

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT**

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**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
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PART A – JUSTIFICATION

This is a justification for the Department of Labor’s request for approval to extend and revise a currently approved data validation requirement for six Employment and Training Administration (ETA) programs. Data validation assesses the accuracy of data collected and reported to ETA on program activities and outcomes. The accuracy and reliability of program reports submitted by states and grantees using federal funds are fundamental elements of good public administration, and are necessary tools for maintaining and demonstrating system integrity. The data validation requirement for employment and training programs strengthens the workforce system by ensuring that accurate and reliable information on program activities and outcomes is available. The following programs are subject to the data validation requirement: Workforce Investment Act (WIA) Title IB, Wagner-Peyser Act, Trade Adjustment Assistance (TAA), National Farmworker Jobs Program (NFJP), Indian and Native American Program, and Senior Community Service Employment (SCSEP).

1. Reasons for Data Collection

States and grantees receiving funding under WIA Title IB, Wagner-Peyser Act, TAA, and the Older Americans Act are required to maintain and report accurate program and financial information (WIA section 185 (29 U.S.C. 2935) and WIA Regulations 20 CFR 667.300(e)(2); Wagner-Peyser Act section 10 (29 U.S.C. 49i), Older Americans Act section 503(f)(3) and (4) (42 U.S.C. 3056a(f)(3) and (4)), and TAA Regulations 20 CFR 617.57). The text of these citations can be found in Appendix A. Further, all states and grantees receiving funding from ETA and the Veterans’ Employment and Training Service are required to submit reports or participant records and attest to the accuracy of these reports and records.

In 2001, the President announced a Management Agenda to improve the management and performance of the Federal government. One of the five government-wide goals – budget and performance integration – emphasizes the importance of complete information for program monitoring and improving program results.

The Department’s Office of Inspector General (OIG) conducted an audit of WIA performance data oversight from July 2000 through October 2001. The audit, released in September 2002, found that, “Because of insufficient local, state, and Federal oversight, the Employment and Training Administration (ETA) has little assurance that the state-reported WIA performance outcomes data are either accurate or verifiable.” The OIG recommended that states should validate reported data using a statistically valid sampling method. To address the concerns raised by the OIG and to meet the Agency’s goal for accurate and reliable data, ETA has implemented a data validation requirement in order to ensure the accuracy of data collected and reported on program activities and outcomes.

ETA has developed a process for validating data submitted by states and grantees. Data validation consists of two parts:

- 1) **Report validation** evaluates the validity of aggregate reports submitted to ETA by checking the accuracy of the reporting software used to calculate the reports. Report validation is conducted by processing a complete file of participant records into validation counts and comparing the validation counts to those reported by the state or grantee.
- 2) **Data element validation** assesses the accuracy of participant data records. Data element validation is conducted by reviewing samples of participant records against source documentation to ensure compliance with Federal definitions.

Since there are two basic sources of reporting error, both parts are necessary to ensure the validity of information reported to ETA. First, if the data collected are incorrect or data entry errors occur, then the outcome information will not be accurate. As described above, data element validation addresses this issue by comparing performance-related data in each state's participant record file to the original data in the source files and determining an error rate that indicates the degree of accuracy of each data element used in calculating the state's performance results. Second, even if the data collected are correct, if the state's or grantee's reporting system does not meet Federal standards, it could calculate the performance outcomes incorrectly. Report validation addresses this issue by independently calculating performance results for the data submitted by each state in its participant record file and comparing those results to the actual results reported by the state. Error rates are determined for each performance outcome reported by the state.

ETA has developed a set of validation tools discussed below – software and instructional user handbooks – that states and grantees can use to validate data.

WIA Title IB, Wagner-Peyser, and TAA program staff have been conducting data validation for three years. The states received training prior to beginning validation and receive ongoing training and technical assistance from ETA's data validation contractor throughout the validation process. NFJP grantees have been conducting data validation for two years and have received ongoing training and technical assistance during this period from ETA's data validation contractor. SCSEP grantees will begin data validation by the end of Calendar Year (CY) 2007. Indian and Native American program grantees will pilot validation by 2008.

In brief, the results of the past three years of data validation have indicated the following:

- States and grantees are able to conduct data validation with a reasonable, but sustained, level of effort.
- The validation process allows states and grantees to identify and address reporting errors.¹

¹ In the first year of validation, fifteen states had core performance report validation items with an error rate of greater than 4 percent. Twenty-three states had non-core report validation items with an error rate exceeding 4%. Numerous states sought and received technical assistance to determine and correct these report discrepancies. Results of data element validation have also identified significant discrepancies between some of the data submitted in state participant record files and the data contained in original participant source files. Analysis of these discrepancies is currently in process.

- States and grantees make reporting errors which need detecting and fixing.
- The average staff requirements for a state to complete validation for the WIA Title IB, Wagner-Peyser, and TAA programs are about 792 hours per year (or less than 1/2 of a staff year). There is no startup burden for these programs because this was incurred when data validation was first implemented three years ago. The average annual time estimate for NFJP, Indian and Native American program, and SCSEP grantees to complete validation is approximately 103 hours (or about 1/20 of a staff year). Startup activities for the Indian and Native American program and SCSEP will require an additional 75 hours on average per grantee in the initial year of validation. There is no NFJP startup burden because this was incurred when NFJP data validation was first implemented two years ago.

On the basis of three years of successful validation implementation, ETA wishes to extend and revise the data validation requirement for employment and training programs. In order to ensure the accuracy of reported information throughout the workforce investment system, states and grantees are required to conduct data validation. Data validation is required annually as follows:

- **Report validation** should be performed before submission of annual reports.
- **Data element validation** must be completed within 120 days after required annual reports or participant records are due to ETA. Exact deadlines for the completion of data validation will vary by program.
- States and grantees are required to send data element validation output reports to ETA within 120 days after the submission of required annual reports or participant records.

States and grantees operating ETA programs subject to the data validation requirement will validate the reports and participant records shown in Table 1 below.

Table 1 – Reports and Participant Record Files Validated

Program	Report/Records	OMB Approval No.	Expiration Date
Workforce Investment Act Title IB	ETA 9091 (annual report)	1205-0420	2/09
Wagner-Peyser	ETA 9002, VETS 200	1205-0240	2/09
Trade Adjustment Assistance	TAPR	1205-0392	1/09
National Farmworker Jobs Program	WIASPR	1205-0425	12/09
Indian and Native American	ETA 9085 (annual report) ETA 9084 (annual report)	1205-0422	12/07
Senior Community Service Employment Program	ETA 5140 (annual report)	1205-0040	6/07 ²

² DOL is currently seeking OMB approval for an extension of this reporting requirement.

The user handbooks for each program provide a more detailed overview of the validation process. These are available on ETA's validation tools web site at http://www.doleta.gov/performance/reporting/tools_datavalidation.cfm. A copy of Training and Employment Guidance Letter No. 3-03, which outlines ETA's data validation policy, is attached in Appendix B.

Copies of ETA's validation reports for the WIA Title IB program can be found in Appendices C and D. The Report Validation Summary and Summary and Analytical Reports for the other programs are based on the WIA template. The reports display the following approval information:

- **OMB Approval No.:** 1205-0448
- **Expires:** XX/XX/XXXX
- States/grantees are not required to respond to these reporting requirements unless they display an OMB approval number. Respondents' obligation to reply to these reporting requirements are mandatory per WIA section 185 (29 U.S.C. 2935) and WIA Regulations 20 CFR 667.300(e)(2); Wagner-Peyser Act section 10 (29 U.S.C. 49i), Older Americans Act section 503(f)(3) and (4) (42 U.S.C. 3056a(f)(3) and (4)), and TAA Regulations 20 CFR 617.57. Public reporting burden for the collection of information is estimated to average 164 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to Karen Staha or Traci DiMartini, U.S. Department of Labor, Employment and Training Administration, Office of Performance and Technology, Division of System Accomplishments, 200 Constitution Avenue, N.W., Room S5206, Washington, DC, 20210 (Paperwork Reduction Project No. 1205-0448).

