

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT OF 1995; TAACCCT, OMB 1205-0489**

A. JUSTIFICATION

This consolidates reporting requirements for future rounds of grantees of the Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant program with the current, approved Round One grantees' reporting requirements. The TAACCCT enabling legislation calls for three additional rounds of grants, with the final fourth round of grantees grants expected to be awarded in the fall of 2014.

ETA requires grantees to submit Quarterly Progress Reports with a narrative summary of at least two progress measures and at least two implementation measures identified by the grantee in their project work plan. Every fourth quarter, grantees submit an Annual Performance Report with standardized outcome measures that will include aggregate data for program participants and a comparison cohort of participants for the following seven outcome measures: entered employment rate, employment retention rate, average earnings, attainment of credits toward degree(s), attainment of certificate(s) (less than one year), attainment of certificate(s) (more than one year), and graduation rate for degree programs. Unlike Round One grantees, Round Two grantees will not be required to collect and report information on comparison cohort students or on progress and implementation measures.

These reports help ETA gauge the effects of the TAACCCT grants, identify grantees that could serve as useful models, and target technical assistance appropriately. Attachment A contains the reporting instructions for Round One and Round Two grantees.

A.1 Reasons for Data Collection.

ETA's statutory authority to administer this program, issue guidelines including performance reporting by grantees, and assess the impact of each award on workers served by grantees comes from section 1872 of the Trade and Globalization Adjustment Assistance Act of 2009 (Division B, Title I, Subtitle I of the American Recovery and Reinvestment Act of 2009, Public Law 111-5) (19 U.S.C 2372a), as amended by the Health Care and Education Reconciliation Act of 2010, Public Law 111-152.

Specifically, 19 U.S.C. 2372 – 2372a requires that the Secretary prepare and submit to Congress an annual report regarding the programs and activities carried out under the TAACCCT grant program, providing:

- A description of each grant awarded during the preceding fiscal year

- An assessment of the impact of each award in a fiscal year preceding the fiscal year referred to in paragraph (1) on workers receiving training under the TAA for Workers Program

The data collection is designed to help ETA and grantees assess progress made against the grant statements of work, or grant plans, as submitted to ETA during consideration for funding. The descriptions of progress against grantee-defined progress and implementation measures (Round 1) and capacity-building, activities, and deliverables in the quarterly narrative progress report allows grantees flexibility to show success or challenges against their own unique programs. In addition, ETA requires standard quantitative data collection in order to help monitor participants served and outcomes achieved across grants in a similar way. In fact, ETA requires grantees to collect and report on the common performance measures that are applied across other programs administered by ETA. The common measures help to describe the core purposes of related investments: How many people found jobs? Did people stay employed? What were the average earnings?

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

ETA uses the information that grantees report for the following purposes:

1. To provide program and performance information to stakeholders, including participants, employers, taxpayers, Congress, and others;
2. To inform continuous improvement of the quality, effectiveness, and efficiency of the programs;
3. To provide management information for use in Federal program administration and oversight, including grant-specific participation and outcome summaries; and,
4. To fulfill ETA's compliance with the Government Performance and Results Act (GPRA) and to complete the OMB Performance Assessment Rating Tool (PART) review as required.

In addition, information obtained through this reporting will be used at the national level during budget and allocation hearings, for DOL compliance with legislative requirements, and during legislative reauthorization proceedings.

Failure to collect this information will mean that there is no data available to show the outcomes of the Federal investment in this program. It would also mean that ETA is not able to provide oversight and monitoring of this Federal investment.

A.3 Technology and Obstacles Affecting Reporting Burden.

To comply with the Government Paperwork Elimination Act, collection of aggregate data and the preparation of quarterly reports is consistent with report formats and data definitions to grantees across ETA programs. All the TAACCCT reports are submitted to ETA via the Internet. It is left to grantees to select the technology to collect aggregate data according to their unique circumstances and resource availability.

