

SUPPORTING STATEMENT
H-1B Technical Skills Training (TST) and Jobs and Innovation Accelerator Challenge
(JIAC) Grants
OMB Control Number 1205-0507

A. Justification

The Department of Labor's (DOL's), Employment and Training Administration (ETA) request for an extension without change to OMB control number 1205-0507, expiration date June 30, 2019, to allow ETA to support the 1) reporting, 2) recordkeeping, and 3) program evaluation requirements for the following H-1B funded grant programs currently reporting under the OMB-approved reporting package: H-1B Technical Skills Training (TST) grant program; Jobs and Innovation Accelerator Challenge (JIAC) grant program; and the Ready to Work (RTW) grant program (previously referred to as TST round 4).

To ensure the continued collection of performance data, ETA requests this extension to continue to allow grantees to submit performance data to 6/30/2022. Collecting of this information is necessary to determine the success of active Ready to Work grants. As all other H-1B grant programs under this ICR have ended, with the exception of the Ready to Work grant program, this request pertains only to reporting and record keeping requirements for Ready to Work grantees and does not impact any other grants or evaluation requirements.

Compared to the previously approved ICR, the proposed extension would decrease the total annual burden hours because only Ready to Work will be active during the extension period. The burden incurred by this extension is likely to be less than the estimate provided in this supporting statement because several grantees are expected to reach the end of their periods of performance during the first year of the extension period.

- 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.*

H-1B TST, JAIC, and RTW grants are authorized under section 414(c) of the American Competitiveness and Workforce Improvement Act of 1998 (ACWIA) as amended (29 U.S.C. § 3224a), which identifies performance accountability requirements for these grants. More specifically, 29 U.S.C. § 3224a(7) states, "The Secretary of Labor shall require grantees to report on the employment outcomes obtained by workers receiving training under this subsection using indicators of performance that are consistent with other indicators used for employment and training programs administered by the Secretary, such as entry into employment, retention in employment, and increases in earnings. The Secretary of Labor may also require grantees to participate in evaluations of projects carried out under this section."

To support these legislative requirements, in applying for the H-1B TST, JAIC, and RTW grant programs, grantees agreed to submit participant-level data quarterly for individuals who receive services through these programs. The reports include aggregate data on demographic characteristics, types of services received, placements, outcomes, and follow-up status. Specifically, grantees summarize data on employment and training services, placement services, and other services essential to successful unsubsidized employment through H-1B programs.

ETA uses data collected to report to Congress and the public on the progress and success of these grants; hold grantees accountable for the Federal funds they receive; support oversight, management, and technical assistance efforts; and support information collection for an ongoing program evaluation where data is necessary to support random assignment for a rigorous impact evaluation to understand the effectiveness of the program strategies. The information collection for program evaluation includes setting up a Participant Tracking System (PTS) through the MIS to collect baseline information similar to the quarterly reports, but at the individual participant level. The reporting and record keeping system, along with the PTS and site visit information incorporates each strategy component necessary for program evaluation.

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.*

In applying for the H-1B grants, grantees and their sub-grantees agree to submit participant-level data and aggregate reports on participant characteristics, services provided, placements, outcomes, and follow-up status. Grantees will collect and report quarterly H-1B performance data using the HUB Reporting System. Grantees will also collect participant Social Security Numbers, which will allow ETA to match wage records for grantees and lessen the burden on grantees to track post-program outcomes for the WIA common performance measures.

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.

If the current OMB-approved package is discontinued upon current expiration (June 30, 2019), ETA will be unable to collect final performance data from Ready To Work grantees. The discontinuance of OMB control number 1205-0507 will also prevent ETA from reporting on the extent to which the Ready To Work grants met their goals for successful implementation of the programs they anticipated developing.

In addition, a disruption in data collection would present challenges to the ongoing Ready To Work program outcomes evaluation, which is being conducted by an independent, external evaluation firm overseen by DOL's Chief Evaluation Office. The evaluation includes an implementation study that will provide lessons on the design, implementation, and operation of these programs, and an outcomes study that will examine participants' educational attainment, employment and earnings. Quarterly performance data submitted by grantees are used in the evaluation. Significant resources have been dedicated to the study. The outcomes study and this investment would be put at risk if the study were unable to continue or lacked the data necessary to analyze program outcomes.

