

**Supporting Statement for Emergency ICR Approval:
Collecting Aggregate Participant Counts for Workforce Investment Act Title
IB, Wagner-Peyser Act, National Emergency Grants, and Reemployment
Services Grants and Workforce Investment Act Title IB Individual Records on
a Quarterly Basis**

A. Justification

A-1. Reasons for Data Collection.

The American Recovery and Reinvestment Act of 2009 (The Recovery Act) was signed into law by President Obama on February 17, 2009—Division A Title VIII, P.L. 111-5. The Recovery Act is intended to preserve and create jobs, promote the nation’s economic recovery, and assist those most impacted by the recession. The Recovery Act provides the U.S. Department of Labor and the public workforce investment system with unprecedented levels of funding for a number of employment and training programs to help American workers acquire new skills and get back to work. The programs impacted by the Act include Workforce Investment Act (WIA) Title IB; Wagner-Peyser Act, including Reemployment Services Grants; and National Emergency Grants.

A-2. Users, Purposes, and Consequences of Failure to Collect the Information.

If the workforce system is to meet both the letter and the spirit of the law and fulfill its critical role in the U.S. economic recovery, the Employment and Training Administration (ETA) must implement the Recovery Act expeditiously and effectively, with full transparency and accountability at all levels. To that end, this request for emergency ICR approval is to modify the frequency of reporting and request the collection of some additional data elements¹ covered under the following two approved performance related collection instruments:

¹ The additional data elements include:

- Individual participant records (WIA Title IB Programs)
- Number of participants enrolled in another WIA program (Recovery Act WIA Youth program)
- Number of out-of-school youth age 22-24 (Recovery Act WIA Youth program)
- Work readiness attainment rate (Recovery Act WIA Youth program)
- Summer employment completion rate (Recovery Act WIA Youth program)
- Distinction between staff-assisted services versus those that are provided virtually (Wagner Peyser Act Program)
- Referral to training, including WIA-funded training (Reemployment Services Grants)

- (1) OMB Control Number 1205-0420—Workforce Investment Act (WIA), Title I Adult, Dislocated Worker and Youth Activities Programs. This control number includes the following ETA forms: (A) Workforce Investment Act Annual Report—ETA form 9091, (B) Workforce Investment Act Quarterly Report—ETA Form 9090, and (C) Workforce Investment Act Standardized Record Data—WIASRD
- (2) OMB Control Number 1205-0240—Wagner-Peyser and Veterans' Employment and Training Services (VETS) Programs. This control number includes the following ETA forms: (A) ETA 9002 Report and (B) VETS 200 Report.

Failure to report timely performance results related to the use of Recovery Act funds would be in violation of section 1512 (Reports on the use of funds) of the Act. Subpart C of section 1512 states: "RECIPIENT REPORTS.—Not later than 10 days after the end of each calendar quarter, each recipient that received recovery funds from a Federal agency shall submit a report to that agency."

A-3. Technology and Obstacles Affecting Reporting Burden.

In order to comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of WIA participant data by using technology to the extent feasible and by providing uniform data elements and data definitions to states. All Recovery Act reports will be submitted to ETA using a web-based form through a secure Internet website. However, states and local areas are to continue to decide the best technology for collecting individual case management data given their unique circumstances and resources availability.

A-4. Duplication.

To minimize the reporting burden, most of the proposed data elements are currently collected on participants and reported to ETA either on a quarterly basis (Wagner-Peyser Act Program and Reemployment Services Grants) or on an annual individual record basis (WIA Programs and National Emergency Grants). To meet the Recovery Act's reporting requirements, ETA proposes that aggregate participant counts be reported to ETA on a monthly basis to improve timeliness and transparency of the data. For the WIA programs only, ETA also proposes that individual records (WIASRD) for both participants and exiters be provided to ETA on a quarterly basis. There is no change to the approved quarterly performance reporting requirements for these programs or to the approved annual performance report for WIA.

A-5. Small Business.

This collection does not impact small businesses.

A- 6. Consequences of Less Frequent Data Collection.

Although the Workforce Investment and Wagner-Peyser Acts are very specific about reporting requirements and reporting frequency, they do not contain reporting contingencies related to temporary funding increases. If the Department did not comply with the reporting requirements contained within this request, future funding for these programs may be compromised. Consequences of not performing the collection are described in number 2 above.

A-7. Special Circumstances Involved in Collection of Data.

This data collection effort does not involve any special circumstances.

A-8. Preclearance Notices and Responses.