A.4 Efforts to Identify Duplication.

TAACCCT grantees submit quarterly financial reports. These reports are the only reports currently required for TAACCCT grantees to report on program performance. Other ETA reports may track some TAACCCT participants if they participate in other ETA-funded programs.

A.5 Methods to Minimize Burden on Small Businesses.

Some small businesses may be contacted by grantees to obtain information on participants' outcomes, such as post-program employment and earnings information. Grantees can reduce a portion of this burden by collecting information directly from participants or via administrative wage records.

A.6 Consequences of Less-Frequent Data Collection.

The data are needed both for program monitoring efforts to assist grantees and for ETA to provide information to the public on this program. If grantees do not report quarterly, ETA will be unable to discern problems and identify grantees needing technical assistance. Ultimately, the quality of these programs could be compromised to the detriment of participating workers and employers. ETA's responsibility for reporting, oversight, and monitoring would be hampered because there is no other vehicle for judging the progress and performance of TAACCCT grants. The agency would be unable to fulfill its responsibilities under GPRA or to submit required information to OMB for completion of the PART as required.

A.7 Special Circumstances Involved in Collection of Data.

There are no special circumstances for data collection related to the quarterly narrative or aggregate data reported every fourth quarter under the grant agreement. Any adjustments necessary for using supplemental information as the data source will be addressed in separate program guidance.

A.8 Preclearance Notices and Responses.

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to comment on the Federal Register Notice published July 5, 2011 (Vol. 76, p 39128). No comments were received and OMB approved this request for grantee data collection on March 27, 2012.

This current submission makes adjustments to account for the addition of grantees for Round Two, from whom less information will be collected than in Round One.

A.9 Payments to Respondents.

There are no payments to respondents other than the funds provided under the grant agreement.

A.10 Confidentiality.

While this information collection makes no express assurance of confidentiality, ETA is responsible for protecting the privacy of the TACT 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). The Department is working diligently to ensure 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 privacy of the data. The aggregate information collected through this request will not contain any individually identifying information.

A.11 Outcomes of a Sensitive Nature.

While grantees will ask sensitive questions of participants in the proposed data collection for the purpose of collecting demographic and outcome data, ETA will only collect aggregate data summarizing participants and their experiences every fourth quarter as part of the Annual Performance Report. Participant responses to these sensitive questions will allow ETA and the grantees to comprehensively evaluate the effectiveness of the TAACCCT grant program.

A.12 Estimates of the Burden of Data Collection.

The annual national burden for the TAACCCT grants has three components: (1) the burden for collection of data needed on individual participants in order to calculate the Annual Performance Report (APR) , (2) the burden of preparing the narrative for the Quarterly Narrative Progress Report (QNPR), and (3) the burden of preparing the APR.

Changes to the reporting package are requested because new grantees in Round 2 are not required in the Solicitation for Grant Applications (SGA) to collect and report information on comparison cohort students in the Annual Performance Report, or on progress and implementation measures in the Quarterly Progress Narrative Report.

Please note that the changes we are requesting would not be applied to Round 1 grantees who were initially funded in 2011. Round 1 grantees will continue to use the current OMB-approved reporting package in line with their SGA requirements.

The changes described above would *reduce* the burden of reporting for Round 2.

1) Participant Data Collection Burden.

The participant data collection burden considers both the amount of individual participant information collected that is necessary for a grantee to provide aggregate annual data as reflected in the Annual Performance Report (APR), and the amount of information provided by participants. In the charts below, please see the figures for the TAACCCT grant estimates.

