

**SUPPORTING STATEMENT
UNDER THE PAPERWORK REDUCTION ACT OF 1995
REQUESTING APPROVAL TO EXTEND OMB CONTROL NUMBER 1205-0420**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

This is a justification for the Department of Labor (DOL), Employment and Training Administration's (ETA) request for a three year extension to the Workforce Investment Act (WIA) Management Information and Reporting System. This reporting structure will remain in place until grantees have completed all required reporting requirements under WIA. There will be a short period in which the WIA reporting system is still in effect, while the Department of Labor transitions to performance reporting under section 116 of the Workforce Innovation and Opportunity Act (WIOA), which supersedes WIA.

On July 22, 2015, the Department issued an information collection request (ICR) for implementing WIOA performance requirements in accordance with WIOA section 116. Section 136 of WIA will remain in place until the performance requirements under WIOA have been fully implemented. Because we are using WIA performance measures, we are referring to the reports collected under this collection as "WIA Reports." Once the Department has fully implemented WIOA's performance system, and all reporting requirements under WIA are met, these WIA Reports will be discontinued.

Generally, WIOA took effect on July 1, 2015 (See WIOA sec. 506(a.)) However, Sec. 116 of WIOA, which outlines the performance accountability requirements, has not yet taken effect (See WIOA sec. 506(b)(1)). Under the Department's transition authority, in order to provide for an orderly transition from WIA to WIOA, we will require the states to use the WIA performance metrics in WIA sec. 136 to report on WIOA participants for one program year. This means that outcomes for WIOA participants who became WIOA participants after July 1, 2015, will be reported according to the WIA section 136 performance measures.

This WIA reporting structure includes quarterly (ETA 9090) and annual (ETA 9091, comprised of both a data table and narrative portion) reports as well as a standardized individual record file for program participants, called the Workforce Investment Act Standardized Record Data (WIASRD). The WIASRD is submitted by the states to ETA and includes participant level information on customer demographics, type of services received, and outcomes.

The accuracy, reliability, and comparability of program reports submitted by states 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 DOL. The common performance measures are an integral part of ETA's performance accountability system, and ETA will continue to collect from grantees the data on program activities, participants, and outcomes that are necessary for

program management and to convey full and accurate information on the performance of workforce programs to policymakers and stakeholders.

Currently ETA has both report validation and data validation requirements in place for two primary purposes. First, States use the Enterprise Data Reporting and Validation System (E-DRVS) to ensure that annual and quarterly reports are computed correctly and consistently across all States. States use E-DRVS to produce the reports by uploading files containing the individual record data for each participant and exiter served to the E-DRVS web site. E-DRVS then performs multiple valid value and cross-field edit checks to ensure submitted records are consistent with established specification. Once the file is free from duplicate records and reject errors, the file is submitted for report generation. E-DRVS then processes the file to generate the required reports, which are made available for state review and certification in the Enterprise Business Solutions System (EBSS). Second, E-DRVS will annually draw a stratified, weighted sample of individual records that are used for data element validation purpose. The underlying documentation is checked against what is reported in the pertinent individual record data to ensure that the underlying information was accurately reported and that the outcome results that were derived are consistent with that underlying information. For more information on data validation see the data validation reporting information collection request (OMB Control No. 1204-0448).

High quality program performance requires the submission of timely, accurate, and consistent data on the characteristics, services received, and outcomes of program participants. Together, the 9091, 9090, and WIASRD comprise the data collected on participants. As such, these data are necessary for tracking and reporting to stakeholders information on the usage, services provided, and performance of these programs. These data are used to monitor the core purpose of the programs – mainly, tracking how many people found jobs; did people stay employed; and what were their earnings.

The three-year extension will cover the time period necessary to complete all required WIA reporting. The changes proposed to the collection consist of: 1) updating the authority section; and 2) updating the data collection burden estimates. Once the new WIOA collection is implemented and all reporting requirements under WIA have been completed, ETA will request a discontinuation of the WIA Management Information and Reporting System.