2. Purpose of Information Collection

ETA uses data validation results to evaluate the accuracy of data collected and reported to ETA on program activities and outcomes. This information collection enables ETA to assure its customers, partners, and stakeholders of the validity of performance data which underlie the workforce accountability system. Further, data validation ensures that performance information used for WIA accountability purposes, and to meet Government Performance and Results Act (GPRA) responsibilities, are accurate.

Data validation was also developed with the goal of assisting states and grantees in providing more accurate data. Validation allows states and grantees to detect and identify specific problems with their reporting processes, including software and data issues, and to enable them to correct the problems. In addition, the tools developed by ETA help states and grantees analyze the causes of performance successes and failures by displaying participant data organized by performance outcomes. These tools are available at no cost to states and grantees.

For data validation to be effective and to allow for continuous improvement, ETA is establishing acceptable levels for the accuracy of reports and data elements in phases. For report validation,

the first three validation years focused on detecting and resolving any issues with state and grantee data and reporting systems. Error rates collected in these years will be analyzed and, based on this information, standards for accuracy will be established for the Program Year (PY) 2007 data validation. The implementation of a set of common performance measures has delayed the establishment of standards for data element validation until states have had at least two years to validate the same data elements.

Once accuracy standards are established, states and grantees will be held accountable for meeting those standards and will be required to address any issues concerning data accuracy. States and grantees that fail to meet accuracy standards will receive technical assistance from ETA and will develop and implement a corrective action plan. Data that do not meet accuracy standards will not be acceptable for measuring performance, and may keep the state or grantee from being eligible for incentives that are awarded based on performance results. Significant or unresolved deviation from accuracy standards may be deemed a failure to report.

3. Technology and Obstacles Affecting Reporting Burden

ETA knows of no technical obstacles to implementing and continuing data validation. ETA has developed standardized software and user handbooks that states and grantees can use to conduct data validation:

- **Software** developed by ETA generates samples, worksheets, and reports on data accuracy. For report validation, the software validates the accuracy of aggregate reports that are generated by the state's or grantee's reporting software and produces an error rate for each reported count. For data element validation, the software generates a sample of the participant records and data elements for the state or grantee to validate. The software produces worksheets on which the validator records information after checking the source documentation in the sampled case files. The software calculates error rates for each data element, with confidence intervals of 3.5 percent for large states/grantees and 4 percent for small states/grantees.
- **User handbooks** provide detailed information on software installation, building and importing a validation file, and completing report and data element validation. The handbooks also explain the validation methodology, including sampling specifications and data element validation instructions for each data element to be validated.

Currently, all states and grantees use the software provided by ETA to conduct validation for WIA Title IB, Wagner-Peyser, and TAA programs and the NFJP. States and grantees can obtain technical assistance on validation procedures and the use of the validation tools from ETA's data validation contractor.

As mentioned above, the ETA software can be used to generate the aggregate information required in reports submitted to ETA. States and grantees that use the software provided by ETA to generate this aggregate information are not required to conduct report validation. However,

states still must demonstrate that they used the validation software to calculate their aggregate reports.

For both report validation and data element validation, the ETA software uses the validation data provided by the states or grantees to produce validation summary reports which, in compliance with the Government Paperwork Elimination Act, are submitted via the system now used for electronic transmission of reports to ETA.

4. Duplication

The data validation requirement does not duplicate any existing ETA program.

5. Burden on Small Business or Other Small Entities

While data validation will mostly be conducted by state governments and large, private, non-profit organizations, some small entities will be required to conduct validation. Some of the grantees operating the NFJP, the Indian and Native American program, and the SCSEP are small, private, non-profit organizations providing services to a low number of individuals. However, because of the low burden estimates associated with data validation for these programs, this information collection will not have a significant economic impact on a substantial number of small entities as indicated in Item 5 on OMB 83-I.

The data element validation process allows states and grantees to select appropriate validation samples necessary to compute statistically significant error rates, rather than requiring the validation of every participant case file. To reduce the relative burden on smaller states and grantees as much as possible, the sample size for smaller entities is set to yield a less precise error rate than for larger grantees and states.

6. Consequences of Failure to Collect Data

As mentioned in Part A.1, ETA was criticized in the past for a lack of monitoring and a consequent inability to assure the validity of performance outcomes reported by states and grantees. ETA regional staff are conducting data quality reviews based on current data validation efforts to determine if states are in compliance with data validation guidelines. The proposed continuation of the data validation requirement will allow ETA to continue to address these issues. If data validation is discontinued, ETA will not be able to ensure that critical data used for performance reports and accountability purposes, to meet GPRA responsibilities, and for other management purposes are reliable.

7. Special Circumstances Involved in Collection of Data Validation Information

This request is consistent with 5 CFR 1320.5.

8. Pre-Clearance Notice and Responses

A Pre-clearance Notice was published in the Federal Register on June 1, 2007 (Vol. 72, No. 105, Pages 30639 thru 30641). Following the 60-day comment period, public comments will be reviewed and summarized. A copy of the FRN is attached in Appendix E. A copy of the comments and ETA's response will be attached in a new Appendix F after the comment period. The names of individuals who provided technical assistance on statistical aspects of the data validation design are provided in Part B.5.

9. Payments to Respondents

This information collection does not involve direct payments to respondents. However, ETA does provide administrative funding to the participating states and grantees, which are listed as the respondents for purposes of the Paperwork Reduction Act. The requirement to perform data validation derives from states' and grantees' responsibility to provide accurate information on program activities and outcomes to ETA. States and grantees are expected to provide resources from their administrative funds for the data validation effort. Validation of program performance is a basic responsibility of grantees, which are required to report program performance, under Department of Labor regulations (29 CFR 95.51 and 97.40).

10. Confidentiality

Participant record layouts used in data validation for the WIA Title IB, Wagner-Peyser, and TAA programs, the NFJP and the SCSEP have been revised to replace social security number fields with state-assigned individual identifiers. Data element validation involves accessing wage records by social security number in order to verify the accuracy of wage information contained in the participant records submitted to ETA. To protect the confidentiality of program participants, the validation software includes user functionality that allows program administrators to limit access to this information based on administrative clearance. Confidentiality is not an issue with report validation, which simply involves verifying the accuracy of aggregate reports submitted to ETA.

11. Questions of a Sensitive Nature

The data collection includes no questions of a sensitive nature.

12. Respondent Annual Burden

Data validation is estimated to require an annual burden of 69,331 hours and \$1,883,326 for all six programs subject to the validation requirement.

Burden estimates for state programs – WIA Title IB, Wagner-Peyser, and TAA – are outlined in Part 12.A. Data validation is estimated to require a total annual burden of 41,970 and \$1,364,025 for all state programs. Burden estimates for grantee programs – NFJP, Indian and Native American programs, and SCSEP – are outlined in Part 12.B. Data validation is estimated to require a total annual burden of 27,361 hours and \$519,301 for all grantee programs.

A. State Programs: WIA Title IB, Wagner-Peyser, and TAA

Table 2 provides an overview of the annual burden for the WIA Title IB, Wagner-Peyser, and TAA programs, including average hours and costs across states in all three programs. The estimated annual hours needed to conduct validation for these programs is 792 hours (rounded) on average per state and 41,970 hours for all states. The estimated annual cost of performing validation is \$25,736 on average per state and \$1,364,025 for all states.

