

**SUPPORTING STATEMENT FOR
Veterans' Employment and Training Service Competitive Grant Programs Reporting**

OMB CONTROL NO. 1293-0014

This ICR seeks approval for a revision of the Competitive Grant Programs Reporting information collection.

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.

VETS is requesting approval for a revision of the Competitive Grant Programs Reporting information collection. On July 10, 2023, the Office of Management and Budget (OMB) approved an Emergency Clearance request for the collection of six (6) new questions in the VETS-701 Technical Performance Report (TPR) through January 31, 2024. These questions were added to comply with 38 U.S.C. § 2021 (as amended by Public Law 117-328 on December 23, 2022), which requires grant recipients to collect the period of military service, employment history, and housing status from participants enrolled in the program. Continued collection of this information ensures all veterans served by HVRP grant recipients are represented in the data aggregation and analysis used to assess the effectiveness of grant programs and submit reports to Congress.

The Homeless Veterans' Reintegration Program (HVRP) is authorized under 38 USC 2021. The Consolidated Appropriations Act 2023 (P.L. 117-328) was enacted on December 23, 2022. Title I of Division H, Section 303 § 2021(g) modified 38 USC 2021, in part, by expressly requiring grant recipients to collect the period of military service, employment history, and housing status from participants and to submit a report enumerating the number of veterans served to the Department no later than 90 days after the end of each program year, beginning with program year 2023.

See **Attachment A Citation List** for the full text of relevant sections of applicable statute and regulation.

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.

- **VETS -700 Planned Goals Chart:** an applicant calculation tool that captures proposed goals for the entirety of the grant's period of performance. If the applicant is selected, the goals displayed on this form will be used by VETS staff to assess grant progress.
- **VETS-704 Abstract:** collects and displays the most important metrics from an applicant's response to a Funding Opportunity Announcement (FOA). It enables FOA panelist reviewers and VETS staff to quickly compile responses into data sets for analysis and validates key geographic location information that assists in the selection of competitive grantees.
- **VETS-705 Chart of Past Performance:** The instructions, template, and examples provide a standard format for applicants that have never operated nor completed an HVRP grant within the last three program years to provide important information about a previous grant project that will demonstrate if and how the applicant successfully completed and managed the prior grant agreement. Past performance documentation is required for an applicant to be considered for an HVRP grant. Currently, VETS provides a suggested format for this documentation in the FOA, but applicants are not required to use it.

Grantees submit the following forms every quarter via email to their assigned VETS Grant Officer's Technical Representative (GOTR) throughout the grant's three-year period of performance.

- **VETS-701 Technical Performance Report (TPR):** a data collection and reporting tool for grantees to enter participant and project information. Responses are collected when participants enroll in the program, beginning with the start of the program year on July 1. The workbook allows VETS' GOTRs to monitor performance and enables the aggregation and analysis of grantee data to assess the effectiveness of grant programs and submit reports to Congress.
- **VETS-702 Technical Performance Narrative (TPN):** a form where grantees explain why actual performance results (as shown in the VETS-701) deviate from the planned goals (established in the VETS-700), describe remediation strategies to improve any performance failures, confirm financial management practices, provide updates on staffing information, communicate information about grant-related activities, identify significant achievements, and share success stories. VETS' GOTRs review the narrative details to monitor the overall performance of each grant.

Grantees that have completed Stand Down activities submit the following form via email to the VETS GOTR at the conclusion of the event.

- **VETS-703 Stand Down After Action Review (SDARR):** a form that summarizes the participation count, cost share, and types of services provided at an HVRP grant-funded Stand Down event. VETS staff use this information to track and assess the performance of each Stand Down.

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 VETS-700 Planned Goals Chart, VETS-701 TPR, and VETS-704 Abstract forms are in Microsoft Excel binary workbook file formats, the VETS-702 TPN and VETS-703 SDAAR, are in fillable Adobe PDF formats. The VETS-705 Chart of Past Performance is a Microsoft Word document. Blank forms are available for download via publicly accessible websites.

The VETS-700, VETS-704, and VETS-705 are available as part of the HVRP Funding Opportunity Announcement (FOA) on Grants.gov and submitted electronically as part of the package in accordance with the FOA instructions. The VETS-701, VETS-702, and VETS-703 forms are hosted on the DOL VETS HVRP public website and are submitted electronically via email to the VETS GOTR.

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.

There are no duplicative forms in this request. The information collected in the VETS-700 series of forms does not duplicate other data collected through other Department of Labor OMB-approved information collection. A search of the published application forms and Federal reports via www.reginfo.gov indicates that these forms and reports do not duplicate any similar information collections currently in use by other Federal departments.

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

The 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-700 Planned Goals Chart, VETS-704 Abstract, and VETS-705 Chart of Past Performance are submitted once per application and provide a framework to assist grant applicants as they submit required performance and project information. The forms prevent applicants from expending unnecessary time and resources supplying extraneous or irrelevant information during the application process. There are no opportunities to conduct these form collections less frequently.