A pre-clearance notice about this emergency request will be published for a two week public comment period in the Federal Register.

A-9. Payments to Respondents.

There is no payment to respondents other than the formula funds provided in the Workforce Investment, Wagner-Peyser, and Recovery Acts.

A-10. Confidentiality.

ETA is responsible for protecting the confidentiality of the performance data and will maintain the data in accordance with all applicable Federal laws, with particular emphasis upon compliance with the provisions of the Privacy and Freedom of Information Acts. The aggregate information collected through this request will not contain any individually identifying information. For WIA individual records (WIASRD), states will continue to submit records on individuals, but they will submit them with a unique individual identifier, which must not be the individual's social security number.

A-11. Questions of a Sensitive Nature.

The data collection includes no questions of a sensitive nature.

A-12. Respondents' Burden and Cost of Collecting Information.

The reporting requirements related to this change request strive to keep the additional reporting burden to a minimum, while ensuring that ETA collects the

necessary information to report timely information to stakeholders about the use of the Recovery Act funds.

(1) WIA Adult and Dislocated Worker Programs and National Emergency Grants, Form ETA-9148 The additional burden on states for providing monthly reports on data that they currently collect for the WIA Adult and Dislocated Worker Programs and National Emergency Grants is estimated to be **26** hours per month per state, which equates to **312** hours per year per state.

To estimate response burden for the monthly reporting of aggregate participant counts, the WIA Quarterly Report (ETA-9090) was used as a proxy. The WIA Quarterly Report has 44 items for which states provide data for the current quarter and cumulative 4-quarter reporting period. Twenty-one of these items are complex, as they require complex calculations or matching records to wage records (i.e., outcomes). This analysis assigns a weight of one to the basic items, and a user defined weight of 1.8 for these complex items.

The OMB approved burden hours for the WIA Quarterly Report is 160 hours per quarter per state.

Data Elements:

Number of basic items	23
Number of complex items	21

Estimated Burden Hours per Item:

Weight of basic item	1	
Hours needed for basic item		2.64
Weight of complex item	1.8	
Hours needed for complex item	4.752	

Calculated Burden Hours:

Total hours needed for basic items	60.72
Total hours needed for complex items	99.792
Total burden hours	160

The proposed monthly reporting form for the Recovery Act for these programs contains 39 items. None of these items is complex, since outcome data/calculations are not required. The following items provide an estimated burden for this new reporting form based on the WIA Quarterly Report calculations above.

Burden Hours per State:

Number of basic items	39	
Hours needed for basic item		2.64
Calculated burden hours (monthly)		103
Total burden hours (monthly)	26*	
Total burden hours (annualized)	312	

* = the calculated monthly burden hours (i.e., 103 hours) includes the collection of the data elements. The collection of the data elements for this monthly report is already accounted for in OMB Control No. 1205-0420. Thus, the additional monthly burden (i.e., 26 hours) for state grantees to report on data that is already being collected is estimated to be .25 of the total calculated burden.

(2) Youth Summer Employment, Form 9149

The additional burden on states for providing monthly reports on Youth Summer Employment is estimated to be estimated to be **29** hours per month per state, which equates to **348** hours per year per state.

Using the same technique based on the WIA Quarterly Report approved burden hours of 160 per quarter per state, the hours need to complete each basic item is 2.64 and each complex item is 4.752 (see above).

The proposed monthly reporting form for the WIA Youth stimulus funds has 31 items. Two of these items are considered complex because they are leading indicators that require a calculation.

Burden Hours per State:

Number of basic items	30	
Hours needed for basic item		2.64
Total hours needed for basic items		79.20
Number of complex items	2	

Hours needed for complex item	4.752
Total hours needed for complex items	9.504
Calculated burden hours (monthly)	89
Total burden hours (monthly)	29*
Total burden hours (annualized)	348

* = the calculated monthly burden hours (i.e., 89 hours) includes the collection of the data elements. With the exception of the four data elements listed on page one of this justification, the collection of the data elements for this monthly report is already accounted for in OMB Control No. 1205-0420. Thus, the additional monthly burden (i.e., 29 hours) for state grantees to report on data that is already being collected plus the four data elements is estimated to be .33 of the total calculated burden.

(3) Wagner-Peyser Act, including the Reemployment Services Grants, Form 9147

The additional burden on states for providing monthly reports on data they currently collect and for tracking services provided virtually for the Wagner-Peyser Act, including the Reemployment Services Grants is estimated to be **9** hours per month per state, which equates to **108** hours per year per state.

