

SUPPORTING STATEMENT
Enhanced Transitional Jobs Grant Demonstration, Reporting and Recordkeeping
Requirements
OMB NO. 1205-0485

A. JUSTIFICATION

This is a justification for the Department of Labor, Employment and Training Administration's (ETA) request to continue approved reporting and recordkeeping requirements of the Enhanced Transitional Jobs Demonstration (ETJD). This reporting structure features standardized data collection for program participants and quarterly narrative, performance, and Management Information System (MIS) report formats. All data collection and reporting is done by grantee organizations (state or local government or faith-based and community organizations) or their sub-grantees.

The quarterly narrative reports provide a detailed account of program activities, accomplishments, and progress toward performance outcomes during the quarter. Quarterly performance reports include aggregate information on demographic characteristics, types of services received, placements, outcomes, and follow-up status. Specifically, these reports collect data on individuals who receive employment and education services, transitional job support in subsidized placements, supportive wraparound services, placement into unsubsidized employment, and other services essential to assisting non-custodial parents and ex-offenders to achieve successful post-program employment.

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. This demonstration is also the focus of a random assignment evaluation, making access to high-quality performance data all the more important.

A.1. Circumstances Necessitating Data Collection

The Enhanced Transitional Jobs Demonstration is a Workforce Investment Act (WIA) demonstration grant authorized by the Consolidated Appropriations Act of 2010 designed to support applicants in providing "enhanced" transitional jobs programs, as well as other activities and services, to increase the workforce participation of low-income, hard-to-employ populations, specifically non-custodial parents, ex-offenders (who may or may not be non-custodial parents) reentering their communities, or both. In addition to reporting participant information and performance-related outcomes, ETJD grantees must agree to participate in a random assignment evaluation and must demonstrate the establishment of effective partnerships with child support enforcement agencies and/or criminal justice agencies, One-Stop Career Centers, and other partner agencies. The reporting and recordkeeping system incorporates each of these aspects necessary for program evaluation.

Six outcome measures are used to measure success in the ETJD grants: entered employment rate, employment retention rate, average six-month post-program earnings, recidivism rate, and

percent of non-custodial parent participants with child support orders modified. Several of these conform to the 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 or vocational training program. In addition to the five outcome measures, grantees will report on a number of leading indicators that serve as predictors of success. These include placement into unsubsidized jobs, attainment of degrees or certificates, placement into post-secondary education or vocational training, the proportion of participants paying child support orders, and the proportion of participants complying with parole conditions and/or not reoffending.

In applying for the ETJD grants, state and local governments, faith-based and community organizations, and their sub-grantees agree to submit participant data and aggregate reports on participant characteristics, services provided, placements, outcomes, and follow-up status. Grantees will collect and report quarterly ETJD performance data using an ETA-provided MIS. The MIS will be a Web-based case management and reporting application housed on ETA's servers.

As described in WIA Title I, section 172, which addresses evaluation criteria of demonstration projects such as ETJD that are authorized under section 171(a-b), ETJD data will be evaluated by ETA to determine program effectiveness. This evaluation will include the extent to which ETJD improves the employment competencies of participants in comparison to comparably situated individuals who did not participate in the program, and the extent to which ETJD increases the level of employment over that which would have existed in the absence of the program [section 172(a)(1)(A)].

WIA section 172(a) further specifies that the evaluation must address:

- Effectiveness of the performance measures relating to such programs and activities
- Effectiveness of the structure and mechanisms for delivery of services through such programs and activities
- Impact of the programs and activities on the community and participants involved
- Impact of such programs and activities on related programs and activities
- Extent to which such groups and activities meet the needs of various demographic groups
- Such other factors as may be appropriate

WIA section 185 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

A.2. How, by Whom, and For What Purpose the Information Is to Be Used

Grantees will be expected to implement new recordkeeping and reporting requirements with grant funds. As a government-procured MIS is provided to all grantees, their implementation costs are minimized. Grant funds may also be used to upgrade computer hardware and Internet access to enable projects to use MIS.