The VETS-701 TPR and VETS-702 TPN are required on a quarterly basis. These forms ensure the required project information is consistent throughout the grant's three-year period of performance and across all HVRP grants within a single program year.

The VETS-703 SDAAR form is completed once per Stand Down grant award. The form is due 30 days after the end of the quarter in which the Stand Down event took place, aligning the submission deadline with the VETS-701 TPR and VETS-702 TPN.

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 USC §2021(b) and 38 USC §2021A(c). Further, without these collections, the Secretary of Labor would not have the information needed to report to Congress in accordance with 38 USC §2021(d) and 38 USC §2021A(e).

Without these forms, VETS would also be unable to meet its fiduciary and programmatic oversight obligations. The grant application forms establish the grantee's key project information and performance goals at the time of award and the quarterly reporting forms provide periodic progress updates as required by 2 CFR §200.301 and 29 CFR 95.51.

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 confidentially to the extent permitted by law.**

None.

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.

VETS published a Federal Register Notice on June 25, 2023 (88 FR 47918), notifying the public of its intent to revise this information collection. The comment period closed on September 25, 2023. VETS received no comments.

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

No payments or gifts are provided to respondents.

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

Not applicable.

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 U.S. House of Representatives Appropriations Committee Report directed the Department to collect data on LGBTQ populations and gender identity. The information will be used to "... track departmental expenditures within the Homeless Veteran Programs, specifically with regard to minority, female, and LGBTQ populations. Where available, the Department shall disaggregate data by ethnicity, age, gender identity, and discharge status." Title I - Department of Labor, General Provisions, DEPARTMENTS OF LABOR, HEALTH AND HUMAN SERVICES, AND EDUCATION, AND RELATED AGENCIES APPROPRIATIONS BILL, 2021, Report, 116-450, page 39.

The VETS adopted the sexual orientation and gender identity (SOGI) data best practices outlined in a June 2022 recommendations report for federal agencies (<https://www.whitehouse.gov/wp-content/uploads/2023/01/SOGI-Best-Practices.pdf>), to include the number of questions and a two-step approach to measuring gender.

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.¹**
- **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.**

¹ Indicate the retention period for any recordkeeping requirements that pertain to the ICR.

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	Monetized Value of the Time Burden
All Applicants							
VETS-700 PGC	147	1	147	1.0	147.0	\$51.63	\$7,590
VETS-704 Abstract	147	1	147	1.0	147.0	\$51.63	\$7,590
<i>Unduplicated Total</i>	294	2	294	2.0	294.0	\$51.63	\$15,179
Applicants that did not complete a previous HVRP grant within the past 3 years							
VETS-705 CPP (Unduplicated Total)	59	1	59	0.5	30.0	\$51.63	\$1,523
VETS-701 TPR All Grantees							
New Grants Q1-Q4	57	4	228	14.25	3,249.0	\$35.69	\$115,957
Continuing Grants Q1-Q4	117	4	468	7.25	3,393.0	\$35.69	\$121,096
New Grants Q5-Q8	0	0	0	0	0	\$0.00	\$0.00
Continuing Grants Q5-Q8	117	4	468	2.0	936.0	\$35.69	\$33,406
<i>TPR Unduplicated Total</i>	291	12	1,164	23.5	7,578.0	\$35.69	\$270,459
VETS-702 TPN All Grantees							
New Grants Q1-Q4	57	4	228	4.0	912.0	\$35.69	\$32,549
Continuing Grants Q1-Q4	117	4	468	4.0	1,872.0	\$35.69	\$66,812
New Grants Q5-Q8	0	0	0	0	0	\$0.00	\$0.00
Continuing Grants Q5-Q8	117	4	468	1.0	468.0	\$35.69	\$16,703
<i>TPN Unduplicated Total</i>	291	12	1,164	9.0	3,252.0	\$35.69	\$116,064
Grantees awarded Stand Down funding							
VETS-703 SDAAR (Unduplicated Total)	35	1	35	0.75	26.0	\$35.69	\$937
Unduplicated Total for this ICR							
Unduplicated Total All	970	28	2,716	N/A	11,180.0	N/A	\$404,162

*Hourly rate for applicants is based on the Department's Bureau of Labor Statistics' series titled "Occupational Employment and Wage Statistics." The \$51.63 hourly wage rate assigned to the VETS-700, VETS-704, and VETS-705 was derived from the median hourly wage for Fundraising Managers, published May 2022. <https://www.bls.gov/oes/current/oes112033.htm>

*The \$35.69 hourly wage rate for grantees was derived from the median hourly wage for Social and Community Service Managers, published May 2022. <https://www.bls.gov/oes/current/oes119151.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).

- **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. 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 this format, it represents a savings to the federal government. Without collecting the information in a standardized 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.

There are no changes from the approved Emergency Clearance ICR.

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 results of this information collection are published in the VETS Annual Report to Congress.

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.

Not applicable.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

There are no statistical methods in this collection.