://www.bls.gov/cps/cpsaat39.htm>*

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).

There are no capital or start-up costs involved in this collection. There is no maintenance or services required for this collection.

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.

This collection will be disseminated by transmitting the spreadsheet to known SWA program contacts for it to be returned, once complete, electronically. The dissemination, review, and analysis specific to this collection is expected to require less than eight (8) hours of time from program staff. This was estimated based on approximately five (5) minutes for staff to review each individual collection for completeness and accuracy (260 total minutes) plus thirty (30) minutes to construct a dataset from individual sheets plus one (1) hour to identify outliers and inconsistencies in the dataset. The Department anticipates a total of thirty (30) minutes spent correcting identified data issues for a total federal burden of 380 minutes (6 hours and 20 minutes).

The identification areas of technical assistance and best practice states has already led to a reduction in staff time of approximately twenty (20) hours annually.

The Department conservatively estimates a total annualized cost to the Federal Government of \$0 or a net reduction in work.

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

There are no changes to this collection.

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.

Some of the results of this collection are posted here:

<https://www.dol.gov/agencies/eta/tradeact/data/administration>

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 expiration date for OMB approval of the information collection will be displayed on the report form.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This collection does not utilize statistical methods.