

**SUPPORTING STATEMENT FOR
YouthBuild Work Site Description and Housing Census**

OMB CONTROL NO. 1205-0464

This ICR seeks to revise ETA-9143, the Work Site Description and Housing Census form.

The Work Site Description portion of ETA-9143 is completed as part of each grant application, and then on an as-needed basis by YouthBuild grantees, as they propose new work sites for training participants in construction skills. The Annual Housing Census portion of ETA-9143 is completed once annually by YouthBuild grantees to provide information on the number of affordable housing units built or renovated by YouthBuild participants. We have added an online option for the Annual Housing Census that reduces the submission burden in this information request package.

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 YouthBuild program is authorized under the Workforce Innovation and Opportunity Act of 2014 (PL 113-128), also known as WIOA. YouthBuild is designed to: enable disadvantaged youth to obtain the education and employment skills necessary to achieve economic self-sufficiency in occupations in post-secondary education and high-demand training opportunities; provide disadvantaged youth with opportunities for meaningful work and service to communities; foster the development of employment and leadership skills and commitment to community development among youth in low-income communities; and expand the supply of permanent affordable housing for homeless individuals and low-income families by utilizing the energies and talents of disadvantaged youth.

ETA-9143 is the result of a unique component of the YouthBuild program model which statutorily requires that programs engage in construction training on low-income work sites that provide sufficient hands-on experience to ensure youth participants have the skills to then succeed in subsequent construction career pathways.

Pub.L. No. 113-128, Sec 171 (The Workforce Innovation and Opportunity Act) addresses the construction training requirement for all YouthBuild grantees. The provisions of section 171:

- Requires that recipients of the YouthBuild grant expand the supply of permanent affordable housing for homeless individuals and low-income families by utilizing the energies and talents of disadvantaged youth [section 171(a)(4)]; and
- Ensures supervision and training for participants in the rehabilitation or construction of housing, including residential housing for homeless individuals or low-income families, or transitional housing for homeless individuals [section 171(c)(2)(B)].

ETA-9136 and ETA-9138 is no longer in use and all YouthBuild grantees will now use the WIOA-compliant reporting requirements, OMB Control No. 1205-0526 (ETA-9170 and ETA-9171) and OMB Control No. 1206-0521 (ETA-9172 and ETA-9179.)

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-9143 documents these low-income work sites to ensure compliance with Uniform Guidance on allowable costs on construction projects and the statutory requirements for construction training, while also allowing ETA to gather information on the impact of the program in increasing the supply of affordable housing.

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.

To comply with the Government Paperwork Elimination Act, web-based forms with instructions are provided to the grantees by ETA.

All ETA-9143 Work Site forms will continue to be submitted to ETA via E-mail. The ETA-9143 Work Site forms are reviewed by Regional Offices and the National Office before being approved, therefore, E-mail is the appropriate form for collection.

ETA is proposing the addition of a web-based submission option, i.e., Microsoft Forms in addition to E-mail for the ETA-9143 Housing Census form. Unlike the Work Site form, the Housing Census form is only reviewed by the National Office.

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.

For reporting purposes, the involvement of small businesses or other small entities that are not grantees or sub-grantees is extremely limited. The only time contacting them may be required is

during the provision of a service. Methods to minimize the burden on small entities that are grantees or subgrantees are discussed in other sections of this supporting statement.

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

The involvement of small businesses or other small entities that are not grantees or sub-grantees is extremely limited. The only time contacting them may be required is during the provision of a service. Methods to minimize the burden on small entities that are grantees or subgrantees are discussed in other sections of this supporting statement.

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 Funding Opportunity Announcements (FOA) requires that grantees report on intended construction work sites and the outcomes of those projects. If ETA did not comply with these requirements, funding for discretionary grant programs would be compromised.

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.**

There are no special circumstances that would require further explanation of the collection of information from the respondents.

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 allowed 60 days to comment through the Federal Register Notice posted on March 20, 2024 (89 FR 19883).

DOL received comments regarding the burden of completing the form, clarifying form instructions, providing confirmation of submission, and allowing for submission through the Grantee Performance Management System (GPMS) platform. The revised form reduces burden by adopting a simple fillable PDF format and clarifies instructions via edits and visual cues. DOL staff are developing a Standard Operating Procedure pending the approval of this form, which will include more timely and detailed feedback for submissions. The scope of the GPMS platform is limited to participant case management and performance reporting, so DOL will not pursue adding a submission option for this form within that platform.

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

Respondents receive no payments other than the grant funds described in the annual Funding Opportunity Announcement.

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

ETA will maintain the data in accordance with all applicable federal laws, with particular emphasis on compliance with the provisions of the Privacy and Freedom of Information Acts. The Department ensures the highest level of security whenever personally identifiable information is stored or transmitted.

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 a sensitive nature are asked.