ETA's statutory and regulatory authority to administer job training and employment programs includes provisions allowing for the requirement of performance reporting from states and grantees. WIA of 1998 (P.L. 105-220) and WIOA include provisions that require each state agency to furnish to the Secretary such information and reports and conduct such studies as the Secretary determines are necessary or appropriate for carrying out the purposes of the Act.

ETA seeks extension and approval of WIA reporting requirements during this transition period. Provisions will cover both individuals who were participants under WIA and new participants who enter the workforce system prior to full implementation of WIOA. For convenience we have included references to both the WIA statute and their corresponding updated sections within WIOA.

Information is collected through the WIA management information and reporting system under the following authority:

WIA section 136 establishes the performance and accountability requirements for WIA Adult, Dislocated Worker, and Youth programs. The purpose of section 136 of WIA is to establish a comprehensive performance accountability system, comprised of the activities described in this section, to assess the effectiveness of states and local areas in achieving continuous improvement of workforce investment activities funded under this subtitle, in order to optimize the return on investment of Federal funds in statewide and local workforce investment activities (WIA section 136(a)).

Further, WIA section 136(d) outlines the minimum requirements for the WIA annual reports that states must submit to DOL. The annual reports must reflect:

- The progress of the state in achieving state performance measures, including information on the levels of performance achieved by the state with respect to the core indicators of performance and the customer satisfaction indicator;
- The progress of local areas in the state in achieving local performance measures, including information on the levels of performance achieved by the areas with respect to the core indicators of performance and the customer satisfaction indicator;
- Information on the entry by participants who have completed training services provided under WIA section 134(d)(4) (now superseded by WIOA section 134(c)(3)) into unsubsidized employment related to the training received;
- Data on the wages at entry into employment for participants in workforce investment activities who entered unsubsidized employment, including the rate of wage replacement for such participants who are dislocated workers;
- Information on the retention and earnings received in unsubsidized employment 12 months after entry into employment;
- A description of performance with respect to the indicators of performance specified in WIA section 136(b)(2)(A) (core indicators of performance) of participants in workforce investment activities who received the training services compared with the performance of participants in workforce investment activities who received only services other than the training services (excluding participants who received only self-service and informational activities); and
- A summary of performance with respect to the indicators of performance specified in WIA section 136(b)(2)(A) (core indicators of performance) of recipients of public assistance, out-of-school youth, veterans, individuals with disabilities, displaced homemakers, and older individuals.

WIA sections 172 (superseded by WIOA section 169), 185 (WIOA section 185), and 189 (WIOA section 189) provide broad authority to the Secretary of Labor to address performance and accountability issues for all programs authorized under WIA (WIOA) title I.

WIA section 172 (superseded by WIOA section 169) directs the Secretary to provide for the continuing evaluation of programs and activities authorized under WIOA title I, including

demonstration grants. WIA section 172(a) (superseded by WIOA section 169(a)) specifies that the evaluations must address:

- General effectiveness of such programs and activities in relation to their cost, including the extent to which the programs and activities improve the employment competencies of participants in comparison to comparably-situated individuals who did not participate in such programs and activities and, to the extent feasible, increase the level of total employment over the level that would have existed in the absence of such programs and activities;
- 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 programs and activities meet the needs of various demographic groups; and
- Such other factors as may be appropriate.

WIA section 185 (WIOA section 185) broadly addresses reports, recordkeeping, and investigations across programs authorized under title I of WIA/WIOA. The provisions of WIA section 185 (WIOA section 185):

- Require the Secretary to ensure that all elements of the information required for reports be defined and reported uniformly (WIA (WIOA) section 185(d)(2));
- Direct each state, each Local Board, and each 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 WIA/WIOA section 188 (WIA (WIOA) section 185(c)(2));
- Require that recipients of funds under title I of WIA (WIOA) 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 of WIA (WIOA) (section 185(a)(2));
- Compel states to submit to the Secretary, on a quarterly basis, a summary of the reports submitted to the Governor under WIA (WIOA) sections 185(e)(1) and 185(e)(2);
- Specify that the reports shall include information about programs and activities carried out under title I of WIA (WIOA) 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; and
- Information necessary to prepare reports to comply with section 188 and 29 CFR Part 37 (38 under WIOA) (WIA/WIOA section 185(d)(1) and (a-e)).

