

**SUPPORTING STATEMENT FOR
Workforce Innovation and Opportunity Act Joint Quarterly Narrative Performance
Report**

OMB CONTROL NO. 1205-0448

This ICR seeks approval of a revision to a current information collection request (ICR) titled “Workforce Innovation and Opportunity Act Joint Quarterly Narrative Performance Report” (OMB Control No. 1205-0448). This ICR expires on May 31, 2024.

This ICR revises and updates the following aspects of the information collection:

- ETA has added Dislocated Worker Demonstration grants, which includes Community Projects, Strengthening Community Colleges Training, and Workforce Opportunity for Rural Communities grants, to the list of grant programs which use the Workforce Innovation and Opportunity Act (WIOA) Joint Quarterly Narrative Performance Report (referred to as the “Joint QNR” in this document).
- Minor edits have been made to the Joint QNR Template for streamlining and clarification purposes.
- Non-substantive changes were made to the Senior Community Service Employment Program (SCSEP) data validation.

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 allows ETA’s Senior Community Service Employment Program (SCSEP) to perform data validation on data collected and reported to ETA on program activities and outcomes; and provides a streamlined joint quarterly narrative performance report template to support the reporting and program evaluation requirements for the following grant programs: National Dislocated Worker Grants (DWG), H-1B grant programs, National Farmworker Jobs Program (NFJP), Reentry Employment Opportunities (REO), SCSEP, YouthBuild, and Office of Apprenticeship grant programs.

Senior Community Service Employment Program (SCSEP) Data Validation

The SCSEP data validation process assesses the accuracy of data collected and reported to ETA on program activities and outcomes. The accuracy and reliability of program reports submitted by states and grantees using federal funds are fundamental elements of good public administration and are necessary tools for maintaining and demonstrating system integrity. The data validation requirement for employment and training programs strengthens the workforce

system by ensuring that accurate and reliable information on program activities and outcomes is available.

Grantees receiving funding under Title V of the Older American Act are required to maintain and report accurate program and financial information (20 CFR 641.879). Further, grantees receiving SCSEP funding from ETA are required to submit reports or participant data and attest to the accuracy of these reports and data.

To meet the Agency's commitment to accurate and reliable data, ETA implemented a data validation requirement to ensure the accuracy of data collected and reported on program activities and outcomes.

ETA has developed a process for validating data submitted by states and grantees. Data validation consists of two parts:

- 1) **Report validation.** ETA assures the validity of SCSEP aggregate reports by using the Department of Labor (DOL) provided case management system to automatically generate the grantee-level aggregate reports based on the grantee's individual record files entered into the system and the performance reporting specifications for the quarterly and final year-end report. Edit checks built into the system assure the validity of SCSEP's performance reports. No additional approval is sought for SCSEP report validation.
- 2) **Data element validation** appraises the accuracy of the data entered into the SCSEP Performance and Reporting System. Data element validation is conducted by manually reviewing annual samples of participant records with respect to their underlying source documentation in an effort to (1) confirm the accuracy of the data contained in the automated system and (2) affirm compliance with program-specific federal definitions and requirements. The results of data element validation are used to identify areas on which to focus system and grantee resources in order to systematically improve program management over time.

This approach addresses the two fundamental sources of reporting errors within ETA program data: (1) data collection or entry error; and (2) inaccurate computation of the required aggregate reports at the grantee level. If the data collected are systematically incorrect or data entry errors routinely occur, then the performance information will not be accurate even though the DOL provided case management system is used to produce the aggregate reports. Data element validation addresses this issue by comparing performance-related data in each grantee's participant record files to the original data in the source files and determining an error rate that indicates the degree of accuracy of each data element used in calculating the grantee's performance results, eligibility determinations, or reported compliance with program requirements.

SCSEP program staff has been conducting data validation since 2007. Program staff received training prior to the implementation of data validation and continue to receive ongoing training

and technical assistance from ETA's data validation contractor and program staff throughout the validation process. Previous experience with data validation has indicated the following:

- Grantees are able to conduct data validation with a reasonable, but sustained, level of effort.
 - The validation process allows grantees to identify and address reporting errors.
- On the basis of the significant benefits of data validation along with its minimal burden going forward, ETA seeks to extend the existing data validation requirement for SCSEP.