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.*

Reports:

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 1) the Web-based HUB Reporting System 2) uniform data elements and data definitions to grantees across the program. All H-1B data and reports will be submitted to ETA via the HUB Reporting System in alignment with the above objective. Grantees will collect, retain, and report all information electronically through this system and will be provided comprehensive training on when and how to upload all reporting information.

To further reduce grantee burden, ETA will track WIA Adult Common Measures on behalf of the grantee requesting that grantees submit the following information on participants: 1) Social Security Numbers; 2) Employment status at participation; 3) Date of exit; and 4) Reason for exit. It is left to grantees to select the technology to collect aggregate data according to their circumstances and resource availability.

Data Collection for Program Evaluation:

The PTS is a web-based system within the existing MIS for gathering background information on participants, as well as for executing random assignment for the evaluation. The system's drop-down menus and response categories minimize the data entry burden on grantee staff; in addition, the research team will train all grantee staff on how to use the system to randomly assign participants.

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.*

Reports:

The Department holds grantees accountable by requiring them to identify and work toward comprehensive performance standards and by establishing quarterly reports for competitive projects. The data items identified in **Attachment F_H-1B Data Elements for Performance and Evaluation** will be used to generate Quarterly Performance Reports (QPRs).

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 provided by multiple agencies to help participants prepare for job placement; (2) better identify overlapping and unproductive duplication of services; and (3) support the ongoing evaluation efforts in determining the effectiveness of the program model. Information provided through the HUB Reporting System is not available through other data collection and report systems.

Data Collection for Program Evaluation:

Baseline Information Form (BIF) & Participant Tracking System (PTS)

The BIF will collect basic demographic, socioeconomic, and barrier-related characteristics on all consenting persons prior to random assignment. It will also collect the name, address, phone number, and email address of up to three of the participant's close friends or relatives who would likely have knowledge of his or her whereabouts at the time of follow-up data collection.

Baseline and contact data are needed for the following purposes:

- ***To Conduct Random Assignment.*** Some basic identifying information (i.e. name, address, date of birth) is needed to conduct random assignment.
- ***To Monitor Random Assignment.*** Baseline information will be used to ensure that no one goes through the random assignment process more than once. Grantee staff at each selected site will enter identifying information about individuals into the PTS, and the system will alert the staff if the person has already been randomly assigned. Checking for previous randomization ensures that people always remain in the same research group and that the research sample does not include duplicate cases. We will also use baseline data to detect differences in the characteristics of members of the treatment and control groups, since such differences would suggest a problem with the assignment process.
- ***To Locate Participants for Surveys and Collect Administrative Data.*** The BIF will collect detailed identifying information for each participant, including people who may

know the whereabouts of the participant. This information is crucial for locating study participants for the follow-up surveys and thereby increasing the response rates. The participant's SSN is essential for obtaining administrative data, such as Unemployment Insurance quarterly wage records that will be used to measure employment outcomes, since agencies typically provide data by matching on SSN. The SSN is also helpful in locating participants for follow-up surveys, as many of the locating services search for current address and telephone number using the SSN.

- ***To Describe the Sample at Random Assignment.*** Baseline data will allow researchers to describe in more detail the population being served by each program.
- ***To Define Subgroups for the Impact Analyses.*** Baseline data on the characteristics of sample members are essential to define subgroups for which impacts can be estimated. These include characteristics such as sex, race/ethnicity, health status, employment history, barriers to employment, and attitudes toward work.
- ***To Increase the Precision of Impact Estimates.*** By including information on the baseline characteristics of study participants in regression models, the precision of impact estimates can be improved.
- ***To Adjust for Nonresponse Bias.*** With random assignment, simple differences in the mean outcomes between the treatment and control groups provide unbiased estimates of the impacts. However, systematic differences between the characteristics of members of the two groups might occur because of differential rates of survey nonresponse across the groups. To the extent that these characteristics are correlated with the outcome variables, this may lead to biased impact estimates. Baseline characteristics can be used to adjust for potential bias that may arise from survey nonresponse.

The BIF will be completed by everyone who has been found eligible and has given signed consent to participate in the study. As with the consent forms, grantee staff administering the BIF will be available to answer questions. For people with low literacy or other reading barriers, the grantee's staff can provide assistance. The form will be translated into Spanish and other languages as necessary.