Round 1: Data Collection Burden (approved; shown below with actual data instead of estimated data)

TAACCCT Data Collection Burden (Round 1)	Annual National Count of Records	Applicable Estimated Hourly Rate	Estimated Minutes per Record	Annual National Burden Hours	Annual National Burden Dollars (hours*rate)
Grantees	163,348	\$15.41	3.0	8,167	\$125,853
Participants and Comparison Cohort Students	163,348	\$15.41	3.0	8,167	\$125,853
TOTAL	163,348	\$15.41	6.0	16,334	\$251,706

The projections provided by the Round 1 grantees indicate that 81,675 participants will be served by these grantees. Because the grantees are required to match participants with comparison cohort students, this doubles the number of records to be collected to 163,348. We assume that the grantees will spend 0.3 minutes to collect each element, and that participants will spend 0.3 minutes to provide each element for a combined total of 0.6 minutes per data element. Grantees will need to collect 10 data elements per participant to complete the annual performance report. This leads to an estimate of three minutes per record for the grantees and three minutes per record

for the participants. The hourly rates used to calculate cost depend upon the type of organization administering the program. For private nonprofit grantees, we use the estimated hourly rate of the average hourly earnings in the Census Bureau's social assistance industry category (August 2010, Current Employment Statistics Survey, U.S. Census Bureau).

Rounds 2, 3 and 4: Estimated Data Collection Burden
(non-substantive change requested)

TAACCT Data Collection Burden (Round 2)	Estimated Annual National Count of Records	Applicable Estimated Hourly Rate	Estimated Minutes per Record	Annual National Burden Hours	Annual National Burden Dollars (hours*rate)
Grantees	86,676	\$15.41	3.0	4,334	\$66,787
Participants	86,676	\$15.41	3.0	4,334	\$66,787
TOTAL	86,676	\$15.41	6.0	8,668	\$133,574

For Round 2, reduction in the number of records is due to the elimination of the requirement for grantees to collect the comparison cohort student data that was required in Round 1. This cuts the number of records from Round 1 in half (from 163,348 to 81,675). There were 49 grantees in Round 1, and we estimate there will be 52 grantees in Round 2.

The amount of total time spent to collect and to provide each data element remains the same in Round 2 as in Round 1: three minutes per record per participant and three minutes per record per grantee data intake. The hourly rates used to calculate cost also remain the same.

2) Quarterly Progress Report Burden.

The burden to produce the TAACCT narrative for the quarterly progress report includes the time it takes to write, review, and submit the report. For Round 1, each of the four narrative reports produced annually require about 22 hours to prepare, generating an annual burden of 88 hours per grantee. There are 49 grantees in Round One, hence, the total annual burden is 4,312 hours, or \$66,448, as shown in the chart below of approved burden hours.

TAACCT Program	Estimated Hours per Year per Grantee (22 hours x 4 responses)	Annual Number of	Annual National Hours	Applicable Estimated Hourly Rate	Annual National Burden Dollars (hours*rate)
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		Reporting Grantees			
ROUND 1 TOTAL	88	49	4,312	\$15.41	\$66,448

For Round 2, reduction in the number of burden hours is due to the elimination of the section on the status of progress and implementation measures (formerly Section E), which contains six of the twenty sub-sections of the report. Using an average of 51 minutes per sub-section, we calculated a total of 17 hours to complete the report for Round Two.

We estimate there will be 52 grantees in Round 2. The hourly rates used to calculate cost also remain the same. In the chart below, please see the figures for the TAACCCT Round 2 estimates.

TAACCCT Program	Estimated Hours per Year per Grantee (17 hours x 4 responses)	Annual Number of Reporting Grantees	Annual National Hours	Applicable Estimated Hourly Rate	Annual National Burden Dollars (hours*rate)
ROUND 2 TOTAL	68	52	3,536	\$15.41	\$54,490

3) Annual Performance Report Burden.

The TAACCCT annual report burden includes program run times, checking, formatting, and transmitting the annual performance reports to ETA. For Round 1, the annual report produced will require about 48 hours to prepare, generating an annual burden of 48 hours per grantee, as only one report is required per year. There are 49 grantees in Round One, hence, the total annual burden is 2,352 hours, or \$36,244, as shown in the chart below of approved burden hours.