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.**

Work Site Description, ETA-9143

- A. **Work Site Description:** As part of the grant application, prospective applicants are required to submit information about the work site(s) that will be used as training for YouthBuild participants using the Work Site Description form. Grantees are also required to submit this form at any point when they propose to utilize an additional work site during the period of performance to guarantee that the grantee has access to a suitable and qualifying work site property to use in the training of YouthBuild participants. They must submit unique forms for each work site proposed. This form includes information on estimated construction costs and sources of funding. The burden is estimated at 30 minutes per submission with one submission per prospective applicant; this burden, annualized over the three-year period of this request for extension, is 10 minutes per year.

Prospective Applicants

Activity	Average No. of Applicants *	Average Annual No. of Responses per Respondent	Total Responses	Average Annualized Hrs. Per Year Per Prospective Applicant Burden (Hours)	Annual National Total Burden (Hours)	Hourly Wage Rate	Annual National Total Burden Cost
Work Site Description	230	1	230	.17	39.1	\$19.90	\$778.09

*Based on the average number of applications received in ETA’s last three YouthBuild competitions.

ETA estimates that grantees will submit three work site forms over the course of the two years of active program services for each grant period of performance. The burden is estimated at 30 minutes per submission with three submissions per grantee; this burden, annualized over the three-year period of this request for extension, is 30 minutes per year.

Existing YouthBuild Grantees

Activity	No. of Grantees	Annualized No. of Responses per Grantee	Total Responses	Annualized Average Burden (Hours)	Annualized Total Burden (Hours)	Hourly Wage Rate	Annual Total Burden Cost
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Work Site Description	210	1	210	.5	105	\$19.90	\$2,089.50
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B. Housing Census Form: Grantees are required to submit information on the number of houses or apartment build or renovated by YouthBuild participants on an annual basis. The burden is estimated at 15 minutes annually.

Activity	No. of Grantees	Annualized No. of Responses per Grantee	Total Responses	Annualized Average Burden (Hours)	Annualized Total Burden (Hours)	Hourly Wage Rate	Annual Total Burden Cost
Housing Census Form	210	1	210	.25	52.5	\$19.90	\$1,044.75

TOTAL Activity	Number of Respondents	Number of Responses per Respondents	Total Responses	Annualized Average Burden (Hours)	Annualized Total Burden (Hours)	Hourly Wage Rate	Annual Total Burden Cost
Work Site Description (Prospective Applicants)	230	1	230	.17	39.1	\$19.90	\$778.09
Work Site Description (Existing Grantees)	210	1	210	.5	105	\$19.90	\$2,089.50
Housing Census Form	210	1	210	.25	52.5	\$19.90	\$1,044.75
Unduplicated Totals	650		650		196.6		\$3,912.34

*Hourly rates used to calculate cost depend upon the type of organization administering the program. For private non-profit grantees, the hourly rate is the average hourly earnings in the U.S. Bureau of Labor Statistics social assistance industry category (October 2023, Current Employment Statistics Survey, U.S. Bureau of Labor Statistics). Source: https://www.bls.gov/web/empsit/ceseeb8a.htm#ce_ee_table8a.f.2

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 startup 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.**

All costs are shown in Item 12 and 14. There are no additional burden costs.

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.

Table 4 - Cost of YouthBuild Reporting System Review to Federal Government

Continuing Operations Per Year to Support YouthBuild Reporting System	
5 GS-13 in Region 1 (1/20 time)	\$29,205.00
5 GS-13 in Region 2 (1/20 time)	\$28,448.00
5 GS-13 in Region 3 (1/20 time)	\$27,319.50
5 GS-13 in Region 4 (1/20 time)	\$28,085.25
5 GS-13 in Region 5 (1/20 time)	\$28,859.75
5 GS-13 in Region 6 (1/20 time)	\$32,179.25
1 GS-9 in National ETA Office (1/20 time)	\$3,420.25
2 GS-12 in National ETA Office (1/20 time)	\$9,920.00
1 GS-13 in National ETA Office (1/20 time)	\$5,898.10
1 GS-14 in National ETA Office (1/20 time)	\$6,969.75
Total Cost	\$200,304.85

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

The decrease in the overall burden is due to the addition of the web-based submission option for the ETA-9143 Housing Census form. This option reduces the burden for the Housing Census submission by .25 hours. Microsoft Forms will reduce submission errors that lead to increased burden.

YouthBuild will not be renewing ETA-9136, the *Standardized Quarterly Performance Report – YouthBuild Grant* and the ETA-9138, the *YouthBuild Case Management and Performance Management Information System*, therefore, the ICR title has changed to reflect the document that is being revised.

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.

Information from the Work Site and Housing Census forms are not published.

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 will be displayed.

18. Explain each exception to the certification statement.

No exceptions are requested.