Table 2 - Calculation of Combined Annual Burden for WIA Title IB, Wagner-Peyser, and TAA Programs

	No. of States	Hours per State	Total Hours	Rate in \$/hr	Total Cost
Large State	18	1,206	21,708	\$32.50	\$705,510
Medium State	18	746	13,428	\$32.50	\$436,410
Small State	17	402	6,834	\$32.50	\$222,105
All States Total	53	--	41,970	\$32.50	\$1,364,025
Average per State	--	792	--	\$32.50	\$25,736

- The calculation of the hours required to conduct validation includes sample size, the time for validators to review sampled case files (34 minutes per file), the travel time to local offices to review the files, and 15% of a supervisor’s time.
- States have been divided into three categories – large, medium, and small – based on the number of participants that exit a state’s program in a year. As discussed in Part B, the size of the state impacts the number of sampled case files that must be reviewed and the travel time to local offices.
- The annual travel time per office is estimated as 8 hours for large states, 6 hours for medium states, and 3 hours for small states. This estimate is based on the assumption that states will conduct data element validation separately for the WIA Title IB and TAA programs. If states conduct data element validation for both programs at the same time, the travel time required to perform validation will decrease.
- The hourly rate is the estimated average hourly earnings for employees in state Unemployment Insurance (UI) agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes).

B. Grantee Programs: NFJP, Indian and Native American, and SCSEP

Table 3 provides an overview of the annual burden for the NFJP, the Indian and Native American program, and the SCSEP, including average hours and cost across grantees in all three programs. The estimated annual hours needed to conduct validation for these programs is 103 hours (rounded) on average per grantee and 27,361 hours for all grantees. The estimated annual cost of conducting validation is \$1,960 on average per grantee and \$519,301 for all grantees.

Table 3 - Calculation of Annual Burden for NFJP, Indian and Native American, and SCSEP Grantees

	No. of Grantees	Hours per Grantee	Total Hours	Rate in \$/hr	Average Cost per Grantee	Total Cost
NFJP	50	158	7,900	\$11.76/\$32.50	\$2,055	\$102,750
Indian and Native American	141	53	7,473	\$11.76	\$623	\$87,843
SCSEP	74	162	11,988	\$11.76/\$32.50	\$4,442	\$328,708
All Grantees	265	--	27,361	\$11.76/\$32.50	--	\$519,301
Average per Grantee	--	103	--	--	\$1,960	--

- Total costs for each program in Table 3 were calculated by multiplying the number of grantees times the average cost per grantee. Tables 4, 5, and 6 show how the average cost per grantee was derived for each program. Please note that the total costs listed for each program in Tables 4, 5, and 6 deviate slightly from the total costs shown in Table 3 because the latter were derived using the average cost per grantee.
- The calculation of the hours required to conduct validation includes the time for validators to review sampled case files (40 minutes per file) and 15% of a supervisor’s time. (Travel is not required for grantees to conduct validation).
- The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state, county, and U.S. territory government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees and Federally-recognized tribes, the hourly rate is the average hourly earnings in the social assistance industry (CY 2006, Current Employment Statistics survey, U.S. Census Bureau, <http://data.bls.gov/PDQ/outside.jsp?survey=ce>).

Tables 4, 5, and 6 provide a more detailed account of the annual burden estimates for each grantee program. Per grantee figures in the Cost column of each table are rounded. As a result, the total cost for all grantees may deviate slightly from the product of total grantee hours and hourly rate.

Table 4 - Calculation of Annual Burden for NFJP

Type of grantee	No. of Grantees	Hours	Rate in \$/hr	Cost
Private Non-Profit	47	158 (per grantee)	\$11.76	\$1,858 (per grantee)
State or County Government	3	158 (per grantee)	\$32.50	\$5,135 (per grantee)
All Grantees	50	7,900	--	\$102,731
Avg. per Grantee	--	158	--	\$2,055

Note: The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state and county government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees, the hourly rate is the average hourly earnings in the social assistance industry (CY 2006, Current Employment Statistics survey, U.S. Census Bureau).

Table 5 - Calculation of Annual Burden for the Indian and Native American Program

Type of Grantee	No. of Grantees	Hours	Rate in \$/hr	Cost
Private Non-Profit	67	53 (per grantee)	\$11.76	\$623 (per grantee)
Federally-Recognized Tribe	74	53 (per grantee)	\$11.76	\$623 (per grantee)
All Grantees	141	7,473	--	\$87,843
Avg. per Grantee	--	53	--	\$623

Note: The hourly rate used to calculate cost is the average hourly wage in the social assistance industry (CY 2006, Current Employment Statistics survey, U.S. Census Bureau).

Table 6 - Calculation of Annual Burden for SCSEP

Type of Grantee	No. of Grantees	Hours	Rate in \$/hr	Cost
Private Non-Profit	18	162 (per grantee)	\$11.76	\$1,905 (per grantee)
State or U.S. Territory Government	56	162 (per grantee)	\$32.50	\$5,258 (per grantee)
All Grantees	74	11,988	--	\$328,738
Avg. per Grantee	--	162	--	\$4,442

Note: The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state and U.S. territory government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees, the hourly rate is the average hourly earnings in the social assistance industry (CY 2006, Current Employment Statistics survey, U.S. Census Bureau).

13. Estimated Cost to Respondents

Total startup costs in the initial year of data validation are estimated to be \$281,931 for all six programs. These costs are outlined in Tables 7, 8, and 9 below. The total annual cost burden for conducting data validation is estimated to be \$1,883,326 for all six programs, as described in Part A.12 above.

As the WIA Title IB, Wagner-Peyser, and TAA programs, and the NFJP have already implemented data validation, there is no startup burden for these programs. Table 7 provides an overview of the startup burdens for the Indian and Native American program and the SCSEP, including average hours of burden and cost across grantees in both programs. The startup cost for the Indian and Native American program and the SCSEP is \$1,311 on average per grantee and \$281,931 for all grantees. The hours necessary to perform validation startup activities are 75 hours on average per grantee and 16,072 hours for all grantees.

Table 7 - Calculation of Startup Burden for the Indian and Native American Program and the SCSEP

	No. of Grantees	Hours	Rate in \$/hr	Cost
Indian and Native American program	141	72 (per grantee)	\$11.76	\$847 (per grantee)
SCSEP	74	80 (per grantee)	\$11.76/\$32.50	\$2,196 (per grantee)
All Grantees	215	16,072	\$11.76/\$32.50	\$281,931
Average per Grantee	--	75	\$11.76/\$32.50	\$1,311

- Startup activities in the initial year of validation include developing a validation file, installing the ETA validation software, planning and training, and collating reports.
- The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state, county, and U.S. territory government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees and state- and Federally-recognized tribes, the hourly rate is the average hourly earnings in the social assistance industry (CY 2006, Current Employment Statistics survey, U.S. Census Bureau).

Tables 8 and 9 provide a more detailed account of the startup burdens for each grantee program. Per grantee figures in the Cost column of each table are rounded. As a result, the total cost for all grantees may deviate slightly from the product of total grantee hours and hourly rate.

Table 8 - Calculation of Startup Burden for the Indian and Native American Program

Type of Grantee	No. of Grantees	Hours	Rate in \$/hr	Cost
Private Non-Profit	67	72 (per grantee)	\$11.76	\$847 (per grantee)
Federally-Recognized Tribe	74	72 (per grantee)	\$11.76	\$847 (per grantee)
All Grantees	141	10,152	--	\$119,388
Avg. per Grantee	--	72	--	\$847

Note: The hourly rate used to calculate cost is the average hourly wage in the social assistance industry (CY 2006, Current Employment Statistics survey, U.S. Census Bureau).