To estimate response burden for the monthly reporting of aggregate participant counts, the Wagner-Peyser and Veteran Employment and Training Service Quarterly Reports (ETA-9002A-E and VETS-200A-C) were used as a proxy. The Wagner-Peyser and Veteran Employment and Training Service Quarterly Reports have 1,855 items for which states provide data. Four hundred eighty one of these items are complex, as they require complex calculations or matching records to wage records (i.e., outcomes). This analysis assigns a weight of one to the basic items, and a user defined weight of 1.8 for these complex items.

The OMB approved burden hours for the Wagner-Peyser and Veteran Employment and Training Service Quarterly Reports is 2,443 hours per quarter per state.

Data Elements:

Number of basic items	1,374
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Number of complex items	481
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Estimated Burden Hours per Item:

Weight of basic item	1	
Hours needed for basic item		1.09
Weight of complex item	1.8	
Hours needed for complex item	1.96	

Calculated Burden Hours:

Total hours needed for basic items	1,497.66
Total hours needed for complex items	943.72
Total burden hours	2,443

The proposed monthly reporting form for the Wagner-Peyser Act, including the Reemployment Services Grants contains 25 items (17 for staff assisted services and 8 for self services). None of these items is complex, since outcome data/calculations are not required. The following items provide an estimated burden for this new reporting form based on the Wagner-Peyser and Veteran Employment and Training Service Quarterly Reports calculations above.

Burden Hours per State:

Number of basic items	25	
Hours needed for basic item		1.09
Calculated burden hours (monthly)		27
Total burden hours (monthly)	9*	
Total burden hours (annualized)	108	

* = the calculated monthly burden hours (i.e., 27 hours) includes the collection of the data elements. With the exception of the two data elements listed on page one of this justification, the collection data for this monthly report is already accounted for in OMB Control No. 1205-0240. Thus, the additional monthly burden (i.e., 9 hours) for state grantees to report on data that is already being collected plus the two data elements is estimated to be .33 of the total calculated burden.

(4) WIASRD Participant/Exiter Files on a Quarterly Basis

The additional burden on states for providing WIASRD files on a quarterly basis on both participants and exiters using the currently approved individual record layout is estimated to be **2,653** hours per quarter per state, which equates to **10,614** hours per year per state.

The WIASRD burden considers the amount of information collected and reported on the WIASRD that would not have to be collected by the states as part of their customary and usual burden to run the program. Thus, the burden reflects the information collected solely to comply with the WIASRD federal reporting requirements. The WIASRD estimate also does not include the burden associated with collecting and reporting information required to meet EEO requirements, which is covered under a separate burden estimate.

The WIASRD burden varies by participant based on the intensity of services provided and the number of WIASRD elements applicable to the participant. For example, considerably more information is reported on WIA youth than WIA adults and collecting the youth literacy, numeracy, and skill attainment elements is more burdensome than collecting other types of data elements. On the other hand, web-based registrations and the use of wage records for measuring outcomes help to minimize the burden of data collection.

The WIASRD data collection burden calculation uses a minutes per record estimate. The minutes per record estimate is derived from the count of WIASRD data elements that are required for the record type, as well as the relative burden of collecting that data. For example, as mentioned above, it is relatively time consuming to collect each WIA youth literacy, numeracy, and skill attainment element, and there are significantly more data elements that must be collected for WIA youth than for WIA adults. Therefore, youth records have relatively higher minutes per record estimates.

The currently approved WIASRD data collection (OMB Control Number 1205-0420) estimate is 604,982 hours, based on PY 2002 exiter counts (599,621—435,355 Adult, Dislocated Worker, and National Emergency Grant and 164,266 Youth). The burden estimate calculation below reflects an increasing number of program participants and quarterly reporting.

Record Type	PY 2007 Annual National	Minutes Per	National Burden
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	Counts (Participants and Exitters)	Record¹	Hours
Adult, DW, NEG	3,229,636	17.7	952,743
Youth	249,060	54.3	225,399
Total Burden	3,478,696		1,178,142
Additional Burden ²	1,178,142 - 604,982		573,160

¹ = The estimate of the minutes per record is based on the OMB control number 1205-0469 (Workforce Investment Streamlined Performance Reporting).

² = The currently approved annual WIASRD data collection (OMB Control Number 1205-0420) is 709,145 hours. These hours are included in the 1,178,142 hours calculated above, thus the total increase in burden due to this request modify the reporting of WIASRD data to include additional participant records and to change the frequency from annual to quarterly reporting is estimated to be **573,160** hours.