The information being recorded in the PTS for the evaluation is not otherwise available in the format required for conducting accurate random assignment—that is, in a manner that: (1) is systematic across sites, (2) maintains integrity of the process, and (3) ensures privacy of information. The research team reviewed the quarterly reports that each grantee submits to ETA and found that they present financial information and minimum participant-level data. The reports fail to provide key identifiers and contact information for future data collection, to document the characteristics of the sample in terms of education and employment history and work-related barriers, or to supply key data needed to create meaningful subgroups.

Site Visits:

The data to be collected during the site visits are not available from any other source. There is no other data source providing detailed information on the program context, program services, control group environment, implementation, challenges, and successes. The first round of site visits will focus on the grant activities as implemented to that point while the second and third rounds of visits will document changes in activities over the course of the grant period and sustainability of the program or services in the future.

5. *If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.*
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.
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.*

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 Ready To Work grantees.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5.*

There are no special circumstances for quarterly data collection under the grant agreement.

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.

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to review the Federal Register Notice on 12/28/2018 (83 FR 67356). No public comments were received.

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 funds provided under the grant agreement.

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

While this information collection makes no express assurance of confidentiality, ETA is responsible for protecting the privacy of Ready To Work participants 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.

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.*

Ready To Work grantees will ask sensitive questions of participants in the proposed data collection for the purpose of collecting demographic and outcome data. Participant responses to these sensitive questions will allow ETA and the grantees to comprehensively evaluate the effectiveness of the Ready To Work Program grant program. See section four for an explanation of participant data that is collected through the Baseline Information Form (BIF) and Participant Tracking System (PTS).

12. *Provide estimates of the hour burden of the collection of information.*

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

ETA calculated the number of estimated the national burden based on the number of RTW grants that are still active during the extension period.

(1) Participant Data Collection Burden

H-1B participant data collection burden considers the amount of participant and performance-related information collected and reported on the participant case record, which grantees would not have to collect 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 and evaluation requirements.

The data collection burden will vary 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, and on-the-job training, in addition to the collection of personal and demographic information and some evaluation data elements collected by the grantees themselves.

To arrive at the average annual figure of 2.66 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 other employment and training programs. This figure is split between the data entry staff person (2.33 hours) and the participant orally providing data (0.33 hours).

Finally, ETA program managers consulted with grantees that have collected this sort of information over the past several years to verify that 2.66 hours is the average amount of time spent per record. This average figure (that includes the data entry into a participant tracking system) for the estimated 7,371 participants per program year, averaged across approximately 24 grantees, represents the best combined response estimate of time devoted to data entry for each participant, given the range of entries anticipated for each participant, as described above.

(2) Quarterly Narrative Report Burden

H-1B quarterly narrative 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.

(3) Quarterly Performance Report Burden

H-1B quarterly performance report burden assumes that all grantees will use the HUB Reporting System to generate quarterly performance reports, as is required by the grant. The HUB Reporting System is designed to apply edit checks to participant files 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 HUB Reporting System in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports. ETA assumes each grantee will spend approximately ten hours per quarter preparing this report.

The following table can be used as a guide to calculate the total burden of an information collection.

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response (hours)	Total Annual Burden (Hours)	Hourly Rate**	Monetized Value of Respondent Time
Participant Data Collection – Grantee	7,371	Continual	7,371	2.33	17,174	\$17.05	\$292,814
Participant Data Collection - Participant	7,371	Continual	7,371	0.33	2,432	\$7.25	\$17,635
Quarterly Narrative Report	24	varies*	96	10	960	\$17.05	\$16,368
Quarterly Performance Report	24	varies*	96	10	960	\$17.05	\$16,368
Site Visit Data Collection	24	1	24	1 hour	24	\$22.62	\$542.88
Unduplicated Totals	14,814	variable	14,958	variable	21,550	variable	\$343,727.54

*For the extended period of this ICR, RTW grantees will complete their periods of performance on different dates from one another. Therefore, the actual cost will be lower than this because some grantees will end their periods of performance earlier than others during the extension period.