WIA (WIOA) section 189 requires the Secretary to prepare and submit to Congress an annual report regarding the programs and activities carried out under title I of WIA (WIOA). The report must include:

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

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.

States are expected to implement reporting requirements with available funds. At a minimum, information collected and reported through the WIA Annual Report Form 9091, which is comprised of the data table and a narrative portion (see Attachment C), and Quarterly Report Form 9090 (see Attachment D) will be used by local workforce investment areas, State Workforce Agencies, and Federal agencies for the following purposes:

1. To provide program and performance information to stakeholders including participants, businesses, taxpayers, Congress, and others;
2. To continuously improve the quality, effectiveness, and efficiency of job training and employment programs;
3. To provide management information for use in Federal program administration and oversight, including grant-specific participation, service, and outcome summaries. Selected demographic information will also be used by grantees to demonstrate compliance with equal opportunity provisions in the law, and to prepare and maintain state management reports;
4. To administer incentives or sanctions for outcomes that exceed or fall short of negotiated levels of performance on the core measures;
5. Preparation and maintenance of consumer reports on eligible training providers;
6. To measure compliance with the Government Performance and Results Act (GPRA); and
7. To monitor the implementation of Veterans Priority of Service.

Under WIA section 136(d)(3), the Secretary is required to: (a) make the information contained in the annual reports available to the general public through publication and other appropriate methods, (b) disseminate state-by-state comparisons of information, and (c) provide the appropriate congressional committees with copies of such reports. In addition, information obtained through the WIA management information and reporting system will be used at the national level during budget and allocation hearings, for DOL compliance with the GPRA and other legislative requirements, and during legislative reauthorization proceedings.

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. Also, describe any consideration of using information technology to reduce burden.

In order to comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of WIA participant data and the preparation of quarterly and annual performance reports to the extent feasible by providing uniform data elements and data definitions to states, and through the use of technology (for example by using E-DRVS and automated wage record systems). All WIA reports and records will be aggregated automatically and submitted to ETA via the Internet. However, it is left to the states and local areas to decide the best technology for collecting individual case management data given their unique circumstances and resource availability. The one exception to this policy is that states must collect all information that is required in WIASRD, at a minimum. However, states may add additional items to the data sets but cannot submit that information in WIASRD.

The utilization of E-DRVS to import WIASRD-formatted records, to check for data errors and out of parameter records, and to produce the WIA annual and quarterly reports in both printable and electronic data transfer formats, as well as, the utilization of Unemployment Insurance (UI) wage records as the primary source of data on wages and employment-related outcomes will result in decreased burden hours for many states who administer WIA programs. ETA will continue to work with the states to streamline E-DRVS and to access and exchange UI wage records among the states.

4. Describe efforts to identify duplication.

There are currently two OMB control numbers through which ETA will collect data on performance information under WIOA (Control Numbers 1205-0NEW and 1205-3NEW). Some of the WIOA requirements that are addressed in the two proposed packages may overlap with the WIA requirements outlined in this collection. WIA performance requirements will continue to apply to the title I Adult, Dislocated Worker, and Youth programs and the title III Wagner-Peyser Employment Services program for several months after the performance requirements of WIOA take effect. For this reason, the four separate information collection requests (Control Numbers 1205-0420, 1205-0NEW, 1205-3NEW, and 1205-0240, which covers performance reporting on Wagner-Peyser Employment Service and Jobs for Veterans' state grants' activities) must be simultaneously active for several months to collect all required data. However, it is the intent of ETA to phase out this ICR within the next three years in an effort to reduce duplication for the States.

Under package 1205-3NEW, the WIOA reporting requirements will be more integrated. By combining the Wagner-Peyser Employment Service and Adults, Dislocated Workers, and Youth programs together in one data file submission, states will have a reduced burden by not having to report co-enrolled participants in multiple data files.