Grantees enter data into MIS on individuals who receive services through ETJD programs and their partnerships with child support enforcement agencies and/or criminal justice agencies, One-Stop Career Centers, and other partner agencies. These data are used by the Department and ETA to evaluate performance and delivery of ETJD program services. In addition to the required data elements collected, MIS allows grantees to collect additional participant data beyond those elements required by ETJD.

ETA uses the data to track total participants, characteristics, services, and outcomes for released prisoner and non-custodial parent participants. Additionally, ETA analyzes the data to: (1) determine the delivery of core employment services within the WIA framework; (2) study performance outcomes vis-à-vis performance measures, policies, and procedures; and (3) help drive the workforce investment system toward continuous improvement of outcomes and integrated service delivery for participants with multiple barriers to employment. Common measures enhance ETA's ability to assess the effectiveness of the ETJD program within the broader workforce investment system.

Within ETA, the data are used by the Offices of Workforce Investment, Policy Development and Research, Financial and Administrative Management, Information Systems 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 is 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 authorization proceedings.

A.3. Use of Technology to Reduce Burden

To comply with the Government Paperwork Elimination Act, ETA streamlined 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 ETJD data and reports are submitted to ETA via the Internet. Grantees collect, retain, and report all information electronically through 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 strengthened accountability by requiring more comprehensive performance standards and establishing quarterly reports for demonstration projects. Data items identified in Attachment A support the measures and much of these data will be used by grantees to prepare the quarterly progress reports.

ETA 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 services and mentoring provided by multiple agencies to help participants prepare for transitional job placements and eventually, unsubsidized employment; (2) better identify overlapping and unproductive duplication of services; and (3) support the ongoing efforts of the random assignment evaluation in determining the effectiveness of the program model. Information provided through the ETJD 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 sub-grantees 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 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 ETJD grants, grantees agree to meet ETA's reporting requirements as indicated in the Solicitation for Grant Applications (SGA/DFA PY-10-11), which requires the submission of quarterly reports within 45 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

In accordance with the Paperwork Reduction Act of 1995, the public was given an opportunity to review and comment through the 60-day Federal Register Notice, published on May 5, 2014 (see 79 FR 25621). The Department received one substantive comment. The comment is provided below along with the Department's response. The Department has addressed the comment through direct assistance to the grantee and has also clarified in its response that the extension of the data collection approval does not require additional effort or reporting from the grantees but rather, allows grantees that are still reporting to continue to use the system.

Comment:

"As one of the seven Enhanced Transitional Jobs Demonstration (ETJD) sites, RecycleForce is committed to ensuring that we continue collecting program participant information via the web-based MIS system provided for this project by DOL. Our intention is to collect data through the third quarter after exit for all participants. We anticipate concluding all data collection activities early in the fourth quarter of 2014.

Does the no cost extension mean that the MDRC data will be delayed as well? If so, we are very much opposed to this course of action.

RecycleForce entered into this ETJD contract with the understanding the random assignment study would help us understand if our program has statistically significant impacts, or at least some data about what is working and what is not working in our program. At the ETJD conference in June 2013 DOL staff said interim data would be available in December 2013. Yet, no data has been made available to date.

At much insistence, we were provided a document that addresses general early trends with respect to return to jail, but contains no data about that or about earnings, child support, or recidivism (return to prison). Our great worry is that the no cost extension will delay the release of MDRC data depriving us of the evidence basis we strove to establish.

RecycleForce has already spent significant resources that were not in our grant budget to manage issues related to the DOL MIS. This was necessary for two reasons. First, the DOL MIS was

not fully operational until RecycleForce had enrolled virtually every person in ETJD, more than two years after the ETJD project was awarded to us. This resulted in many RecycleForce staff hours of data collection and quarterly reporting outside of the MIS, and then inputting data into the MIS when it finally came fully on line. Second, the MIS system deleted the intake information for dozens of clients during a system upgrade. RecycleForce staff had to retrieve as much of that information as could be found and re-input that information, waiting first for DOL to find the individuals and put them “in process” in the system so that the intake screens could be accessed. As you recall, this had to be done in two separate batches.