Table 9 - Calculation of Startup Burden for the SCSEP

Type of Grantee	No. of Grantees	Hours	Rate in \$/hr	Cost
Private Non-Profit	18	80 (per grantee)	\$11.76	\$941 (per grantee)
State or U.S. Territory Government	56	80 (per grantee)	\$32.50	\$2,600 (per grantee)
All Grantees	74	5,920	--	\$162,538
Avg. per Grantee	--	80	--	\$2,196

Note: The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state and U.S. Territory government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees, the hourly rate is the average hourly earnings in the social assistance industry (CY 2006, Current Employment Statistics survey, U.S. Census Bureau).

14. Cost to Federal Government

Federal costs are the staff and contractor costs required to design, implement, and manage data validation as outlined in Tables 10 and 11 below. As indicated, contractor costs to develop software and other validation tools, provide training to grantees, and provide on-going technical assistance to grantees for the Indian and Native American and SCSEP programs will total \$500,000. The annual cost of contractor support to provide continual technical support to grantees and states and any needed updates to validation tools for WIA Title IB, Wagner-Peyser, and TAA programs and the NFJP will total approximately \$900,000 per year for all four programs. Costs for ETA staff to manage the data validation program will be \$58,453 during the development and implementation phase and \$268,866 per year for continuing operations.

Tables 10 and 11 - Cost of Data Validation to Federal Government

Development and Implementation Phase (Indian and Native American and SCSEP)	
Contractor Support	\$500,000
ETA Staff Total	\$58,453
1 GS-15 (1/10 time)	\$10,702
1 GS-14 (1/4 time)	\$22,746
1 GS-9 (1/8 time)	\$5,581
3 GS-12 (1/10 time)	\$19,424
Total Cost	\$558,453

Continuing Operations (WIA Title IB, Wagner-Peyser, TAA, and NFJP)	
Contractor Support	\$900,000
ETA Staff Total	\$268,866
1 GS-15 (1/8 time)	\$13,378
1 GS-14 (1/4 time)	\$22,746
1 GS-13 (1/2 time)	\$38,498
6 GS-12 (1/2 time)	\$194,244
Total Cost	\$1,168,866

Note: Staff costs are based on the average salaries for Department of Labor grade ranges as of January 2007.

15. Reasons for Program Change and Change in Burden

This is a request for a revised information collection that will require approximately 69,331 hours and \$1,883,326 towards ETA's Information Collection Budget (for all 6 programs implementing data validation). An additional 16,072 hours and \$281,931 in start-up burden in the initial year of validation is estimated for the Indian and Native American and SCSEP grantees.

These estimates represent a significant decrease in costs and a slight increase in hours from the current OMB inventory for ETA data validation. The change is attributable to three factors:

- The elimination of start-up costs for WIA Title IB, Wagner-Peyser, TAA, and NFJP validation
- Updates in the number of grantees required to conduct data validation
- Increase in the hourly cost of conducting data validation for private, nonprofit grantee staff.

16. Publication Information

ETA intends to publish results of data validation in an annual validation report.

17. Reasons for Not Displaying Date OMB Approval Expires

ETA will display approval information on the validation reports.

18. Exceptions to Certification

There are no exceptions to the certification statement in OMB 83-I.

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UNDER THE PAPERWORK REDUCTION ACT**

**PART B –
COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

1. Description of Universe and Selection Methods Used

As described in Part A of the Supporting Statement, the data validation methodology consists of two parts:

- 1) **Report validation** evaluates the validity of aggregate reports submitted to ETA by 53 states or territories. It does so by checking the accuracy of the state's reporting software used to calculate the reports. The universe for report validation comprises all participant records included in the extract file. Report validation is accomplished by independently processing an entire file of participant records, providing validation counts, and comparing the validation counts to those reported by the state or grantee.
- 2) **Data element validation** assesses the accuracy of participant data records. For Workforce Investment Act (WIA) Title IB, the universe for data element validation comprises records of participants who exited between April 1st of the year prior to the program year through March 31st of the current program year. For Wagner-Peyser, the universe for data element validation is comprised of participants who have been placed and retained in employment. For Trade Adjustment Assistance (TAA), the universe for data element validation comprises all Trade Act participant records submitted to ETA during the prior fiscal year. For the National Farmworker Jobs Program (NFJP), the universe for data element validation comprises all NFJP records submitted to ETA during the prior program year. Data element validation is performed by reviewing samples of participant records against source documentation to ensure compliance with federal definitions.

The data validation process results in an estimate of the error rates for each data element and each reported count. Error rates are estimated separately for each state or grantee for the WIA, TAA, and NFJP programs. Error rates cannot be estimated for Wagner-Peyser because statistically valid samples are not used.

The methodology for data element validation employs sampling to improve the efficiency of the validation process. To minimize states' and grantees' burden in performing validation consistent with producing a reliable estimate of the error rates, the data element validation process is designed to compute a reliable error rate using the smallest possible sample size. To accomplish these objectives, three sampling techniques are used:

- Variable sampling rates among states are used to reduce the burden on small states and grantees as much as possible.

- Oversampling high-risk and high-importance cases is used to provide a more accurate estimate of the error rate.
- For WIA Title IB and TAA programs, multistage sampling is employed. Samples of offices are selected, and records are selected for validation only within sampled offices. This multistage design reduces the number of locations that state staff must visit to access supporting documentation.

These sampling methods balance the numbers of records and the numbers of locations so that the overall burden is reduced as much as possible, while still achieving a reliable estimate of error.

To reduce the burden on states and grantees, ETA provides validation software that calculates the validation values, imports the reported counts, draws the data element validation samples, produces online and paper validation worksheets, calculates error rates, and produces the validation reports.

Data validation relies on existing records from state and grantee management information systems and case files. Response rate issues do not arise in the data validation program.

2. Procedures for the Collection of Information

A. Statistical Methodology for Stratification and Sample Selection

- Item B.1 above indicates that report validation does not require states to use samples.
- For data element validation, multistage samples of participant records will be drawn. Independent samples are selected in each state for 7 groups – TAA, NFJP, and 5 WIA groups (dislocated workers, NEG, adults, older youth, and younger youth). For TAA and NFJP, stratification is not employed within the samples either in the selection of offices or records. Stratification would not add substantially to the accuracy of error rate estimates. For WIA, stratification of offices is employed to reduce the burden of validation. Offices are stratified based upon the distribution of records of dislocated workers, NEG, adults, older youth, and younger youth.
- To increase the efficiency of the process, records receive a risk weight of 1, 2, or 3 based upon two factors: whether the record is a success for calculating performance (i.e., whether the adult, dislocated worker, NEG, older youth, TAA participant, or NFJP participant was employed in the first quarter after exit or the younger youth received a diploma within one quarter after exit), and the risk that the data used to calculate performance are in error. In addition, WIA records receive a density weight that equals the number of elements to be validated per record. The two weights are added to determine a composite weight. The composite weights result in oversampling records that are more likely to contain

errors and are judged to be more substantively important (i.e., an error in such a record would be more important for a state or grantee).

- For WIA title IB programs, offices are selected at the first stage for the data element validation. Each office is assigned a weight equal to the sum of the weights for the individual records associated with that office. For each state’s WIA validation, offices are stratified. Up to 5 strata may be created. The strata are based upon the number of offices in the state, the weight of each office, and the distribution of records across the 5 WIA groups. Up to 15 offices may be selected per stratum, leading to a maximum of 75 offices sampled for the state.
- For TAA programs, offices are selected at the first stage for the data element validation. Each office is assigned a weight equal to the sum of weights for the individual records associated with that office. For each state’s TAA validation, a sample of offices is then selected using probability proportional to size (PPS) methods. The selection probability of an office is based upon the total number of offices in the state and the weight of that office. Samples of records are then drawn from within the selected offices. Each record has a probability of selection proportional to its weight. The expected number of offices selected in a state is based on the total number of offices shown in Table A.
- For NFJP, no offices are sampled. Records are sampled directly. Each record has a probability of selection proportional to its weight.