ETA has minimized the reporting burden by establishing the number of data elements required commensurate with the level of resources expended and services received. A very limited number of items are required for those accessing only core services. More items are required for those receiving intensive and/or training services given the service intensity and resources expended. Data items beyond those collected by existing program reports and individual records are needed to: (1) account for the detailed services provided by multiple agencies to help participants get and keep good paying jobs; (2) better identify overlapping and unproductive duplication of services; (3) generate comparable performance information across ETA-funded programs; (4) generate statistics on self and core services, which have not been measured before; and (5) readily identify and make program changes needed to reduce fraud, waste, and abuse. Information provided through the WIA Management Information and Reporting System is not available through other data collection and reporting systems.

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

The involvement of small businesses or other small entities for reporting purposes is extremely limited. In fact, the only time contacting them may be required is during the provision of a service or through the collection of customer satisfaction data. The survey questionnaire contains only three required Federal questions (though states may choose to add other items for their own purposes). The survey methodology uses a nationally recognized system employed in both the public and private sectors. States serving many customers may take advantage of a sampling method rather than contacting each business.

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 Workforce Investment Act is very specific about reporting requirements and reporting frequency. If we do not receive this information, we cannot fulfill our legislative mandate to provide employment and training services, and the subsequent data and performance outcomes related to those services.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

These data collection efforts do not involve any special circumstances.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize public

comments received in response to that notice and describe the actions taken by the agency in response to these comments.

In accordance with the Paperwork Reduction Act of 1995, the public has been given 60 days to comment on this information collection. The 60-day notice soliciting comments on the Extension of a Currently Approved Information Collection was published in the *Federal Register* on February 9, 2016 (81 FR 6891). No comments were received.

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

There is no payment to respondents other than the formula funds provided for in the WIA or WIOA.

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

ETA is responsible for keeping private the performance data and will maintain 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. Performance data collected at the federal level will not contain any individually identifying information. States will submit records on individuals but they will submit them using an individual identifier that must not be the individual's social security number. ETA's data systems will not accept identifiers that look like potential SSNs, providing an extra check on the unique identifiers. Furthermore, ETA randomly scrambles the unique identifiers and delimits all records coming from local areas containing less than 50 records when producing the publicly available WIASRD.

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.

There are no sensitive questions included in the proposed data collection. Individual records, which contain wage record information, must be submitted using a unique personal identifier rather than a Social Security Number.

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

The annual national burden for the WIA reporting system has the following four components: (1) the WIASRD participant record burden; (2) the quarterly summary report burden; (3) the annual summary report burden; and (4) the customer satisfaction burden. This response provides a separate burden for each of the components.

(1). WIASRD Participant Record Burden

The WIASRD burden considers the amount of information collected and reported on the WIASRD that would not have to be collected by the states as part of their customary and usual burden to run the program. Thus, the burden reflects the information collected solely to comply with the WIASRD federal reporting requirements. The majority of overall burden comes from the data collection step.

The WIASRD burden varies by participant based on the intensity of services provided and the number of WIASRD elements applicable to the participant. For example, considerably more information is reported on individuals in the youth program than on individuals in the adult program and collecting the youth literacy, numeracy, and skill attainment elements is more burdensome than collecting other types of data elements. On the other hand, web-based registrations, the use of wage records for verifying outcomes, the use of E-DRVS to generate the 9090 and 9091 reports, and the consolidation of the WIASRD and EBSS uploads into one upload in E-DRVS help to minimize the burden of data collection. For detailed information on the burden estimates associated with data validation, see the data validation PRA information collection request (OMB Control No. 1205-0448).

The WIASRD data collection burden calculation uses a minutes per record estimate. The minutes per record estimate is derived from the count of WIASRD data elements that are required for the record type, as well as the relative burden of collecting that data. For example, as mentioned above, it is relatively time consuming to collect each youth literacy, numeracy, and skill attainment element, and there are significantly more data elements that must be collected for individuals in the youth program than for those in the adult program. Therefore, youth records have significantly higher minutes per record estimates.