SCSEP grantees use the DOL provided case management system to access all information required for data element validation, to enter their validation of each data element, and to generate reports of the results of their validation. The SCSEP Data Validation Handbook and Data Collection Handbook provide a more detailed explanation of the validation process and provide standards and specifications for each data element required to be validated. These handbooks are made available electronically through the Older Worker Community of Practice (olderworkers.workforcegps.org).

Joint Quarterly Narrative Performance Report (Joint QNR)

The WIOA Joint Quarterly Narrative Performance Report (Joint QNR) provides a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter. It also provides information on grant challenges and timeline progress, as well as the opportunity to share success stories. Prior to the use of the Joint QNR, grantees provided quarterly narrative reports through several ETA-provided, Web-based management systems, or by email to Federal Project Officers when such systems did not exist. The continued use of a standardized narrative report supports WIOA implementation and the goal of systems alignment and consistency of reporting. This template also helps ensure consistent identification of technical assistance needs across the discretionary programs that are reporting on WIOA performance indicators and contributes to the receipt of quality performance information. All data collection and reporting are done by ETA grantee organizations (including, but not limited to: state or local governments, not-for-profit organizations, or faith-based and community organizations, and educational institutions) or their sub-grantees.

NFJP and YouthBuild grants are authorized under the Workforce Innovation and Opportunity Act of 2014 (PL 113-128). The WIOA encompasses comprehensive legislation reforms and modernized the public workforce system and reaffirms the role of the public workforce system, and enhances several key employment, education, and training programs. The WIOA identified performance accountability requirements for NFJP and YouthBuild grants, and these performance indicators and reporting requirements also apply to the DWG program. While H-1B, REO, and Apprenticeship grants are not authorized under WIOA, these programs have adopted the WIOA performance indicators and align with WIOA data element definitions and reporting templates to promote consistency across these DOL-funded programs. SCSEP, authorized under the Older Americans Act, as amended (PL 114-144), as described previously, has also adopted some of the WIOA performance measures and for this reason, has adopted the WIOA Joint QNR.

To support these legislative requirements, in applying for the DWG, DWG Demo, H-1B, NFJP, REO, SCSEP, YouthBuild and Apprenticeship grants, grantees submit participant-level data quarterly for individuals who receive services through these programs. The reports include aggregate data on demographic characteristics, types of services received, placements, outcomes, and follow-up status using shared data elements. Using a shared narrative template furthers the WIOA legislative requirements and ensures that grantees are fully describing WIOA-related activities that ensure strong performance management.

The Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”) streamlines the federal government's guidance on grant management and placed requirements on specific information that grantees should report to their federal funders. The use of a Joint QNR template ensures that each of these grant programs is meeting the Uniform Guidance requirements related to narrative grant reporting as laid out in the Final Rule.

ETA uses data collected from the Joint QNR to demonstrate to Congress and the public the progress and success of these grants; hold grantees accountable for the federal funds they receive; and support oversight, management, and technical assistance efforts.

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 uses SCSEP data validation results to evaluate the accuracy of data collected and reported to ETA on program activities and outcomes. This information collection enables ETA to assure its customers, partners, and stakeholders of the validity of performance data underlying this program.

Additionally, ETA uses the information collected in the Joint QNR to ensure grantees are effectively managing their programs, meeting the milestones and objectives as described in their grant statements of work, and to identify areas where grantees may need additional technical assistance or monitoring. These reports also help ETA to identify promising grant practices across multiple ETA programs.

Within ETA, the reports may be used by the Offices of the Assistant Secretary, Workforce Investment, Policy Development and Research, Financial Administration, Apprenticeship, and the Regional Offices. Other DOL users include the Office of the Assistant Secretary for Policy, and the Chief Evaluation Office.

The reports and other analyses of the data are made available to the public through publication and other appropriate methods, and to the appropriate congressional committees through copies of such reports, including ETA’s Quarterly Workforce System Results Report.

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.

