

**YouthBuild, OMB 1205-0464: SUPPORTING STATEMENT FOR REQUEST FOR OMB
APPROVAL
UNDER THE PAPERWORK REDUCTION ACT OF 1995**

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A. JUSTIFICATION

This is a justification for the Department of Labor, Employment and Training Administration's (ETA) request for the Office of Management and Budget's extension of its approval for reporting and recordkeeping requirements of the YouthBuild (YB) program. This standardized data collection for program participants – quarterly reports and Management Information System (MIS) quarterly reporting – is completed by YouthBuild grantees. The housing site form, ETA-9143, is completed as part of each grant application.

The quarterly progress reports (ETA 9136) provide a detailed, narrative account of program activities, accomplishments, and progress toward performance outcomes during the quarter. The quarterly performance reports (ETA 9138) include aggregate and participant-level information on demographic characteristics, types of services received, placements, outcomes, and follow-up status. Specifically, these reports collect data on individuals who receive education, occupational skill training, leadership development services, and other services essential to preparing at-risk youth for high-wage, high-demand occupations through YouthBuild programs.

The accuracy, reliability, and comparability of program reports submitted by grantees using federal funds are fundamental elements of good public administration and are necessary tools for maintaining and demonstrating system integrity. The use of a standard set of data elements, definitions, and specifications at all levels of the workforce system helps improve the quality of performance information that is received by ETA.

A.1 Circumstances Necessitating Data Collection

On September 22, 2006, President Bush signed into law the YouthBuild Transfer Act (Pub. L. 109-281) which transfers the YouthBuild program from the Department of Housing and Urban Development (HUD) to the Department of Labor (DOL). The Employment and Training Administration (ETA) began administration of the YouthBuild program beginning in FY 2007. The YouthBuild program is designed to: enable disadvantaged youth to obtain the education and employment skills necessary to achieve economic self-sufficiency in occupations in high-demand and post-secondary education and 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.

The YouthBuild Transfer Act also emphasizes post-secondary transitions for participants and stronger linkages with the One-Stop Career Center System, community colleges, and apprenticeship programs.

YouthBuild assists youth who are often significantly behind in basic skills in obtaining a high school diploma or GED credential. In YouthBuild, unemployed and undereducated young people ages 16-24 work toward their GED or high school diploma while learning job skills by

building affordable housing for homeless and low-income people. The primary target populations for YouthBuild are adjudicated youth, youth aging out of foster care, out-of-school youth, and other at-risk populations. The reporting and recordkeeping system incorporates each of these aspects necessary for program evaluation.

Three outcome measures determine success in the YouthBuild grants: placement in employment or education, attainment of a degree or certificate, and literacy and numeracy gains. These are the youth common performance measures implemented across federal job training programs as of July 1, 2005. By standardizing the reporting and performance requirements of different programs, the common measures give ETA the ability to compare across programs the core goals of the workforce system—how many people entered jobs; how many stay employed; and how many successfully completed an educational program. In addition to the three outcome measures, grantees report on a number of leading indicators that serve as predictors of success. These include participation in education or training, attainment of degrees and certificates, workforce preparation, mentoring, community service, post-secondary exploration and preparation, and leadership development.

In applying for the YouthBuild grants, grantees agree to submit participant data and aggregate reports on enrollee characteristics, services provided, placements, outcomes, and follow-up status. Grantees collect and report quarterly YouthBuild performance data using an ETA-provided MIS. The MIS is a web-based case management and reporting application housed on ETA's servers.

Pub.L. No. 105-220, Sec 185(d) (The Workforce Investment Act) broadly addresses reports, recordkeeping, and investigations across programs authorized under Title I of the Act. The provisions of section 185:

- require the Secretary to ensure that all elements of the information required for reports be defined and reported uniformly [section 185(d)(2)]
- direct each state, local board, and recipient (other than a sub-recipient, sub-grantee, or contractor of a recipient) to prescribe and maintain comparable management information systems, in accordance with the guidelines that shall be prescribed by the Secretary designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188 [section 185(c)(2)]
- require that recipients of funds under Title I shall maintain such records and submit such reports in such form and containing such information as the Secretary may require regarding the performance of programs and activities carried out under Title I [section 185(a)(2)]
- require that recipients of funds under Title I shall maintain standardized records for all individual participants and provide to the Secretary a sufficient number of such records to provide for an adequate analysis of the records [section 185(a)(3)]
- specify that the reports shall include information about programs and activities carried out under Title I pertaining to:
 - relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants

- programs and activities in which participants are enrolled, and the length of time that participants are engaged in such programs and activities
 - outcomes of the programs and activities for participants, including the occupations of participants and placement for participants in nontraditional employment
 - specified costs of the programs and activities
 - information necessary to prepare reports to comply with section 188 and 29 CFR Part 37.37 [(a-b),(d-e)].
- require that all elements of the information required for the reports described in section 185(d)(1)(A-E) above are defined and uniformly reported.