The annual burden hours represent the total annual burden associated with all four quarterly submissions using E-DRVS and minutes per record estimates for collection of WIA data elements. The total annual burden hour estimates were obtained by multiplying the number of PY 2013 WIASRD records by program and the minutes per record burden estimates associated with each record. The annual national burden hour estimates include the burden for each quarterly submission.

Record Type	Minutes Per Job Seeker Record	PY 2013 Annual National Counts	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Adult, DW, National Emergency Grant Exiters	17.7	1,733,096	511,263	\$25.50	\$13,037,215
Youth Exiters	54.3	102,723	92,964	\$25.50	\$2,370,590
Total		1,835,819	604,228		\$15,407,805

Hourly rates used to calculate cost is based on the estimated average hourly earnings for state-run programs according to the State Government, North American Industry Classification System (NAICS) code 926110 'Administration of general economic programs, All States and US' 2013 Annual Averages, Quarterly Census of Employment and Wages - Bureau of Labor Statistics

(http://www.bls.gov/cew/apps/table_maker/v3/table_maker.htm#type=0&year=2013&qtr=A&wn=2&ind=926110&supp=0).

Previously, the applicable hourly rate was based on the cost of 1.5 state administrative employees collecting, reporting, and certifying performance data. Due to the reduction in manual labor introduced with the updates in E-DRVS software, the hourly burden has been reduced to reflect the cost of just one state administrative employee.

The annual burden estimates equate to an average of 12,084.6 hours per state per year at an average cost of \$308,156 per state per year.

(2) and (3). Quarterly and Annual Report Burden

The WIA **quarterly and annual report burden** includes data formatting, uploading the quarterly WIASRD files to E-DRVS (i.e., the edit checks), as well as certifying the quarterly and annual reports before their transmission to ETA. States must certify the accuracy of the reports before they are accepted by ETA.

The current burden estimates include the time it takes to pass the edit checks and to confirm the accuracy of the data as the calculations and construction of the reports will be performed automatically for the states via the E-DRVS. The current data collection estimates that it takes one staff person 30 hours each quarter to upload the data (including passing the edit checks) and certify its accuracy. The annual reports, which include a narrative portion, are estimated to take double that amount of time as the ETA 9091 report contains substantially more information to verify in the certification step. E-DRVS calculates all the report items and transmits the completed reports to ETA automatically. The annual report hours are lower than the quarterly

report in the table below due to the fact that the 4th quarter and annual reports are derived from the same individual record submission. In other words, there is no data upload burden associated with the annual report.

Program	Hrs. Per Year Per State	Number of Reporting States	Annual National Hours	Applicable Hourly Rate	Annual National Quarterly Report Burden Dollars
Quarterly Report	120	53	6,360	\$25.50	\$162,180
Annual Report	80	53	4,240	\$25.50	\$108,120
Total	200	53	10,600		\$270,300

(4). Customer Satisfaction Survey Burden

The *customer satisfaction survey burden* considers the WIA's [WIA Section 136(b)(2)(B)] requirement that states measure satisfaction for employers and participants (job seekers) of state and local agencies that provide employment and training activities. The only changes in customer satisfaction burden associated with the current renewal request and the last approval concerns the number of states reporting on customer satisfaction in the WIA annual reports. When the WIA collection was last approved in 2013, 32 states had requested a waiver for reporting on customer satisfaction. Currently, all but four states have an approved waiver of reporting on customer satisfaction.

ETA has required that states use a standard measurement tool so that scores can be compared among states. Additionally, WIA Section 136(b)(3)(A)(I) requires state-adjusted levels of customer satisfaction performance that shall at a minimum:

- be expressed in an objective, quantifiable, and measurable form; and,
- show the progress of the state toward continuously improving performance.