The additional burden estimates equates to an average of **10,614** hours per year per state (573,160 hours divided by 54 states and territories).

A-13. Annual Cost to Respondents.

There are no annualized costs to respondents.

A-14. Annualized Federal Cost.

At this time, ETA cannot determine any unique costs other than what is currently accounted for in existing systems. If ETA is able to determine unique costs for this information collection, it will be reporting in future PRA submissions to OMB.

A-15. Reasons for Change in Burden.

The Recovery Act funds are to supplement the existing regularly-funded WIA and Wagner-Peyser Act program resources. Therefore, for reporting purposes, participants in all programs except WIA Youth, Reemployment Services, and National Emergency Grants (grantees will be notified in the grant award letter if the National Emergency Grant was funded with Recovery Act resources), will be considered as participants in the regular formula programs and must be included in all current performance reporting requirements for the respective programs. Special requirements for the WIA Youth, Reemployment Services, and National

Emergency Grants are set forth below.

Current Reports

- ***WIA Title 1B programs and National Emergency Grants***

For WIA programs, including Adult, Dislocated Worker, and Youth programs, and National Emergency Grants, states will continue to submit quarterly and annual reports as required, and include participants whose services are financed with regular WIA formula funds *and* Recovery Act funds (see section below on Supplemental Monthly Reports, WIA Youth, for the exception on Recovery Act-funded youth services).

A) States currently submit a Quarterly Report (ETA 9090—OMB Control No. 1205-0420) (submitted 45 days after the end of the calendar quarter) with the following information:

- Aggregate participant counts by program (WIA Adults, Dislocated Workers, Youth, and National Emergency Grants);
- Aggregate training counts (for WIA Adults and Dislocated Workers only); and
- Aggregate counts of outcomes against performance measures (reports on exiters and depending on measure, reports on individuals who exited anywhere from 15 to 22 months prior to the reporting date).

B) States also submit a WIA Annual Report (ETA 9091—OMB Control No. 1205-0420) on their performance outcomes (National Emergency Grants participants are not included in this report).

C) States will also submit an individual record (WIA Standardized Record Data (WIASRD) (OMB Control No. 1205-0420) on program exiters that includes individual characteristics/demographics, services received, and outcomes achieved.

- ***Wagner-Peyser Act programs (Employment Service (ES) Grants and Reemployment Services Grants)***

States report quarterly aggregate reports (ETA 9002 and VETS 200 series—OMB Control No. 1205-0240) from the Labor Exchange Reporting System 45 days after the end of the calendar quarter on participant characteristics, services and exiter outcomes. No individual participant information is

reported to ETA.

Supplemental Monthly Reports

Consistent with the principles of transparency and accountability, ETA recognized the need to collect participant and performance information more frequently than quarterly to inform policymakers and the public about the progress of the Recovery Act's implementation and, coupled with regular formula funds, about the labor market outcomes it leverages for job seekers.

Information reported quarterly for WIA programs does not provide any detail on the services accessed by participants, and the information is submitted beyond the Recovery Act's statutory time requirement to make information available on www.recovery.gov 10 days after the end of the calendar quarter. Similarly, the Wagner-Peyser Act reports are submitted 45 days after the end of the calendar quarter, and by relying on the quarterly reports alone, information about progress would be lagged and would not meet the Recovery Act's statutory time requirement.

To record the impact of the Recovery Act resources, more current information on participants and the services received is essential. Therefore, to obtain a more robust look at participants and services provided with the additional Recovery Act resources, ETA has developed new, required supplemental reports. Under these new supplemental reports, states are required to submit information that states already collect; however, the supplemental reports are required to be submitted monthly.

No new data element collection is proposed for the WIA Adult and Dislocated Worker programs and National Emergency Grants. This will keep the reporting burden on states to a minimum. The data elements contained in the supplemental monthly report are part of the current data collection requirements for the WIA individual record (WIASRD). This information has been reported to ETA on an annual basis on exiters once the individual has exited the program or the One-Stop system. States will now submit an aggregate extract of that information to ETA on participants, on a monthly basis.

