

## SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

### A. Justification

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The collection of information is necessary for the proper oversight of discretionary grant funds administered by the Department of Labor's Veterans' Employment and Training Service (VETS) as required by law and regulation. These discretionary grants fund approximately 164 homeless veterans' reintegration projects to serve roughly 17,000 homeless veterans and incarcerated veterans at-risk of homelessness annually.

The discretionary grant funds are also used to fund approximately 70 Stand Down events annually. Stand Downs are one to three-day events providing supplies and services to homeless veterans, such as food, shelter, clothing, health screenings and U.S. Department of Veterans Affairs (VA) and Social Security benefits counseling. At these events, homeless veterans can also receive referrals to other assistance such as health care, housing solutions, employment, substance use treatment and mental health counseling.

There are two statutory provisions requiring the collection of information:

- The Homeless Veterans' Reintegration Program (HVRP) is authorized under 38 USC 2021. The collection of program data is required under 38 USC 2021(b):

*“REQUIREMENT TO MONITOR EXPENDITURES OF FUNDS.—(1) The Secretary of Labor shall collect such information as that Secretary considers appropriate to monitor and evaluate the distribution and expenditure of funds appropriated to carry out this section. The information shall include data with respect to the results or outcomes of the services provided to each homeless veteran under this section. (2) Information under paragraph (1) shall be furnished in such form and manner as the Secretary of Labor may specify.”*

- The Homeless Women Veterans and Homeless Veterans with Children Reintegration (HWVHVCR) grant program is authorized under 38 USC 2021A. The collection of program data is required under 38 USC 2021A(c).

*“REQUIREMENT TO MONITOR EXPENDITURES OF FUNDS.—(1) The Secretary of Labor shall collect such information as that Secretary considers appropriate to monitor and evaluate the distribution and expenditure of funds appropriated to carry out this section. The information shall include data with respect to the results or outcomes of the*

*services provided to each homeless veteran under this section. (2) Information under paragraph (1) shall be furnished in such form and manner as the Secretary of Labor may specify”.*

Additionally, there are two administrative provisions in Title 29 of the Code of Federal Regulations (CFR) requiring grantees to submit performance reports:

- 29 CFR 97.40 (1). *“Grantees shall submit annual performance reports unless the awarding agency requires quarterly or semi-annual reports. However, performance reports will not be required more frequently than quarterly. Annual reports shall be due 90 days after the grant year, quarterly or semi-annual reports shall be due 30 days after the reporting period. The final performance report will be due 90 days after the expiration or termination of grant support. If a justified request is submitted by a grantee, the Federal agency may extend the due date for any performance report. Additionally, requirements for unnecessary performance reports may be waived by the Federal agency. (2) Performance reports will contain, for each grant, brief information on the following: (i) A comparison of actual accomplishments to the objectives established for the period. Where the output of the project can be quantified, a computation of the cost per unit of output may be required if that information will be useful. (ii) The reasons for slippage if established objectives were not met. (iii) Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs”*
- 29 CFR 95.51 (b). *“DOL shall prescribe the frequency with which performance reports shall be submitted. Except as provided in paragraph (f) of this section, performance reports shall not be required more frequently than quarterly or, less frequently than annually. Annual reports shall be due 90 calendar days after the grant year; quarterly or semi-annual reports shall be due 30 days after the reporting period. DOL may require annual reports before the anniversary dates of multiple-year awards in lieu of these requirements. The final performance reports are due 90 calendar days after the expiration or termination of the award. (c) If inappropriate, a final technical or performance report shall not be required after completion of the project. (d) When required, performance reports shall generally contain, for each award, brief information on each of the following: (1) A comparison of actual accomplishments with the goals and objectives established for the period, the findings of the investigator, or both. Whenever appropriate and the output of programs or projects can be readily quantified, such quantitative data should be related to cost data for computation of unit costs. (2) Reasons why established goals were not met, if appropriate. (3) Other pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.”*

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The Competitive Grants Planned Goals Chart (VETS-700) is submitted by HVRP grant applicants through Grants.gov as part of the application package.

All of the forms identified in this request, including the Competitive Grants Planned Goals Chart (VETS-700), are submitted by entities receiving discretionary funding as a condition of funding, and are submitted via email to the VETS Grant Officer's Technical Representative (GOTR) specified in the terms and conditions of each grant.