Customer satisfaction surveys are conducted quarterly and reported electronically to ETA each year on the WIA Annual Report (Form 9090). Although the statute requires states to measure satisfaction, the majority of states have approved waivers to report on common performance measure outcomes only. These common measures focus on entered employment, retention, and earnings for adults and dislocated workers, and employment/education placement, degree/certificate attainment, and literacy/numeracy gains for youth. Therefore these states do not report to ETA on customer satisfaction. The remaining states (Vermont, Rhode Island, Michigan, and Minnesota), as well as Puerto Rico, still report on customer satisfaction; however, this measure is reported only in the state's WIA Annual Report and the results are not considered in determination of sanctions for poor performance.

The following assumptions are used:

Respondents – 417 hours (5 states * 1000 responses * 5 minutes per survey)
 Estimate based on 1,000 responses per reporting unit (500 participants and 500 employers) and 5 minutes (1/12 hr.) per survey. This assumes the three American Customer Satisfaction Index (ACSI) questions are asked. States may incur increased costs in the event additional questions are asked on the surveys.

Survey Administration – 3,415 hours (5 states * 1000 responses * 41 minutes per survey)
 Estimate based on 41 minutes to obtain a completed survey (telephone contacts, call-backs, data entry). This estimate assumes 50 percent of the respondents for each state will take an average of 30 minutes each, 25 percent will require an average of 45 minutes, and 25 percent will require an average of 60 minutes to obtain each completed survey.

Survey Preparation and Overhead – 770 hours (5 states * 154hrs/state)
 Estimate based on:

- Survey development* (preparation of questionnaire and telephone script for interviewer) - 40 hours per reporting unit
- Sample selection* - 24 hours per reporting unit
- Survey set-up* (setting up survey for telephone administration and creation of a database) - 40 hours per reporting unit
- Compilation of results* (includes generation of descriptive statistics and calculation of index for participants and employers) - 50 hours per reporting unit

Survey Task	Number of States ¹	Hours Per State Per Task/Yr	Responses per State	Total Responses	Total National Burden Hours/Yr	Applicable Hourly Rate	Total National Burden \$/Yr
Customer Responses	5	0.0833	1,000	5,000	417	\$25.50	\$10,621
Survey Admin.	5	683	1,000	5,000	3,415	\$25.50	\$87,083
Survey Prep and Overhead	5	154	1	5	770	\$25.50	\$19,635
Unduplicated Total	5	837	2,000	10,000	4,602	\$25.50	\$117,339

¹ = Only Vermont, Rhode Island, Michigan, Minnesota, and Puerto Rico do not have approved waivers and must report on customer satisfaction.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information (excluding the value of the burden hours in #12 above).

States have the necessary technology and data collection mechanisms in place to meet these reporting requirements. Therefore, the ETA is not reporting any start-up/capital costs or annual operating costs as a part of this information collection request. The costs to maintain and disclose these data are covered by states' existing grant funds.

14. Provide estimates of annualized cost to the Federal government.

The annual costs of maintaining the EBSS report repository, maintaining the quarterly reporting software (E-DRVS), and developing technical assistance guides are borne by ETA and are estimated to be \$775,000. Total annual costs to the Federal government are thus estimated to be \$775,000.

15. Explain the reasons for any program changes or adjustments.

The total burden hours have increased by 110,841 hours (from 508,589 to 619,430). The number of responses has increased by 453,746 (from 1,392,290 to 1,846,036). These changes are due to increase in the numbers of participants in the program.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

Product	Submission Date	Publishing Date
Individual Records	1 st quarter – November 15, annually. 2 nd quarter – February 15, annually. 3 rd quarter – May 15, annually. 4 th quarter – September 15, annually.	States submit WIASRD records (minus individual identifiers) through ETA's web-based reporting system (E-DRVS).
Quarterly Summary Report (ETA 9090)	Within 45 days following the end of the quarter.	Although the department will use this information to prepare GPRA, budget and ad hoc reports, it does not plan to publish the information separately.
Annual Report (ETA 9091)	October 1, annually.	DOL publishes WIA Annual Report data and Annual Report narratives on its website after the October submission date.

Customer Satisfaction Survey	Results of the survey will be submitted in the annual reports (States without a common measures waiver).	Included in the WIA Annual Report published on the website after the October submission date.
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17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why 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.

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