Table A
TAA OFFICE SAMPLING

	Number of Offices in State (N)	Number of Offices Sampled (n)
	A	B
1	250 or more	30
2	200-249	25
3	100-199	20
4	75-99	15
5	30-74	10
6	7-29	7
7	Fewer than 7	All

To reduce the relative burden on small states and grantees, their samples are smaller. After standards are established, it is reasonable to implement a design that holds smaller states to a lower standard of precision (hence, a smaller sample) because smaller states have fewer resources to devote to validation and they have a smaller impact upon national performance. The sample sizes are set so that the samples drawn have a maximum 95 percent confidence interval of +/- 3.5 percentage points for larger states and grantees and +/- 4 percentage points for smaller states and grantees, given certain assumptions. These assumptions are that the error rate is 5.0

percent and that the use of multistage sample selection and unequal sampling rates will result in a design effect of 2.0; that is, they will increase the variance of sample estimates by a factor of 2.0 compared to the variance of simple random samples of the same size. Where a substantial proportion of the universe of records will be sampled, allowances are also made for the finite population correction. Tables B and C show the ranges of overall sample sizes for states for WIA and TAA. Table D shows the ranges of overall sample sizes for NFJP grantees.

Table B
WIA EXITER RECORD SAMPLING

	A	B	C
	# of Exiters	Half-Length of the Confidence Interval	Range of Sample Size
1	500 or greater	3.5%	187-350
2	0-499	4%	0-187

Table C
TAA EXITER RECORD SAMPLING

	A	B	C
	# of Exiters	Half-Length of the Confidence Interval	Range of Sample Size
1	300 or greater	3.5%	100-180
2	0-299	4%	0-113

Table D
NFJP EXITER RECORD SAMPLING

	A	B	C
	# of Exiters	Half-Length of the Confidence Interval	Range of Sample Size
1	300 or greater	3.5%	100-150
2	0-299	4%	0-83

B. Estimation Procedure

For report validation, the states and grantees compare their annual reported values to the validation values to determine if the error rate is within an acceptable range. In the future, ETA will set standards for acceptable error rates for report validation.

For data element validation, estimation will include computing sample weights and estimates of error rates. Validators compare the data from the samples to source documentation. Once all the data have been evaluated, error rates are calculated for each data element. These error rates are estimated using data weighted to account for differences in probability of selection. During the initial year, states will not produce estimates of the precision of estimated error rates. In later years, after standards for the states have been established, precision estimates will be used to evaluate whether the sample error rate estimates indicate that a state has failed to meet the established standards. The validation software computes the sampling errors for each state or grantee, taking into account the multistage design and the use of unequal weights.

C. Degree of Accuracy Needed for Purpose Described in the Justification

For data validation to be effective and to allow for continuous improvement, ETA is establishing acceptable levels for the accuracy of reports and data elements in phases. Error rates for report validation and data element validation will be established independently of one another based on the analysis of validation efforts currently underway. For report validation, the first three validation years focused on detecting and resolving any issues with state and grantee data and reporting systems. Error rates collected in these years will be analyzed and, based on this information, standards for accuracy will be established for the Program Year (PY) 2007 report validation. The implementation of a set of common performance measures has delayed the establishment of standards for data element validation until states have had at least two years to validate the same data elements. Once accuracy standards are established, states and grantees will be held accountable for meeting those standards and will be required to address any issues concerning data accuracy.

D. Unusual Problems Requiring Specialized Sampling Procedures

The discussion above indicates that the methodology uses specialized sampling procedures. Strictly speaking, none of these are required. By using sampling techniques, however, the burden that data element validation imposes upon the states and grantees is significantly reduced.

3. Response Rates

As mentioned in Part 1, response rate issues do not arise in the data validation program. Data validation relies on existing records from state and grantee management information systems and case files. Through the use of valid sampling techniques, the validation

process results in estimates of data accuracy that can be generalized to the universe of data reported to ETA on program performance and activities.

4. Tests of Procedures or Methods

WIA Title IB, Wagner-Peyser, and TAA program staff have been conducting data validation for three years; the NFJP has been conducting validation for two years. The states and grantees received training prior to beginning validation and receive ongoing training and technical assistance from ETA’s data validation contractor throughout the validation process. Results of these data validation activities indicate that the methodology has functioned as intended and has enabled states to identify and address reporting errors.

5. Individuals Consulted on Statistical Aspects of the Design

<p>William S. Borden Senior Fellow Mathematica Policy Research, Inc. (609) 275-2321</p>	<p>Donsig Jang Senior Statistician Mathematica Policy Research, Inc. (202) 484-4246</p>
<p>John Eltinge Assistant Commissioner for Survey Method Research Bureau of Labor Statistics U.S. Department of Labor (202) 691-7404</p>	<p>Jonathan Ladinsky Senior Program Analyst Mathematica Policy Research, Inc. (609) 275-2250</p>
<p>John Hall Senior Sampling Statistician Mathematica Policy Research, Inc. (609) 799-3535</p>	

APPENDIX A
LEGAL AUTHORITY

LEGAL AUTHORITY

Workforce Investment Act Section 185 (29 USC 2935)

SEC. 185. REPORTS; RECORDKEEPING; INVESTIGATIONS

(a) Reports.--

(1) In general.--Recipients of funds under this title shall keep records that are sufficient to permit the preparation of reports required by this title and to permit the tracing of funds to a level of expenditure adequate to ensure that the funds have not been spent unlawfully.

(2) Submission to the secretary.--Every such recipient 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 this title. Such records and reports shall be submitted to the Secretary but shall not be required to be submitted more than once each quarter unless specifically requested by Congress or a committee of Congress, in which case an estimate may be provided.

(3) Maintenance of standardized records.--In order to allow for the preparation of the reports required under subsection (c), such recipients shall maintain standardized records for all individual participants and provide to the Secretary a sufficient number of such records to provide for an adequate analysis of the records.

(4) Availability to the public.--

(A) In general.--Except as provided in subparagraph (B), records maintained by such recipients pursuant to this subsection shall be made available to the public upon request.

(B) Exception.--Subparagraph (A) shall not apply to--

(i) information, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy; and

(ii) trade secrets, or commercial or financial information, that is obtained from a person and privileged or confidential.

(C) Fees to recover costs.--Such recipients may charge fees sufficient to recover costs applicable to the processing of requests for records under subparagraph (A).

(b) Investigations of Use of Funds.--

(1) In general.--

(A) Secretary.--In order to evaluate compliance with the provisions of this title, the Secretary shall conduct, in several States, in each fiscal year, investigations of the use of funds received by recipients under this title.

(B) Comptroller general of the united states.--In order to ensure compliance with the provisions of this title, the Comptroller General of the United States may conduct investigations of the use of funds received under this title by any recipient.

(2) Prohibition.--In conducting any investigation under this title, the Secretary or the Comptroller General of the United States may not request the compilation of any information that the recipient is not otherwise required to compile and that is not readily available to such recipient.

(3) Audits.--

(A) In general.--In carrying out any audit under this title (other than any initial audit survey or any audit investigating possible criminal or fraudulent conduct), either directly or through

grant or contract, the Secretary, the Inspector General of the Department of Labor, or the Comptroller General of the United States shall furnish to the State, recipient, or other entity to be audited, advance notification of the overall objectives and purposes of the audit, and any extensive recordkeeping or data requirements to be met, not later than 14 days (or as soon as practicable), prior to the commencement of the audit.

(B) Notification requirement.--If the scope, objectives, or purposes of the audit change substantially during the course of the audit, the entity being audited shall be notified of the change as soon as practicable.