We want to use our outcomes to help grow our model to employ those leaving prison with felony records to help them help themselves to experience earning wages to support their families instead of engaging in new crimes. The evidence of our success will help inform policies in Indiana and in other locales and provide much needed data for pay for performance contracts we believe can reduce returns to prison, increase public safety, and increase employment. We have told our elected leaders, local funders, and national foundations that we would have interim data by now – data that is much more robust than the memo we received – and that final data will be available in 2015. We do not want to see the Federal government lose the confidence of state and philanthropic officials in RecycleForce or in wage paying transitional jobs by delaying the data.

It is our understanding that MDRC will not be relying on the self-report information on employment or incarceration tabs in the MIS. At this point in the project, the only thing RecycleForce staff is updating in the MIS is the employment and incarceration tabs. If, in fact, the information is to be collected because it is “necessary to hold ETJD grantees appropriately accountable for the Federal funds they receive,” as stated in the *Federal Register* notice, RecycleForce has done its part. The *Federal Register* notice suggests DOL believes the data collected will help guide the agency. We cannot understand all of the reasons this data may be helpful to DOL, but from our perspective, related to the random assignment study by MDRC, we do not think it is needed given that RecycleForce and perhaps other grantees completed their work on time. We should not be penalized financially through extended requirements due to the delayed performance of others.

To summarize our concern, we do not think the MIS data is necessary for the random assignment study. Even if DOL needs this MIS data for other reasons – like holding agencies accountable for their use of Federal funds – those like RecycleForce that have completed their work and even spent significant money beyond the budgeted amount for DOL’s issues with the MIS should be exempt. In addition, most importantly, we plead that this extension does not delay the release of the data by MDRC at least for those who completed the program on time. We feel we have already lost some credibility with local government officials and potential funders by not being able to deliver data that was promised to us in December. Further delay would only compound this.”

Department Response:

The Information Collection Request (ICR) renewal does not impact the efforts of grantees and does not put any additional burden on this or any other grantee to do further data entry than has been done. Further, this ICR renewal does not relate to the data collection efforts of the Enhanced Transitional Jobs Demonstration evaluation contractor, MDRC, to secure data on control and treatment participants for the purposes of the random assignment evaluation. While

MDRC has used intake information from the Department of Labor's MIS, they are not relying on the Department's data for their evaluation but rather, using it to supplement other data resources.

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-10-11).

A.10. Confidentiality Assurances

Respondents are informed that DOL is strongly committed to maintaining the privacy of their personal information and the security of our computer systems. With respect to the collection, use, and disclosure of personal information, DOL makes every effort to ensure compliance with applicable Federal law, including, but not limited to, the Privacy Act of 1974, the Paperwork Reduction Act of 1995, and the Freedom of Information Act.

ETA is responsible for protecting the privacy of the ETJD 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.

Social Security numbers will not be used in the ETJD system, as an added protection. Instead, the computer system will create a unique participant ID for each case record that will stand in for a Social Security number. The ETJD system also links to a statement that informs the individual where the information he/she has provided is being stored, the name and location of the system, and that the information is protected in accordance with the Privacy Act. Any information that is shared or made public is aggregated by grantee and does not reveal personal information on specific individuals.

A.11. Additional Justification for Sensitive Questions

While sensitive questions related to issues such as housing, family support, drug use, and contact with the criminal justice system will be asked of participants in the proposed data collection, the privacy of participants will be protected as discussed in Section A.10. In addition, security will be built into the data collection system by the MIS contractor. Participant responses to these sensitive questions will allow ETA and the evaluation contractors comprehensively to evaluate the effectiveness of the ETJD program.

A.12. Estimates of the Burden of Data Collection

The annual national burden for the ETJD 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

ETJD participant data collection burden considers the amount of participant and performance-related information collected and reported on the participant case 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 Federal reporting requirements.