- The Competitive Grants Planned Goals Chart (VETS-700) is a Microsoft Excel worksheet tool for grantees to summarize quarterly output and outcomes goals for services provided to participants, performance goals for outcome measures, and quarterly expenditure goals. The actual performance of grantees for each indicator is compared to the indicator's goal on a quarterly basis by VETS staff to assess grant progress. This information is submitted one time by each applicant during the grant application process.
- The Technical Performance Report (TPR) (VETS-701) is a Microsoft Excel tool that was developed by VETS to assist grantees to streamline and manage their reporting process. The forms allow VETS GOTRs to monitor each grant individually, and to help VETS in aggregating and analyzing this data so that we may assess the effectiveness of grant programs and submit reports to Congress. The TPR contains the following worksheets or tabs, in the order in which they appear in the workbook:
  - *Planned Goals Tab (VETS-700)* – is the Competitive Grants Planned Goals Chart form discussed earlier.
  - *TPR Tab (VETS-701)* – summarizes actual participation, expenditures and outcome information and compares actual performance to planned performance for the reporting period; most of this information is automatically populated from the Participants Tab (VETS-701B). The grantee only directly enters basic grant information (such as the grant number and certain dates), Assessments, and Expenditures into this tab.
  - *Demographics Summary Tab (VETS-701A)* – summarizes the demographic information entered on the Participants Tab. The enrollment and placement information on this tab is automatically populated from data the grantee enters on the Participants Tab (VETS-701B) and does not require direct data entry.
  - *Participants Tab (VETS-701B)* – provides 1,000 rows for entering demographic and other information related to the grantee's program participants, the services the grantee provides to each participant, and the employment outcomes for participants who have exited the program.
- The Competitive Grants Technical Performance Narrative report (VETS-702) is a fillable Adobe document for grantees to use to describe actual quarterly performance summarized in the VETS-701 report when compared to the planned goals taken from the VETS-700 report. The information is used by VETS staff to track and assess the quarterly performance of each grant. The grantees provide narrative explanations of significant performance deviations in addition to describing grant activities, successes and planned actions.
- The Stand Down After Action Report (VETS-703) is a fillable Adobe document that summarizes the outreach and supportive services made available and accessed by homeless veterans participating in each grant-funded Stand Down event. The information is used by VETS staff to track and assess the performance of each Stand Down grant, and to help VETS in aggregating and analyzing this data so that we may

assess the effectiveness of grant programs and submit reports to Congress. The VETS-703 report is completed and submitted by each grantee at the conclusion of the Stand Down event.

- The Applicant Synopsis (VETS-704) is a Microsoft Excel document that collects the most important metrics from a grantee's response to a Funding Opportunity Announcement. The Synopsis will allow VETS staff to quickly compile all responses and ensure that the distribution of competitive grantees across the country is commensurate with the populations of homeless veterans.

The VETS-700 and VETS-704 forms are completed by HVRP applicants and submitted as part of the application, which is submitted not more often than once per year.

The VETS-701 and VETS-702 forms are completed quarterly by each grantee operating a homeless veterans' reintegration project. Because each participant a grantee serves will receive at least four quarters of service following exit from the program as long as the grantee has a concurrent active year, any grantee operating a current program who also operated a program in the previous year will submit **two** complete, separate quarterly reports each quarter. Grantees operating a PY 2019 grant from July 1, 2019, through June 30, 2020, who also receive a PY 2020 grant will continue to use the previous version of the VETS-701 to report on the follow-up services they provide to their PY 2019 participants through June 30, 2021. All PY 2020 HVRP grant recipients will use the new version of the VETS-701 starting on July 1, 2020. All grantees will begin using the VETS-702 immediately upon approval by OMB.

The VETS-703 form is completed by each grantee receiving funds to operate a Stand Down event. Stand Down events may occur at any point during the year. Stand Down grant recipients will begin using the VETS-703 immediately upon approval by OMB.

All forms will be made available for download from the VETS website.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The VETS-700, VETS-701, and VETS-704 forms are in spreadsheet file formats, while the VETS-702 and the VETS-703 documents are in fillable Adobe PDF formats. Blank forms are electronically transmitted to the grantee as attachments to Veterans' Program Letters and will be found on the VETS Internet website for download. The VETS-700, VETS-701 and the VETS-702 reports are submitted electronically by each grantee via email to the appropriate VETS GOTR. The VETS-703 report is submitted to VETS electronically via email, or in paper form (if the grantee prefers) and delivered, to the appropriate VETS GOTR. The VETS-704 is made available as part of the HVRP Funding Opportunity Announcement (FOA) and submitted as part of the package in accordance with the FOA instructions.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There are no duplicative forms in this request. The information collected on VETS-700 through VETS-704 forms does not duplicate other data collected through other Department of Labor OMB-approved information collection. A search of the published application forms and Federal reports via [www.reginfo.gov](http://www.reginfo.gov) indicates that these forms and reports do not duplicate any similar information collections currently in use by other Federal departments.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form '83-I), describe any methods used to minimize burden.**

The collection does not impact small businesses or other small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Without these collections, VETS staff cannot conduct the necessary Federal oversight to determine the quality of grant implementation, the success of each grant, and to ensure option year awards and past experience can be objectively reviewed and evaluated. The information is also used to provide annual reports to Congress on the activities and outcomes associated with the grant funding.