TAACCCT Program	Estimated Hours per Year per Grantee (48 hours x 1 response)	Annual Number of Reporting Grantees	Annual National Hours	Applicable Estimated Hourly Rate	Annual National Burden Dollars (hours*rate)
ROUND 1	48	49	2,352	\$15.41	\$36,244

TOTAL					
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For Round 2, the reduction in burden hours is due to the elimination of Table 2 in the Annual Performance Report. This table is required for Round 1 and is for the reporting of comparison cohort data only, which is not required of Round 2 and future rounds. As per the approved reporting package, Table 1 of the annual report was to be completed once per grantee, and Table 2 was estimated to be completed twice for two different grantee educational programs. Therefore, the number of hours to complete and submit the Annual Performance Report is reduced by two-thirds, from 48 to 16 for Round 2, since no Table 2 data is required.

We estimate there will be 52 grantees in Round 2. The hourly rates used to calculate cost also remain the same. In the chart below, please see the figures for the TAACCCT Round 2 estimates.

TAACCCT Program	Estimated Hours per Year per Grantee (16 hours x 1 response)	Annual Number of Reporting Grantees	Annual National Hours	Applicable Estimated Hourly Rate	Annual National Burden Dollars (hours*rate)
ROUNDS 2, 3 and 4 TOTAL	16	52	832	\$15.41	\$12,812

The total burdens for Round 1 and for Round 2 are shown separately below.

Total Burden for Round 1:

<u>Annual Component Value</u>	<u>Responses</u>	<u>Hours</u>
1) Total Participant Data Collection Burden \$251,706	326,696	16,334
2) Quarterly Progress Report Burden \$66,448	196	4,312
3) Annual Performance Report Burden \$36,244	49	2,352
Total \$354,398	326,941	22,998

Total Burden for Round 2:

<u>Annual Component Value</u>	<u>Responses</u>	<u>Hours</u>
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1) Total Participant Data Collection Burden	173,352	8,668
\$133,574		
2) Quarterly Progress Report Burden	208	3,536
\$54,490		
3) Annual Performance Report Burden	52	832
\$12,812		
Total	173,612	13,036
\$200,876		

A.13 Estimated Cost to Respondents.

Grantees can use grant funds to comply with Federal reporting requirements; as such, costs are considered to be \$0 per grantee.

A.14 Estimates of Annualized Costs to Federal Government.

ETA collects and maintains all quarterly reports through its Office of Information Security and Technology’s on-line Enterprise Business Support System (EBSS). Since the electronic mechanisms for collecting and storing grantee performance data on a quarterly basis are already in place to support other ETA programs, the annualized cost to the Federal government (maintaining the quarterly and annual reports and records through EBSS, matching SIR data with state UI wage records and other Federal employment databases, generating quarterly performance reports and any program close-out activities) for TAACCCT grant reports is minimal.

A.15 Changes in Burden.

Due to both the addition of Round Two grantees to this information collection and the reduced reporting requirements for these grantees, the new totals for both Round One and Round Two grantees for this information collection are 500,55391 responses and 35,826 burden hours.

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

Grantees submit quarterly progress reports through ETA’s online reporting system to ETA within 45 days of the end of each quarter. Annual Performance Reports are submitted through ETA’s online reporting system to ETA within 45 days of the end of the fourth quarter. Quarterly progress and annual performance report data is analyzed by ETA staff and used to evaluate outcomes and program effectiveness.

Each year, ETA issues a report summarizing program performance based on the Secretary’s goals. Data contained in the quarterly and annual reports may be included in these reports. The data is also used to prepare management and budget reports, and other ad hoc reports, which are available on the internet and accessible to the public.

A.17 Display of OMB Expiration Date.

The expiration date for OMB approval will be displayed.

A.18 Exceptions to the Certification Statement.

There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not contain statistical methods.