The data collection burden varies by participant based on the range and intensity of services provided by the grantee and its partners. For example, data collection may involve acquiring information from the various partner agencies regarding employment training and placement, education assistance, mentoring, transitional job oversight, and child support assistance, in addition to the collection of personal and demographic information by the grantees themselves.

To arrive at the average annual figure of 2.5 hours per participant record, ETA assessed the time for entries based on scenarios postulating a variety of services possible for a range of anticipated participants. This information, in turn, was based on similar programs of this sort, including Justice Department programs. This figure is split between the data entry staff person (2.25 hours) and the participant orally providing data (0.25 hours).

Finally, ETA program managers consulted with grantees who have collected this sort of information over the past several years to verify that 2.5 hours, as an average figure devoted for MIS for the estimated 3,000 participants, averaged out among the seven grants awarded (five to faith based organizations, one to a city government and one to a Workforce Investment Board), represented the best combined response time estimate of time devoted to data entry for each participant, given the range of entries anticipated for each participant, as described above.

MIS data entry; Participant Record Burden	Average Hours per Record	PY11 Estimated National Count	Annual National Burden Hours	Hourly Rate for data entry person	Annual National Burden Dollars
Grantee	2.25	3,000	6,750	\$15.37	\$103,748
Program participant	0.25	3000	750	\$7.25	\$5,438

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 (reported by the U.S. Bureau of Labor Statistics in the Current Employment Statistics Survey for the Social Assistance Industry Category, September 2014 – see: <http://www.bls.gov/web/empsit/ceseeb3a.htm>)

The Federal minimum wage of \$7.25 has been used as an approximation of the value of participant time.

(2) Quarterly Narrative Progress Report Burden

ETJD quarterly narrative progress report 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.

Report	Hours per Year per Grantee	Number of Grantees	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Narrative Progress Report	40 (10 per quarterly report x 4)	7	280	\$15.37	\$4,304

(3) Quarterly Performance Report Burden

ETJD quarterly performance report burden assumes that all grantees will use ETA-provided MIS to generate quarterly performance reports. The MIS is designed to apply edit checks to participant data and to generate facsimiles of the aggregate information on enrollee characteristics, services provided, placements, and outcomes 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	Hours per Year per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
Quarterly Performance Report	80	7	560	\$15.37	\$8,607

Summary

Form/Activity	Total Annual Burden Hours	Total Respondents	Annual National Burden Dollars
Participant Data Collection (Grantee)	6,750	7 grantees	\$103,748
Participant Data Collection (Program Participant)	750	, 3000 participants	\$5,438
Quarterly Narrative Progress Report	280	7 grantees	\$4,304
Quarterly Performance Report	560	7 grantees	\$8,607
Total Unduplicated	8340	7 grantees, 3000 participants	\$122,097

A.13. Estimated Cost to Respondents

- a) **Start-Up/Capital Costs:** There are no start-up costs to respondents.
- b) **Annual Costs:** There are no annual costs, as ETA is responsible for the annual maintenance costs for the free, Web-based data collection and reporting system.

A.14. Estimates of Annualized Costs to Federal Government

The annualized costs to continue to maintain the system and provide technical support to grantees are estimated to be \$100,000 per year. Federal oversight of the project requires about 280 hours annually for a GS13, step 4 employee in Washington, DC earning \$47.40 per hour. See: <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/salhrl.pdf> at 32. Thus, Federal staff costs are \$13,272. $280 \times \$47.40 = \$13,272$.

Total Federal costs are estimated to be \$113,272. $\$100,000 + \$13,272$.

A.15. Changes in Burden

There are no changes in burden.

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 45 days of the end of each quarter. Quarterly report data is analyzed by ETA staff and used to evaluate performance outcomes and program effectiveness.

Each quarter, ETA issues the Quarterly Workforce System Results. Data contained in the ETJD system 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, as needed.

A.17. Approval Not to Display OMB Expiration Date

The expiration date for the OMB approval is displayed.

A.18. Exceptions

No exceptions are requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not contain statistical methods.