The VETS-700, VETS-703, and VETS-704 forms are completed and submitted once per grant. There are no opportunities to conduct these form collections less frequently.

The VETS-701 and VETS-702 forms are completed and submitted to VETS on a quarterly basis. Grantees who are awarded a grant for a second successive year must continue to submit quarterly follow-up reports in addition to their new year's quarterly reports. As a result, about one-third of grantees submit this form four times per year, and about two-thirds of grantees submit it eight times per year. Since grants to fund homeless reintegration projects are awarded on an annual program year basis, reporting less frequently than quarterly would impede the agency's efforts to track and manage the performance of these grants to ensure the highest return on the investments of Federal monies.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

These data collection efforts do not involve any special circumstances.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The Department published a Federal Register Notice on September 19, 2019, notifying the public of its intent to pursue this information collection. No public comments were received.

It is important to note that all organizations operating competitive grants had prior knowledge of the forms highlighted in this Supporting Statement and that the Department annually sought (and continues to seek) from grantee organizations their views on the reporting forms, clarity of instructions, ease of use, utility, frequency, and formats. This feedback is through the “Community of Practice” consultations conducted by the National VETS Technical Assistance Center (NVTAC) grantee under a contract from the Department. NVTAC forwards these comments and suggestions to VETS National Office and/or the appropriate Grant Officer Technical Representative(s) for follow-up discussions. Comments and suggestions from these annual consultations were incorporated into the forms prior to submitting this information collection request.

The NVTAC provides guidance and information about program development, administration, governance and funding to all of the nation’s homeless veteran service providers, including providers funded through DOL-VETS competitive grants. This is achieved through face-to-face meetings, conferences, consultations, publications, and the NVTAC website.

Additionally, the Department consulted with various Veterans Service Organizations (VSOs) to obtain their views on the reporting forms, clarity of instructions, ease of use, utility, frequency, and formats. The VSOs provided feedback on ways to streamline the reports to improve the ease

of use and to limit the data elements to only critical reporting elements. The Department routinely engages VSOs in dialogues on ideas for improving services to veterans.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There are no payments to respondents other than the competitively awarded grant funds.

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

VETS is responsible for keeping confidential the reported information and maintains 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 Privacy Act does not apply to this collection as the reported data do not contain any personally identifying information. While grantees will submit records on individuals, it is important to note that personally identifying information are not included in these submissions. Grantees will assign to each participant a unique individual identifier. The person attached to each individual identifier is only known by the grantee.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a sensitive nature are included in any application or any report form described in this information collection request.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

The numbers of respondents per year listed in Table 1 are based on the actual number and types of HVRP grantees VETS awarded in 2018. We awarded 164 HVRP grants, of which two-thirds also received an award the previous program year. This is significant because those two-thirds must use current-year funding to follow up on the previous year's grant participants and report on their former participants' employment status.

The burden per response for each information collection activity was determined through information captured through informal consultations with a small number of grantees with experience in completing these forms over the past two years. The burden estimates include the time to review the instructions, find the information, and complete each form. The estimated annualized respondent costs in Table 2 represent monetized burden hours. The rate of pay used to monetize the burden hours is the median hourly rate of pay for Training and Development Managers as reported in the May 2018 Occupational Employment Statistics produced by the Department of Labor's Bureau of Labor Statistics.

Table 1  
Estimated Annualized Respondent Hours Burden

Form	Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Average Burden per Response (in hours) <sup>1</sup>	Total Respondent Burden Hours
VETS-700	280	1	280	1	280
VETS-701 (Quarters 1-4)	164	4	656	10	6,560
VETS-701 (Quarters 5-8)	100	4	400	2	800
VETS-702 (Quarters 1-4)	164	4	656	4	2,624
VETS-702 (Quarters 5-8)	100	4	400	1	400
VETS-703	70	1	70	2	140
VETS-704	200	1	200	1	200
Total			2,662		11,004

<sup>1</sup> Average number of hours to complete the form as reported by a small number of grantees to VETS regional office staff in 2019.