(C) Additional requirement.--The reports on the results of such audits shall cite the law, regulation, policy, or other criteria applicable to any finding contained in the reports.

(D) Rule of construction.--Nothing contained in this title shall be construed so as to be inconsistent with the Inspector General Act of 1978 (5 U.S.C. App.) or government auditing standards issued by the Comptroller General of the United States.

(c) Accessibility of Reports.--Each State, each local board, and each recipient (other than a subrecipient, subgrantee, or contractor of a recipient) receiving funds under this title--

(1) shall make readily accessible such reports concerning its operations and expenditures as shall be prescribed by the Secretary;

(2) shall prescribe and maintain comparable management information systems, in accordance with guidelines that shall be prescribed by the Secretary, designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant, and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188; and

(3) shall monitor the performance of providers in complying with the terms of grants, contracts, or other agreements made pursuant to this title.

(d) Information To Be Included in Reports.--

(1) In general.--The reports required in subsection (c) shall include information regarding programs and activities carried out under this title pertaining to--

(A) the relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants;

(B) the programs and activities in which participants are enrolled, and the length of time that participants are engaged in such programs and activities;

(C) outcomes of the programs and activities for participants, including the occupations of participants, and placement for participants in nontraditional employment;

(D) specified costs of the programs and activities; and

(E) information necessary to prepare reports to comply with section 188.

(2) Additional requirement.--The Secretary shall ensure that all elements of the information required for the reports described in paragraph (1) are defined and reported uniformly.

(e) Quarterly Financial Reports.--

(1) In general.--Each local board in the State shall submit quarterly financial reports to the Governor with respect to programs and activities carried out under this title. Such reports shall include information identifying all program and activity costs by cost category in accordance with generally accepted accounting principles and by year of the appropriation involved.

(2) Additional requirement.--Each State shall submit to the Secretary, on a quarterly basis, a summary of the reports submitted to the Governor pursuant to paragraph (1).

(f) Maintenance of Additional Records.--Each State and local board shall maintain records with respect to programs and activities carried out under this title that identify-

(1) any income or profits earned, including such income or profits earned by subrecipients; and

(2) any costs incurred (such as stand-in costs) that are otherwise allowable except for funding limitations.

(g) Cost Categories.--In requiring entities to maintain records of costs by category under this title, the Secretary shall require only that the costs be categorized as administrative or programmatic costs.

Workforce Investment Act Regulations 20 CFR 667.300 (e) (2)

Subpart C--Reporting Requirements

(e) Annual performance progress report. An annual performance progress report for each of the three programs under title I, subpart B is required by WIA section 136(d).

(1) A State failing to submit any of these annual performance progress reports within 45 days of the due date may have its grant (for that program or all title I, subpart B programs) for the succeeding year reduced by as much as five percent, as provided by WIA section 136(g)(1)(B).

(2) States submitting annual performance progress reports that cannot be validated or verified as accurately counting and reporting activities in accordance with the reporting instructions, may be treated as failing to submit annual reports, and be subject to sanction. Sanctions related to State performance or failure to submit these reports timely cannot result in a total grant reduction of more than five percent. Any sanction would be in addition to having to repay the amount of any incentive funds granted based on the invalid report.

Wagner-Peyser Act Section 10 (29 USC 49i)

SEC. 10. (a) Each State shall keep records that are sufficient to permit the preparation of reports required by this Act and to permit the tracing of funds to a level of expenditure adequate to insure that the funds have not been spent unlawfully.

(b)(1) The Secretary may investigate such facts, conditions, practices, or other matters which the Secretary finds necessary to determine whether any State receiving funds under this Act or any official of such State has violated any provision of this Act.

(2)(A) In order to evaluate compliance with the provisions of this Act, the Secretary shall conduct investigations of the use of funds received by States under this Act.

(B) In order to insure compliance with the provision of this Act, the Comptroller General of the United States may conduct investigations of the use of funds received under this Act by any State.

(3) In conducting any investigation under this Act, the Secretary or the Comptroller General of the United States may not request new compilation of information not readily available to such State.

(c) Each State receiving funds under this Act shall--

(1) make such reports concerning its operations and expenditures in such form and containing such information as shall be prescribed by the Secretary, and

(2) establish and maintain a management information system in accordance with guidelines established by the Secretary designed to facilitate the compilation and analysis of programmatic and financial data necessary for reporting, monitoring, and evaluating purposes.

Older Americans Act Section 503 (f) (3) and (4) (42 USC 3056)

(f) (2) Each grantee described in receiving funds under this title shall comply with the applicable uniform cost principles and appropriate administrative requirements for grants and contracts that are applicable to the type of entity receiving funds, as issued as circulars or rules of the Office of Management and Budget

(3) Each grantee described in paragraph (2) shall prepare and submit a report in such manner and containing such information as the Secretary may require regarding activities carried out under this title.

(4) Each grantee described in paragraph (2) shall keep records that –

(A) are sufficient to permit the preparation of reports required pursuant to this title;

(B) are sufficient to permit the tracing of funds to a level of expenditure adequate to ensure that the funds have not been spent unlawfully; and

(C) contain any other information that the Secretary determines to be appropriate

Trade Adjustment Assistance for Workers 20 CFR 617.57

Recordkeeping; disclosure of information

(a) Recordkeeping. Each State agency will make and maintain records pertaining to the administration of the Act as the Secretary requires and will make all such records available for inspection, examination and audit by such Federal officials as the Secretary may designate or as may be required by law. Such recordkeeping will be adequate to support the reporting of TAA activity on reporting form ETA 563 approved under OMB control number 1205-0016.

(b) Disclosure of information. Information in records maintained by a State agency in administering the Act shall be kept confidential, and information in such records may be disclosed only in the same manner and to the same extent as information with respect to UI and the entitlement of individuals thereto may be disclosed to an employer or any other person except to the extent necessary to obtain information from the employer or other person for the purposes of this Part 617. This provision on the confidentiality of information maintained in the administration of the Act shall not apply, however, to the

Department or for the purposes of Section 617.55 or paragraph (a) of this section, or in the case of information, reports and studies required pursuant to Section 617.61, or where the result would be inconsistent with the Freedom of Information Act (5 U.S.C. 552), the Privacy Act of 1974 (5 U.S.C. 552a), or regulations of the Department promulgated thereunder (see 29 CFR Parts 70 and 70a.

APPENDIX B

TEGL 3-03, CHANGE 3

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Data Validation
	CORRESPONDENCE SYMBOL PRO
	DATE July 15, 2005

TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 3-03, Change 3

TO: ALL STATE WORKFORCE AGENCIES
ALL STATE WORKFORCE LIAISONS

FROM: EMILY STOVER DeROCCO
Assistant Secretary



SUBJECT: Revision to the Data Validation Policy for Employment and Training Programs for Program Year 2004

1. Purpose. To provide revisions and clarifications to policy guidance previously issued to states and national program grantees concerning the Employment and Training Administration's (ETA) data validation policy, for the following programs: Workforce Investment Act (WIA) Title IB; the Wagner-Peyser Act; activities authorized under chapter 41 of title 38, United States Code (Local Veterans Employment Representative and Disabled Veteran Outreach Service programs); and Trade Adjustment Assistance (TAA), National Farmworker Jobs (NFJP), Indian and Native American (INA), and Senior Community Service Employment (SCSEP) programs.

2. References. Training and Employment Notice (TEN) No. 14-02, "Data Validation Initiative;" TEN No. 8-02, "Implementation of Common Performance Measures for Job Training and Employment Programs;" Training and Employment Guidance Letter (TEGL) 3-03, Change 1, "Data Validation Policy for Employment and Training Programs;" and the President's Management Agenda (<http://www.whitehouse.gov/omb/budget/fy2002/mgmt.pdf>).