Senior Community Service Employment Program (SCSEP) Data Validation

The DOL provided case management system is used for all components of SCSEP data validation:

- The DOL provided case management system generates samples, worksheets, and reports on data accuracy. For report validation, the system is used to automatically generate the aggregate reports that are accessible to grantees. For data element validation, the system generates a random sample of the participant records and data elements for the grantee to validate. The system produces worksheets on which the validator records information after checking the source documentation in the sampled case files. The system calculates error rates for each data element, with confidence intervals varying with the size of the sample, from 3.5 percent to 4 percent. Details of the Data Validation sampling is provided in Part B.
- User handbooks are available that provide detailed information on completing data element validation. The Data Validation Handbook also explains the validation methodology, including sampling specifications and validation instructions for each data element to be validated. The Data Validation Handbook is updated each program year in response to questions from and issues identified by the grantees.

Currently, all SCSEP grantees use the data validation page within the DOL provided case management system to conduct validation. SCSEP grantees can obtain technical assistance on validation procedures and the use of the validation tools from ETA's data validation contractor and national office staff. The system uses the validation data already provided by the grantees to produce validation summary reports.

Joint Quarterly Narrative Performance Report (Joint QNR)

To comply with the Government Paperwork Elimination Act, ETA has streamlined the collection of participant data and the preparation of quarterly reports to the extent feasible by providing uniform expectations of narrative information that should be shared across grant programs. The Joint QNR is submitted to ETA via existing reporting systems or via email to the assigned Federal Project Officer to align with the above objective.

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.

The Department holds grantees accountable by requiring them to identify and work toward comprehensive performance standards that are validated, and by establishing quarterly reports for competitive projects. WIOA and the Uniform Guidance provide reporting requirements for grantees. The Joint QNR is a template to ensure adherence to these requirements. Neither the SCSEP data validation requirement nor the narrative performance report duplicates any existing ETA requirement.

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

For reporting and data validation purposes, the involvement of small businesses or other small entities that are not grantees or sub-grantees is extremely limited. Information collection from small businesses or other small entities is typically only required as part of the provision of a grant-related service to a grantee.

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.

Senior Community Service Employment Program (SCSEP) Data Validation

ETA regional staff continues to conduct data quality reviews based on current SCSEP data validation efforts to determine if grantees are in compliance with data validation guidelines. The continuation of the data validation requirement will allow SCSEP to continue to address these issues. If data validation is discontinued, SCSEP will not be able to ensure that critical data used for performance reports and accountability purposes, and for other management purposes, are reliable.

Joint Quarterly Narrative Performance Report (Joint QNR)

2 CFR 200.328 (78 F.R. 78589, December 26, 2013), which governs monitoring and reporting program performance under grants and agreements, states that DOL shall prescribe the frequency with which performance reports shall be submitted, and that performance reports shall not be required more frequently than quarterly or, less frequently than annually. If ETA does not comply with these requirements, funding for demonstration programs would be compromised. In applying for grants from the programs described in the Section A1, grantees agree to meet ETA's reporting requirements, which requires the submission of quarterly reports within 45 days after the end of the quarter.

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.**

This ICR 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.

In accordance with the Paperwork Reduction Act of 1995, the public was allowed 60 days to comment through the Federal Register Notice posted on December 8, 2023 (88 FR 85655). There were no public comments.

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

This information collection does not involve direct payments to respondents.

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

Senior Community Service Employment Program (SCSEP) Data Validation

Participant record layouts used in data validation for SCSEP utilize unique individual identifiers rather than Social Security Numbers (SSNs). To protect the privacy of program participants, the validation system never receives an SSN and includes user functionality that allows program administrators to limit access to data validation information. Only validators designated by the program administrator have access to validate records. No other means of access to these data is permitted.

Joint Quarterly Narrative Performance Report (Joint QNR)

For the Joint QNR, no individual-level data is requested under the report. The Joint QNR involves the receipt and review of aggregate-level narrative information submitted to ETA and so contains no private information. While this information collection makes no express assurance of confidentiality, ETA is responsible for protecting the privacy of participant and performance data and 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. This data is covered by a System of Records Notice, DOL/ETA-15, published April 8, 2002 (67 FR 16898 et seq).