Pub.L. No. 105-220, Sec 189(d) (The Workforce Investment Act) requires the Secretary to prepare and submit to Congress an annual report regarding the programs and activities carried out under Title I. The report must include:

- a summary of the achievements, failures and problems of the programs and activities in meeting the objectives of Title I
- a summary of major findings from research, evaluations, pilot projects, and experiments conducted under Title I in the fiscal year prior to the submission of the report
- recommendations for modifications in the programs and activities based on analysis of such findings
- such other recommendations for legislative or administrative action as the Secretary determines to be appropriate

A.2 How, by Whom, and For What Purpose the Information is to be Used

Grantees implement recordkeeping and reporting requirements with grant funds. As a government-procured MIS is provided to all grantees, their implementation costs are minimal. Grant funds are also used with the prior approval of the grant officer to upgrade computer hardware and internet access to enable projects to use the MIS.

Grantees enter data into the MIS on individuals who receive services through YouthBuild programs. These data will be used by the Department and ETA to evaluate performance and delivery of YouthBuild program services. The MIS allows grantees to collect additional participant data beyond those elements required by YouthBuild.

ETA uses the data to track total participants, characteristics, services, and outcomes for YouthBuild participants. Common measures enhance ETA's ability to assess the effectiveness of the YouthBuild program within the broader youth workforce investment system.

Within ETA, the data are used by the Offices of Workforce Investment, Financial and Administrative Management, Policy Development and Research, Performance and Technology, and Field Operations (including the regional offices). Other DOL users include the Offices of the Assistant Secretary for ETA and Assistant Secretary for Policy.

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. In addition, information obtained through the MIS information and reporting system will be used at the national level during budget and allocation hearings for DOL compliance with the Government Performance and Results Act (GPRA) and other legislative requirements, and during legislative reauthorization proceedings.

A.3 Use of Technology to Reduce Burden

To comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of participant data and the preparation of quarterly reports to the extent feasible by providing a web-based MIS/Case Management System and by providing uniform data elements and data definitions to grantees across ETA programs. All YouthBuild data and reports are submitted to ETA via the internet. Grantees collect, retain, and report all information electronically through the ETA-provided MIS.

A.4 Efforts to Identify Duplication

A hallmark of WIA Title I is increased accountability in exchange for optimal flexibility. Title I has strengthened accountability by requiring more comprehensive performance standards and establishing quarterly reports for demonstration projects. The data items identified in Attachment A are needed on the individual MIS records to support the measures, and much of these data will be used by grantees to prepare the quarterly progress reports.

ETA has minimized the reporting burden by establishing the number of data elements required commensurate with the level of resources expended and services received. Data items collected by program reports and individual records are needed to: (1) account for the detailed educational, occupational skill training, post-secondary planning and placement, and leadership services and activities provided by YouthBuild program grantees to help at-risk youth participants get and keep well paying jobs; (2) better identify overlapping and unproductive duplication of services; and (3) reduce the effect of stove-piped data and generate performance information across employment and training programs. Information provided through the YouthBuild management information and reporting system is not available through other data collection and report systems.

A.5 Methods to Minimize Burden on Small Businesses

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.

A.6 Consequences of Less-Frequent Data Collection

29 CFR 95.51(b) (59 F.R. 38271, July 27, 1994), which governs monitoring and reporting program performance under grants and agreements with non-profit organizations, states that quarterly reports shall be due 30 days after the reporting period. If ETA did not comply with these requirements, funding for discretionary grant programs would be compromised. In applying for YouthBuild grants, grantees agree to meet ETA's reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY06-08), which requires the submission of quarterly reports within 30 days after the end of the quarter.

A.7 Special Circumstances for Data Collection

These data collection efforts do not involve any special circumstances.

A.8 Federal Register Notice and Consultation Outside the Agency

A 60-Day Notice for Public Comment was published in the *Federal Register* (vol 75, page 56184 *et seq*, September 15, 2010). No comments were received.

A.9 Payment of Gifts to Respondents

There are no payments to respondents other than the grant funds described in the Solicitation for Grant Applications (SGA/DFA PY-04-08).

A.10 Confidentiality Assurances

ETA is responsible for protecting the confidentiality of the YouthBuild 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. The Department ensures the highest level of security whenever personally identifiable information is stored or transmitted. All contractors that have access to individually identifying information are required to provide assurances that they will respect and protect the confidentiality of the data. ETA's Office of Information Services and Technology has been an active participant in the development and approval of data security measures – especially as they apply to the web-based version of the YouthBuild system.