**Hourly rates used to calculate hourly cost for H-1B programs depend upon the type of organization administering the program. For their private non-profit grantees, the hourly

rate of \$17.05 is the average hourly earnings in the Bureau of Labor Statistic's Social & Human Assistance Industry category identified in the 2017 Occupational Employment Statistics Survey, Bureau of Labor Statistics
(<http://www.bls.gov/oes/current/oes211093.htm#st>).

The average hourly wage in the table for site visit data collection is \$22.62, based on the BLS average hourly earnings of production and nonsupervisory employees on private, service providing, nonfarm payrolls identified in the 2018, Occupational Employment Statistics Survey, Bureau of Labor Statistics BLS Data Viewer
(<http://beta.bls.gov/dataViewer/view/timeseries/CES0500000008>).

The Federal minimum wage of \$7.25 has been used as an approximation of the value of participant time, identified in the Economic Policy Institute website
(<http://www.epi.org/minimum-wage-tracker>).

13. *Provide an estimate for 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 already reflected on the burden worksheet).*

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 – the HUB Reporting System – which grantees use to collect and maintain participant data, apply edit checks to the data, and generate quarterly performance reports.

b) Annual Costs: There are no annual costs, as ETA will be responsible for the annual maintenance costs for the HUB Reporting System.

14. *Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.*

The annual costs of maintaining the system, estimated to be \$285,000, are borne by ETA. Since HUB, the electronic mechanisms for collecting and storing grantee performance data on a quarterly basis, is already in place, the annualized cost to the Federal government (maintaining the quarterly reports and records through HUB, matching SIR data with state UI wage records and other Federal employment databases, and generating quarterly performance reports and any program close-out activities) reflects maintenance only costs.

15. *Explain the reasons for any program changes or adjustments reported on the burden worksheet.*

The decrease in the total value of respondent time includes (1) a decrease in the number of respondents to account for only TST Round 4 (Ready to Work) being active during this period: 7,371 participants served, in comparison to 25,000 identified in the previous ICR; (2) an increase in the hourly rates compared to hourly rates used at the time the previous ICR was published. Hourly rates were updated to the most recent figures recorded in BLS data.

The actual burden hours incurred may be substantially less than this estimate because many of the RTW grantees will likely close within the first year of the extension period (end-dates for grantees' periods of performance vary from one another because of period of performance extensions). Accordingly, the burden hours given in this supporting statement are a high-end estimate.

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.*

Grantees submit quarterly progress reports through the Online Electronic Reporting System to ETA within 45 days of the end of each quarter. Quarterly 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.

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

The expiration date for the OMB approval will be displayed.

18. *Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."*

No exceptions are requested.

B. Collections of Information Employing Statistical Methods

No statistical methods will be used. All data collection will be based on a 100 percent sample of the inference population. In all reports and other publications and statements resulting from this work, no attempt will be made to draw inferences to any population other than the set that responded to the data collection effort.

ATTACHMENTS

Below is the list of attachments included in this request. There are no changes to the following attachments from the versions previously published.

The H-1B Performance Reporting Handbooks

- **Attachment A:** H-1B TST-JIAC Performance Reporting Handbook
- **Attachment B:** H-1B RTW Performance Reporting Handbook

The H-1B Quarterly Narrative Reports

- **Attachment C:** H-1B TST Quarterly Narrative Report Template
- **Attachment D:** H-1B JIAC Integrated Work Plan Quarterly Narrative Report Template
- **Attachment E:** H-1B RTW Quarterly Narrative Report Template

The H-1B Quarterly Performance Report Forms

- **Attachment F:** H-1B TST JIAC QPR Form
- **Attachment G:** H-1B RTW QPR Form

Evaluation Supporting Documents

- **Attachment H:** H-1B Evaluation Consent Form
- **Attachment I:** H-1B TST Evaluation Process Study Interview Protocol
 - H-1B OMB_Appendix A_Site Selection Telephone Interview Protocol
 - H-1B Process Study Interview Guide
- **Attachment J:** H-1B RTW Evaluation Process Study Interview Protocol

The H-1B Performance and Evaluation Data Collection Elements

- **Attachment L:** H-1B Data Elements for Performance and Evaluation
- **Attachment M:** Baseline Information Form

Federal Register Notice 2018 - 28242

- **Attachment N:** Federal Register Notice 2018-28242 (12/28/2018, Vol. 83, No. 248, Pgs. 67356-67357)