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 completion of the SCSEP data validation and the Joint QNR is estimated to require an annual burden of 64,951 hours. See Table 1 below for additional information.

Joint QNR burden involves providing a detailed account of all activities undertaken during the quarter including in-depth information on accomplishments, promising approaches, progress toward performance outcomes, and upcoming grant activities. ETA assumes each grantee will spend approximately ten hours per quarter preparing this report.

ETA calculated the estimated number of grantees based on the number of active DWG, DWG Demo, H-1B, NFJP, REO, SCSEP, YouthBuild, and Apprenticeship grants over the life of these reporting requirements, if approved.

Table 1 – Annual Estimation of National Burden Hours

Report	Hours per Year per Grantee	Estimated Number of Grantees	Annual National Burden Hours
SCSEP Annual Data Validation	162 (40.5 hours per grantee review x 4 quarters)	75	12,150
Quarterly Narrative Performance Report – DWG	40 (10 hours per quarterly report x 4 quarters)	63	2,520
Quarterly Narrative Performance Report – DWG Demo	40 (10 hours per quarterly report x 4 quarters)	518	20,720
Quarterly Narrative Performance Report – H-1B	40 (10 hours per quarterly report x 4 quarters)	142	5,680
Quarterly Narrative	40 (10 hours per	62	2,480

Performance Report – NFJP	quarterly report x 4 quarters)		
Quarterly Narrative Performance Report – REO	40 (10 hours per quarterly report x 4 quarters)	127	5,080
Quarterly Narrative Performance Report – SCSEP	40 (10 hours per quarterly report x 4 quarters)	75	3,000
Quarterly Narrative Performance Report – YouthBuild	40 (10 hours per quarterly report x 4 quarters)	200	8,000
Quarterly Narrative Performance Report – Apprenticeship	40 (10 hours per quarterly report x 4 quarters)	133	5,320
TOTALS		1,395	64,951

Table 2 – Calculation of Combined Annual Burden for SCSEP Data Validation and Joint Quarterly Narrative Performance Report

Activity	Number of Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden Hours	Total Burden Hours	Hourly Wage Rate*	Total Burden Cost**
SCSEP Data Validation	75	4	300	40.5	12,150	\$23.81/ \$40.09	\$436, 983.55
Quarterly Narrative Performance Report - SCSEP	75	4	300	10	3,000	\$23.81/ \$40.09	\$107, 897
Unduplicate d Totals	150	4	600		15,150		\$544,880.55

* 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://data.bls.gov/cgi-bin/srgate>). 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>). Calculation was done by taking the average weekly earnings for all three levels of government and then divided that by 40 hours.

***Monetized Value of Respondent Time for SCSEP Data Validation includes a combined total of 19 respondents at \$23.81 hourly rate and 56 respondents at \$40.09 hourly rate (see Table 3). Monetized Value of Respondent Time for Quarterly Narrative Performance Report includes combined total of 19 respondents at \$23.81 hourly rate and 56 respondents at \$40.09 hourly rate (see Table 4).*

Table 3 –Calculation of Annual Burden for Grantees for SCSEP Data Validation

Type of Grantee	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	19	4	76	40.5	3078	\$23.81	\$73, 287.18
State, Local, or Tribal Government	56	4	224	40.5	9072	\$40.09	\$363, 696.48
SCSEP Total	75	4	300	40.5	12150	\$23.81/ \$40.09	\$436, 983.66

Table 4 – Calculation of Annual Burden for Grantees for Joint Quarterly Narrative Performance Report and SCSEP Data Validation

Grant Program (DWG)	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value
Private Sector	4	4	236	10	160	\$23.81	\$3, 810
State, Local, or Tribal Government	59	4	16	10	2360	\$40.09	\$94,612
Total	63	4	252	10	2520	varies	\$98,422
Grant Program (DWG Demo)	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value
Private Sector	228	4	912	10	9120	\$23.81	\$217,147
State, Local, or Tribal Government	290	4	1160	10	11600	\$40.09	\$465,044
Total	518	4	2072	10	20720	varies	\$682,191
Grant Program (H-1B)	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value
Private Sector	51	4	204	10	2040	\$23.81	\$48,572
State, Local, or Tribal Government	91	4	364	10	3640	\$40.09	\$145,928