A.11 Additional Justification for Sensitive Questions

While sensitive questions will be asked of participants in the proposed data collection, the confidentiality of participants will be protected as discussed in section A.10. In addition, security is built into the data collection system by the MIS contractor. Participant responses to these sensitive questions will allow ETA to comprehensively evaluate the effectiveness of the YouthBuild program.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the YouthBuild reporting system has three components: (1) the participant data collection burden; (2) the quarterly narrative progress report burden; and (3) the quarterly performance report burden. This response provides a separate burden for each of the three components.

(1). Participant Data Collection Burden, ETA 9138

The YouthBuild **participant data collection burden** considers the amount of participant and performance-related information collected and reported on the participant record that would not have to be collected by the grantees as part of their customary and usual burden to run the program. Thus the burden reflects the information collected solely to comply with the federal reporting requirements.

The data collection burden will vary by participant based on the range and intensity of services provided by the grantee as well as by the number of participants served.

Record Type	Hrs. Per Record	PY 10 Estimated National Count of Participants	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Participant	1.8	6000	10,800	\$14.61	\$157,788

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 Census Bureau's social assistance industry category (May 2010, Current Employment Statistics Survey, U.S. Census Bureau).

(2). Quarterly Progress Reports Burden, ETA 9136

A – Narrative Report: The YouthBuild **quarterly narrative progress report burden** provides a detailed account of all activities undertaken during the quarter including in-depth information on accomplishments, promising approaches, progress toward performance outcomes, upcoming grant activities, and updates on product, curricula, and training development. Each grantee spends approximately two days (16 hours) per quarter preparing this report, according to the experience of the grantees to date.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Narrative Progress Report	64	220	14,080	\$14.61	\$205,709

B - Performance Report The **quarterly performance report burden** assumes that all grantees will use the ETA-provided MIS to generate quarterly performance reports (referred to as MIS Reports in SGA/DFA PY-04-08). The MIS applies edit checks to participant data and generates facsimiles of the aggregate information on enrollee characteristics, services provided, placements, outcomes, and follow-up status in quarterly report format. The burden includes reviewing and correcting errors identified by the MIS in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Performance Report	64	220	14,080	\$14.61	\$205,709

(3). Work Site Description, ETA 9143

As part of the grant application, prospective applicants are required to submit information about the work site that will be used as a training site training YouthBuild participants using the Work Site Description form that consists of Part 1A and Part 1B. Grantees are also required to resubmit these forms prior to the second year of funding (i.e., once during the life of the grant itself) to guarantee that the grantee has access to a suitable property to use in the training of YouthBuild participants. This form includes information on estimated construction costs and sources of funding. The burden is estimated at 30 minutes per submission; this burden, annualized over the three year period of this request for extension is 10 minutes per year.

Report	Annualized Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Housing Site Description	10 minutes	220	23	\$14.61	\$321

TOTAL annual hours for 220 grantees: 10,800 + 14,080 + 14,080 + 23 = 38,983

A.13 Estimated Cost to Respondents

- a) **Start-up/capital costs:** There are no start-up costs, as ETA provides grantees with a free, web-based, data collection and reporting system that grantees use to collect and maintain participant data, apply edit checks to the data, and generate the quarterly reports.
- b) **Annual costs:** There are no annual costs, as ETA covers the annual maintenance costs for the free, web-based, data collection and reporting system.

A.14 Estimates of Annualized Costs to Federal Government

The annual costs of maintaining the system and developing training and technical assistance guides, estimated to be \$285,000, are borne by ETA.

A.15 Changes in Burden

.The increase in burden is due to the growing number of grantees in this program, from 85 three years ago to 220, and the doubling of participants, from the estimated 3,000 in the previous submission to 6,000 in 2010. Finally, the previous submission did not include the housing site description, one from each of the 220 grantees, which accounts for another 23 hours annually, for a total of 38,983 hours.

A.16 Tabulation of Publication Plans and Time Schedules for the Project

Grantees submit narrative progress and MIS performance reports on a quarterly basis to ETA within 30 days of the end of each quarter. Quarterly report data are analyzed by ETA staff and used to evaluate performance outcomes and program effectiveness.

Each year, ETA issues an annual report summarizing program performance based on the Secretary's goals. Data contained in the YouthBuild reports may be included in these reports. The data will also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports. All reports are available on the internet and accessible to the public.

Product	Submission Date	Comments
Quarterly Narrative Progress Report	Within 30 days after the end of the quarter.	Quarterly progress reports and MIS data will be submitted electronically using ETA's On-Line Electronic Reporting System.
Quarterly Performance Report	Within 30 days after the end of the quarter.	

A.17 Approval Not to Display OMB Expiration Date

ETA is not seeking approval to conceal the OMB Expiration Date.

A.18 Exceptions to OMB Form 83-I

No exceptions are requested in the "Certification of Paperwork Reduction Act Submissions."

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not contain statistical methods.