3. Background. In TEGL No. 3-03, Change 1, the Department issued policy guidance to states and national program grantees on the timeframes for implementing data validation requirements on program performance reports. This guidance outlines revisions to those implementation timeframes and updates information on data validation software. For Program Year (PY) 2004 (July 1, 2004 - June 30, 2005), report validation **must** be completed prior to submission of the annual report in accordance with the timetables specified below. ^{The TET}

4. Implementation for State Programs. Reporting instructions for data validation for state programs are available in revised handbooks on ETA's performance website at <http://www.doleta.gov/performance/>. The timeframes for implementation are as follows:

RESCISSIONS	EXPIRATION DATE Continuing
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Workforce Investment Act Title IB. For PY 2004, each state is required to submit a validated annual report no later than October 1, 2005, and the appropriate WIA Standardized Record Data (WIASRD) files no later than October 15, 2005. **States are required to complete report validation prior to submitting the annual report (ETA 9091) due October 1, 2005, and data element validation using a file of exiters and participants reported on the ETA 9091 by February 1, 2006.** These data are consistent with last year's timetable. Data element validation is due 120 days after the submission of the annual report, not the submission of the WIASRD files.

Core Job Matching and Employment Service Activities. Each state is required to submit the ETA 9002 and VETS 200 reports on a quarterly basis no later than 45 days after the end of the report quarter. The Wagner-Peyser funded programs require report validation and minimal data element validation. **Report validation must be completed for the ETA 9002 and VETS 200 reports prior to submission on August 15, 2005.** This date reflects a change to the data validation policy for the Wagner-Peyser programs. This year, states are required to validate their fourth quarter report for Program Year 2004. **This change will allow states to complete data validation using current reporting requirements.** A minimal data element validation sample of 25 job seekers must be reviewed and compared to state-level data prior to submitting the ETA 9002 and VETS 200 reports, to ensure that the files used to conduct report validation were properly constructed. States that use the ETA-provided software or DART software to prepare their ETA 9002 and VETS 200 quarterly reports do not need to conduct separate report validation.

Trade Adjustment Assistance. Each state is required to submit its fourth quarter Trade Act Participant Report (TAPR) for Fiscal Year (FY) 2005 by **November 15, 2005.** States administering TAA programs are not required to submit an annual report but are required to submit individual participant records; therefore, states are not required to conduct report validation. States are required to conduct data element validation on the cumulative file of four quarters of the FY 2005 TAPR (created by adding the four quarterly files together). **The data element validation for TAA programs must be completed by February 1, 2006.**

5. Implementation for National Programs. Reporting instructions for data validation for national grant programs will be issued separately. The timeframes for implementation are as follows:

National Farmworker Jobs Program. The NFJP grantees are not required to submit an annual report but are required to submit individual participant records; therefore, they are not required to conduct report validation. **The final NFJP participant data for PY 2004 is due February 15, 2006. Data element validation for PY 2004 must be completed by June 15, 2006.**

Indian and Native American Program. Grantees are required to submit their annual ETA 9084 Comprehensive Services Report by September 30 (90 days after the June 30 program year end date). Validation software for the INA program is still in development. Instructions, training, and timetables for data validation will be issued at a later date.

Senior Community Service Employment Program. The SCSEP is creating a new data collection and reporting system. The first SCSEP “annual report” will not be required until fall 2005. Data validation instructions, training, and timetables will be issued at a later date for this program.

6. Data Validation Tools. ETA has developed and updated instructional handbooks, standardized software, and user guides that states and grantees can use to perform data validation.

- Handbooks provide detailed information on the validation methodology, including sampling specifications and data element validation instructions for each data element to be validated. ETA provided guidance detailing source documentation requirements to validate eligibility, services, and outcomes for the WIA, TAA, and the NFJP in TEGL 3-03, Change 1 (see Attachment A).
- A maintenance release of the WIA data validation software (version 3.1) will be released in August 2005. The updated software will be available in time for states and grantees to use it to validate the annual reports due by October 1, 2005.
- States should use the current version (2.01) of the Wagner-Peyser program software available on the ETA performance website, <http://www.doleta.gov/performance/>, to validate the annual PY 2004 report due August 15, 2005. The minimal data element validation of 25 jobseekers must also be completed prior to the submission of the report.
- States should use the current TAA (1.3) data validation software available on the ETA performance website.
- States will use the current NFJP (1.2) data validation software available on the ETA performance website.
- User guides developed for each ETA validation software application guide states and grantees through the process of installing the application, building and loading a validation file, and completing report and data element validation.

ETA’s validation handbooks, software applications, and user guides for each program can be found on ETA’s website at <http://www.doleta.gov/performance/>. Click on the link for *Reporting Guidance and Data Evaluation* and go to the third bullet point, *Data Validation and more*. The validation tools for the WIA Title IB, ES, TAA, and NFJP programs are currently available and reflect the reduction in data elements; tools for the other national program grantees will be posted when finalized.

7. Training and Technical Assistance. States and grantees are encouraged to request technical assistance on validation procedures and the use of the validation tools by contacting regional and/or national office program staff. To avoid unnecessary delays and problems in the implementation of data validation, regional staff are available to facilitate the validation process and to address any difficulties states and grantees encounter. E-mail and phone contact

information is available on the ETA website listed above, in the Help menu of each software application, and in the user guides.

8. Monitoring. To ensure that states and grantees are able to successfully complete validation procedures and standards, ETA will monitor the validation effort on a regular schedule. The record retention requirement that will apply to records of all validation activities, including files, worksheets, reports, and source documentation, is three years.

9. Action Required. States and grantees are expected to:

- Distribute this advisory to the appropriate program staff.
- Complete data validation within the timeframes established in Section 5 of this guidance and provide the appropriate regional office with an update on the validation process.

10. Inquiries. Questions regarding the data validation initiative should be directed to the appropriate ETA regional office or to the Office of National Programs, as appropriate.

Attachment A: Source Documentation Requirements from TEGL 3-03, Change 1

APPENDIX C
REPORT VALIDATION SUMMARY

WIA Report Validation Summary - Adult**Comments:**

Report Cell	Report Item	Validation Value	Reported Value	Difference	%Error Rate
9091/B3	EER Numerator	680	0	680	100.00
9091/B4	EER Denominator	712	0	712	100.00
9091/B2	EER Rate	95.5	0	95	95.50
9091/B7	Retention Numerator	544	0	544	100.00
9091/B8	Retention Denominator	1256	0	1,256	100.00
9091/B6	Retention Rate	43.3	0	43	43.30
9091/B11	Earnings Change Numerator	1306638	0	1,306,638	100.00
9091/B12	Earnings Change Denominator	360	0	360	100.00
9091/B10	Earnings Change	3629.6	0	3,629	100.00
9091/B15	Employment and Credential Numerator	72	0	72	100.00
9091/B16	Employment and Credential Denominator	566	0	566	100.00
9091/B14	Employment and Credential Rate	12.7	0	12	12.70
9091/C2	Public Assistance EER Numerator	340	0	340	100.00
9091/C3	Public Assistance EER Denominator	356	0	356	100.00
9091/C1	Public Assistance EER Rate	95.5	0	95	95.50
9091/C14	Public Assistance Retention Numerator	272	0	272	100.00
9091/C15	Public Assistance Retention Denominator	648	0	648	100.00
9091/C13	Public Assistance Retention Rate	42.0	0	42	42.00
9091/C26	Public Assistance Earnings Change Numerator	705798	0	705,798	100.00
9091/C27	Public Assistance Earnings Change Denominator	200	0	200	100.00
9091/C25	Public Assistance Earnings Change	3529.0	0	3,529	100.00
9091/C38	Public Assistance Employment and Credential Numerator	72	0	72	100.00
9091/C39	Public Assistance Employment and Credential Denominator	433	0	433	100.00

States/grantees are not required to respond to these reporting requirements unless they display an OMB approval number. Respondents' obligation to reply to these reporting requirements are mandatory per WIA section 185 (29 U.S.C. 2935) and WIA Regulations 20 CFR 667.300(e)(2); Wagner-Peyser Act section 10 (29 U.S.C. 49i), Older Americans Act section 503(f)(3) and (4) (42 U.S.C. 3056a(f)(3) and (4)), and TAA Regulations 20 CFR 617.57. Public reporting burden for the collection of information is estimated to average 217 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to the Employment and Training Administration, U.S. Department of Labor, Office of Performance and Technology, Division of System Accomplishments, 200 Constitution Avenue, N.W., Washington, DC, 20210 (Paperwork Reduction Project No. 1205-0448).