Total	142	4	568	10	5680	varies	\$194,500
Grant Program (NFJP)	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value
Private Sector	61	4	244	10	2440	\$23.81	\$58,096
State, Local, or Tribal Government	1	4	4	10	40	\$40.09	\$1,604
Total	62	4	248	10	2480	varies	\$59,700
Grant Program (REO)	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value
Private Sector	97	4	388	10	3880	\$23.81	\$92,383
State, Local, or Tribal Government	30	4	120	10	1200	\$40.09	\$48,108
Total	127	4	508	10	5080	varies	\$140,491
Grant Program (SCSEP)	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value
Private Sector	19	4	76	10	760	\$23.81	\$18,096
State, Local, or Tribal Government	56	4	224	10	2240	\$40.09	\$89,802
Total	75	4	300	10	3000	varies	\$107,897
Grant Program (SCSEP QNR)	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value
Private Sector	19	4	76	40.5	3078	\$23.81	\$73,287.18
State, Local, or Tribal Government	56	4	224	40.5	9072	\$40.09	\$363,696.48
Total	75	4	300	40.5	12,150	varies	\$436,983.66
Grant Program (YouthBuild)	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value
Private Sector	100	4	400	10	4000	\$23.81	\$95,240
State, Local, or Tribal Government	100	4	400	10	4000	\$40.09	\$160,360
Total	200	4	800	10	8000	varies	\$255,600
Grant Program (Apprenticeship)	No. of Grantees (Respondents)	Reports per year per Grantee	Total Annual Reports	Hours per Report	Total Hours	Rate in \$/hr.	Monetized Value

Private Sector	35	4	140	10	1400	\$23.81	\$33,334.00
State, Local, or Tribal Government	98	4	392	10	3920	\$40.09	\$157,152.80
Total	133	4	532	10	5320	varies	\$190,486.80
All Grantees Total	1,320	4	5,580	varies	64,950	varies	\$2,166,271.46

Table 5 – Calculation of Annual Burden for DWG for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	4	16	40 (per grantee)	\$23.81	\$3,810
State, Local, or Tribal Government	59	236	40 (per grantee)	\$40.09	\$94,612
All Grantees	63	252		--	\$98,422
Avg. Per Grantee	--		40	--	\$2,460.55

Table 6 – Calculation of Annual Burden for DWG Demo for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	228	912	40 (per grantee)	\$23.81	\$217,147
State, Local, or Tribal Government	290	1,160	40 (per grantee)	\$40.09	\$465,044
All Grantees	518	2,072		--	\$682,191
Avg. Per Grantee	--		40	--	\$17,054.78

Table 7 – Calculation of Annual Burden for H-1B for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Total Annual	Hours	Rate in \$/hr.	Monetized Value
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		Responses			
Private Sector (Non-Profits)	51	204	40 (per grantee)	\$23.81	\$48,572
State, Local, or Tribal Government	91	363	40 (per grantee)	\$40.09	\$145,928
All Grantees	142	568		--	\$194,500
Avg. Per Grantee	--		40	--	\$4,862.50

Table 8 – Calculation of Annual Burden for NFJP for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	61	244	40 (per grantee)	\$23.81	\$58,096
State, Local, or Tribal Government	1	4	40 (per grantee)	\$40.09	\$1,604
All Grantees	62	248		--	\$59,700
Avg. Per Grantee	--		40	--	\$1,492.50

Table 9 – Calculation of Annual Burden for REO Youth and Adult Demo for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	97	388	40 (per grantee)	\$23.81	\$92,383
State, Local, or Tribal Government	30	120	40 (per grantee)	\$40.09	\$48,108
All Grantees	127	508		--	\$140,491
Avg. Per Grantee	--		40	--	\$3,512.28