Required monthly supplemental reports will contain the following information:

- **For WIA Adults**, states will report aggregate counts of all participants, including those whose services are funded with regular WIA Adult formula funds and Recovery Act funds. States will report aggregate counts on those participants who are low-income, those receiving Temporary Assistance to Needy Families and other public assistance, the number of UI claimants, Veterans, and individuals with disabilities, numbers in training and type of training, and numbers receiving supportive services. This participant information reflects the Congressional intent of the resources as specified in the Recovery Act to serve low-income individuals and provide training services and the support necessary to stay in training.
- **For WIA Dislocated Workers**, states will report aggregate counts of all participants, including those whose services are funded with regular WIA Dislocated Worker formula funds and Recovery Act funds. States will report the number of UI claimants, Veterans, and individuals with disabilities, numbers in training and type of training, and numbers receiving supportive services.
- **For National Emergency Grants** funded with Recovery Act resources only, states will report aggregate counts of participants, including the number of UI claimants, Veterans, and individuals with disabilities, numbers in training and type of training, and numbers receiving supportive services.
- **For WIA Youth**, reporting will be slightly different. States will report aggregate counts of all Recovery Act youth participants, including the characteristics of participants, the numbers of participants in summer employment, services received, attainment of a work readiness skill, which is required in the Recovery Act, and completion of summer youth employment.

Three factors in the Recovery Act make it necessary to create a separate reporting mechanism for the youth portion of the Recovery Act funding:

1. An emphasis on using funds for summer employment (currently not collected in the WIA quarterly or annual report and only collected as an activity and for exiters in the WIASRD);
2. A change in eligibility increasing the age limit to 24; and

3. The application of the work readiness performance indicator as the only measure used to assess the effectiveness of Recovery-Act funded summer employment.

States are to report on Recovery Act youth who participate in summer employment only by using the new aggregate report only. Such youth would not be included in the WIASRD or any of the other current WIA reporting requirements. Youth served with Recovery Act funds who participate in services beyond summer employment would be included in both the Recovery Act report and in the current WIA reporting requirements.

- **For the Wagner-Peyser Act Employment Service**, states will report on the number of participants served, number of Unemployment Insurance (UI) claimants served, and the type of services received. States will be required to submit supplemental reports of aggregate counts of all participants whose services are financed with regular Wagner-Peyser Act formula funds *and* Recovery Act funds (i.e., Employment Service and Reemployment Services).
- **For the Wagner-Peyser Reemployment Services Grants**, states will report on the same data elements that are collected for the Wagner-Peyser Act Employment Service report, with one additional data element: *referral to training, including WIA-funded training*. A similar data element is used in the ETA Form 9048 (OMB Control No. 1205-0353) for Worker Profiling and Reemployment Services; however, it is not included in the ETA 9002 report. Since Reemployment Services Grants do not provide for training, this new data element will be crucial to see how often the system refers individuals to those programs that offer training interventions.

Change in Reporting Requirements for the WIASRD

To obtain more robust, “real time” information on individual characteristics and services and to determine the effect of the Recovery Act resources, states will be required to submit the WIA individual records (WIASRD) on all participants in the WIA title 1B programs, and in National Emergency Grants, on a quarterly basis, beginning with the 3rd quarter of Program Year 2009, which ends on March 31, 2010. The first deadline for the required quarterly submission will be May 15, 2010. This start date gives states sufficient time to adjust their management information systems.

Such an approach aligns with ETA's proposal to implement a more streamlined and integrated performance reporting system. This participant and performance reporting strategy will provide greater information on levels of program participation, and provide more information about the characteristics of the participants served, and the types of services provided. Through this proposed strategy, more detailed information on individuals will be available while they are participating in the programs than is currently available through the existing quarterly reports.

There is significant value added by obtaining quarterly individual records from state workforce agencies. First, quarterly submissions would provide more timely participant information to respond to the oversight needs of Governors, state and local boards, Congress, Federal stakeholders, and the general public. Current requirements that the WIASRD be submitted annually restrict ETA's ability to do timely analysis and program assessment. With the change in reporting requirements, ETA will benefit from more timely analysis, and states will also receive a return on their investment by having access to more regular updates on nationwide participation information as well as employment and training trends. Quarterly individual data will provide a much clearer picture of how the system is responding to changing state and local economic and labor market conditions.

No new data elements will be added to the collection.

16. Publication Information.

Accountability guidelines for the Act emphasize data quality, streamlining data collection, and collection of information that demonstrate measurable program outputs. Consistent with the law, ETA will make the reported information publicly available through the Administration's Recovery website.

17. Display of OMB Expiration Date.

The proposed web-based data collection instrument will display the approved OMB control number, expiration date, and burden statement.

18. Exceptions to the Certification Statement.

There are no exceptions to the certification statement.

B. Use of Statistical Methods

This collection does not employ statistical methods.