Table 2  
Estimated Annualized Respondent Cost Burden

Form	Total Respondent Burden Hours	Hourly Wage Rate <sup>1</sup>	Total Respondent Costs
VETS-700	280	\$53.53	\$14,988
VETS-701 (all)	7,360	\$53.53	\$393,981

VETS-702 (all)	3,024	\$53.53	\$161,875
VETS-703	140	\$53.53	\$7,494
VETS-704	200	\$53.53	\$10,706
Total	11,004		\$589,044

<sup>1</sup> Hourly rate is based on the U.S. Department of Labor, Bureau of Labor Statistics' median hourly wage for Training and Development Managers published May 2018 (<https://www.bls.gov/oes/current/oes113131.htm>).

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

- **The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are zero costs.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

DOL-VETS federal staff perform a number of functions in support of these forms as Grant Officer's Technical Representatives (GOTRs):

- Assist grantees with completing forms.
- After form submittal, review the form to ensure accuracy.

- Read the forms to identify potential technical assistance needs within the program.

Each grant is assigned a GOTR, and each GOTR may spend forty hours per year providing assistance specifically related to completing and reviewing these forms. With approximately 164 active grants each year, VETS GOTRs dedicate an estimated 6,560 hours per year to this purpose.

Additionally, GOTRs spend approximately eight hours per year assisting grantees with reporting on their follow-up activities from the prior active year. With 100 follow-up years concurrent with the active year, this adds up to 800 hours per year that GOTRs spend assisting grantees and reviewing these forms.

To ensure that high-quality data is submitted, these forms undergo a second level of review within VETS. Second-level reviewers spend approximately four hours per year, per grant, whether it is active or follow-up. This adds up to 1,056 hours per year spent on second-level reviews of submitted forms.

VETS uses contracted support staff to analyze aggregated report data from these forms. VETS uses the results of this analysis to determine program successes and areas of improvement on a national level. The annual cost to HVRP for this contract is \$399,040. It should be noted that, without collecting this data through these forms, the cost would be much higher since VETS would need to sift manually through narrative reports to find the data that is efficiently collected through the forms.

There are no additional costs to the Federal government for collecting this information.

Grantees charge their HVRP grants for the time it takes to complete the VETS-701, VETS-702, and VETS-703 forms. Since the VETS-700 and VETS-704 are completed prior to grant award, the grant cannot be charged for that time.

#### **15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.**

The total burden hours for this ICR has increased from 5,540 to 11,004 since the last approval. There are several reasons for this.

The first and main reason for this increase is that the previous ICR did not use grantees' actual reported hours. Since all of the forms were new at that time, the small number of surveyed grantees had no way to know how long it would take to fill out the forms. A more recent survey found that the actual number of hours it took respondents to complete the forms, based on their 2-3 years of experience, was much higher than the original group estimated. For example, the original group estimated that it would take three hours per quarter to complete the VETS-701. In fact, it takes an average of ten hours per active quarter.

Also, VETS now requires eight quarterly reports per grant (if funding continues for a second consecutive year) instead of four, which increased the number of times most grantees must

submit the VETS-701 and VETS-702. This change allows us to track the longer-term impact on HVRP participants and is required by the Workforce Opportunities Investment Act. Since two-thirds of our grantees in any given year also operated a similar grant in the previous program year, the total burden hours would have increased somewhat even if there were no other factors.

Third, the original ICR only accounted for the number of successful applicants who would fill out the VETS-700 form. However, this left out the unsuccessful applicants who were required to submit the form as part of their application package. This ICR includes all respondents, not just the respondents who would later become our grantees.

Finally, we have also added the VETS-704 since the previous ICR, which will help VETS to more quickly determine the appropriate geographical distribution of HVRP grants.

**16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

There are no plans to publish the results separately from those reported to Congress annually as required.

However, it is worthwhile to note the Chief Evaluation Officer (CEO) for the Department initiated a 60-month study in September 2017 to evaluate the effectiveness of Homeless Veterans Reintegration Program (HVRP) on participants' employment outcomes; and to conduct an implementation evaluation to understand program models and variations, partnerships, and the homeless Veterans served. It is possible that aggregated data from VETS-701 forms may be used in the research. The results of the planned evaluation are not expected until September 2022. No details about the evaluation study are available at this time and VETS does not know whether a report of the study's results will ultimately be published.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The expiration date for OMB approval will be displayed. We are not seeking approval to have this concealed.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.**

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