Table 10 – Calculation of Annual Burden for SCSEP for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	19	76	40 (per grantee)	\$23.81	\$18,096
State, Local, or Tribal Government	56	224	40 (per grantee)	\$40.09	\$89,802
All Grantees	75	300		--	\$107,897
Avg. Per Grantee	--		40	--	\$2,697.43

Table 11 – Calculation of Annual Burden for YouthBuild for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Total Annual Responses	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	100	400	40 (per grantee)	\$23.81	\$95,240
State, Local, or Tribal Government	100	400	40 (per grantee)	\$40.09	\$160,360
All Grantees	200	800		--	\$255,600
Avg. Per Grantee	--		40	--	\$6,390

Table 12 – Calculation of Annual Burden for Apprenticeship for Joint Quarterly Narrative Performance Report

Type of Grantee	No. of Grantees	Total Annual Responses¹	Hours	Rate in \$/hr.	Monetized Value
Private Sector (Non-Profits)	35	140	40 (per grantee)	\$23.81	\$33,334
State, Local, or Tribal Government	98	392	40 (per grantee)	\$40.09	\$157,152.80
All Grantees	133	532		--	\$190,486.80
Avg. Per Grantee	--		40	--	\$4,762.17

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.**

a) Start-Up/Capital Costs: There are no start-up costs, as the Joint Quarterly Narrative Performance Report is developed using basic word processing software and submitted via existing web-based reporting systems or via email.

b) Annual Costs: There are no annual costs, as ETA is already providing access to the web-based reporting platforms as covered under separate Information Collection Requests or submission via the existing DOL email server.

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.

Federal costs are the staff costs required to review submissions of quarterly narrative performance reporting as outlined in Table 12 below. Costs for ETA staff to support SCSEP data validation and review quarterly narrative performance reports submissions will be \$202,040 per year for continuing operations.

Table 13 - Cost of SCSEP Data Validation and Quarterly Narrative Performance Review Reporting to Federal Government

Continuing Operations Per Year to Support SCSEP Data Validation and Quarterly Narrative Report Submission	
2 GS-13 in Region 1 (1/20 time)	\$11,682
3 GS-13 in Region 2 (1/20 time)	\$17,059
4 GS-13 in Region 3 (1/20 time)	\$21,856
4 GS-13 in Region 4 (1/20 time)	\$22,468
2 GS-13 in Region 5 (1/20 time)	\$11,544
7 GS-13 in Region 6 (1/20 time)	\$45,051
4 GS-13 in National ETA Office (1/20 time)	\$23,592
7 GS-14 in National ETA Office (1/20 time)	\$48,788
Total Cost	\$202,040

Note: Staff costs are based on the relevant locality pay for Salary Tables as available in the 2024 General Schedule (GS) Locality Pay Tables (Step 1 plus the locality pay areas for each regional office and the Washington-Baltimore-Norther Viginia, DC-VA-WV-PA region for the national ETA office staff. See <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-schedule/>.

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

Senior Community Service Employment Program (SCSEP) Data Validation

There are no program changes from the previously approved SCSEP data validation.

Joint Quarterly Narrative Performance Report (Joint QNR)

For the WIOA Joint Quarterly Narrative Performance Report, this revision reflects the addition

of the DWG Demo grant program's use of the instrument and updated grantee/respondent totals, associated burden hours and costs to align with the existing grant programs. The burden has increased due to the addition of the DWG Demo grant programs and the adjustment to other existing grant programs.

Updated rates shown on the burden calculation tables reflect the latest available GS pay Scale tables and the latest BLS data which was updated since the publishing of the 60-day FRN.

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.

Senior Community Service Employment Program (SCSEP) Data Validation

SCSEP publishes the results of data validation in an annual validation report.

Joint Quarterly Narrative Performance Report (Joint QNR)

Grantees will submit the Joint QNRs on a quarterly basis to ETA through the reporting system or via email if no reporting system is provided, within 45 days of the end of each quarter. Quarterly report data will be analyzed by ETA staff and used to evaluate performance outcomes and program effectiveness.

Each quarter, ETA issues the Quarterly Workforce System Results. Data and other information contained in the narrative reports may be included in these reports. The data may also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports, as needed.

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.

There are no exceptions to the certification statement.