APPENDIX D

SUMMARY/ANALYTICAL REPORT

WIA Data Element Validation Summary and Analytical Report

Period: 07/01/2002 - 06/30/2003

Group: Adults

Number of Cases: 147

Validated Cases: 1

Data Element	Ref. #	# of Errors	Overall Error Rate	Reported Data Error Rate
DOB	2	0.00	0.00%	0.00%
Disability	3	0.00	0.00%	0.00%
Vet	4	0.00	0.00%	0.00%
EmpStatus	5	0.00	0.00%	0.00%
UCClaimant	6	1.00	0.70%	100.00%
LowIncome	7	1.00	0.70%	100.00%
TANF	8	1.00	0.70%	100.00%
CashAssist	9	0.00	0.00%	0.00%
GradeComp	10	1.00	0.70%	100.00%
DisplacedHomemaker	11	0.00	0.00%	0.00%
WIAIBRegDate	19	1.00	0.70%	100.00%
WIAExitDate	20	0.00	0.00%	0.00%
SuppService	21	1.00	0.70%	100.00%
NeedsPayments	22	0.00	0.00%	0.00%
IntensiveServDate	23	0.00	0.00%	0.00%
TrainServDate	24	0.00	0.00%	0.00%
EstablTA	25	0.00	0.00%	0.00%
RecvdBasicSkillsService	26	0.00	0.00%	0.00%
OJT	27	0.00	0.00%	0.00%
RecvdSkillsTrain	28	0.00	0.00%	0.00%

States/grantees are not required to respond to these reporting requirements unless they display an OMB approval number. Respondents' obligation to reply to these reporting requirements are mandatory per WIA section 185 (29 U.S.C. 2935) and WIA Regulations 20 CFR 667.300(e)(2); Wagner-Peyser Act section 10 (29 U.S.C. 49i), Older Americans Act section 503(f)(3) and (4) (42 U.S.C. 3056a(f)(3) and (4)), and TAA Regulations 20 CFR 617.57. Public reporting burden for the collection of information is estimated to average 217 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to the Employment and Training Administration, U.S. Department of Labor, Office of Performance and Technology, Division of System Accomplishments, 200 Constitution Avenue, N.W., Washington, DC, 20210 (Paperwork Reduction Project No. 1205-0448).

APPENDIX E

FEDERAL REGISTER NOTICE

of the Act, which, among other things, require a fiduciary to discharge his duties respecting the plan solely in the interest of the participants and beneficiaries of the plan and in a prudent fashion in accordance with section 404(a)(1)(b) of the Act; nor does it affect the requirement of section 401(a) of the Code that the plan must operate for the exclusive benefit of the employees of the employer maintaining the plan and their beneficiaries;

(2) Before an exemption may be granted under section 408(a) of the Act and/or section 4975(c)(2) of the Code, the Department must find that the exemption is administratively feasible, in the interests of the plan and of its participants and beneficiaries, and protective of the rights of participants and beneficiaries of the plan;

(3) The proposed exemptions, if granted, will be supplemental to, and not in derogation of, any other provisions of the Act and/or the Code, including statutory or administrative exemptions and transitional rules. Furthermore, the fact that a transaction is subject to an administrative or statutory exemption is not dispositive of whether the transaction is in fact a prohibited transaction; and

(4) The proposed exemptions, if granted, will be subject to the express condition that the material facts and representations contained in each application are true and complete, and that each application accurately describes all material terms of the transaction which is the subject of the exemption.

Signed at Washington, DC, this 25th day of May, 2007.

Ivan Strasfeld,

*Director of Exemption Determinations,
Employee Benefits Security Administration,
U.S. Department Of Labor.*

[FR Doc. E7-10488 Filed 5-31-07; 8:45 am]

BILLING CODE 4510-29-P

DEPARTMENT OF LABOR

Proposed Collection for Data Validation Requirement for Employment and Training Programs; Comment Request

AGENCY: Employment and Training Administration (ETA), Labor.

ACTION: Notice.

SUMMARY: The Department of Labor, as part of its continuing effort to reduce paperwork and respondent burden conducts a preclearance consultation program to provide the general public and Federal agencies with an opportunity to comment on proposed

and/or continuing collections of information in accordance with the Paperwork Reduction Act of 1995 (PRA95) (44 U.S.C. 3506(c)(2)(A)). This program helps to ensure that requested data can be provided in the desired format, reporting burden (time and financial resources) is minimized, collection instruments are clearly understood, and the impact of collection requirements on respondents can be properly assessed. Currently, the Employment and Training Administration (ETA) is soliciting comments concerning a revision of a data validation requirement for the following employment and training programs: Workforce Investment Act (WIA) Title IB, Wagner-Peyser, Trade Adjustment Assistance (TAA), National Farmworker Jobs (NFJP), Indian and Native American Employment and Training, and Senior Community Service Employment (SCSEP).

A copy of the proposed information collection request (ICR) can be obtained by contacting the office listed below in the addresses section of this notice or by accessing: <http://www.doleta.gov/OMB/OMBControlNumber.cfm>.

DATES: Written comments must be submitted to the office listed in the addressee's section below on or before July 31, 2007.

ADDRESSES: Submit written comments to the U.S. Department of Labor, Employment and Training Administration, Office of Performance and Technology, 200 Constitution Avenue, NW., Room S-5206, Washington, DC 20210, Attention: Karen A. Staha, Director, Division of System Accomplishments. Telephone number: (202) 693-3031 (this is not a toll-free number). Fax: (202) 693-3490. E-mail: Staha.Karen@dol.gov.

FOR FURTHER INFORMATION CONTACT: Traci DiMartini, Office of Performance and Technology, Employment and Training Administration, U.S. Department of Labor, 200 Constitution Avenue, NW., Room S-5206, Washington, DC 20210; telephone: (202) 693-3698 (this is not a toll-free number); fax: (202) 693-3490; e-mail: Dimartini.Traci@dol.gov.

SUPPLEMENTARY INFORMATION:

I. Background

The accuracy and reliability of program reports submitted by states and grantees using Federal funds are fundamental elements of good public administration, and are necessary tools for maintaining and demonstrating system integrity. The President's Management Agenda to improve the management and performance of the

Federal government has emphasized the importance of complete information for program monitoring and improving program results. States and grantees receiving funding under WIA Title IB, Wagner-Peyser Act, TAA, and the Older Americans Act (i.e., SCSEP) are required to maintain and report accurate program and financial information (WIA section 185 (29 U.S.C. 2935) and WIA Regulations 20 CFR 667.300(e)(2), Wagner-Peyser Act section 10 (29 U.S.C. 49i), Older Americans Act section 503(f)(3) and (4) (42 U.S.C. 3056a(f)(3) and (4)), and TAA regulations 20 CFR 617.57). Further, all states and grantees receiving funding from ETA and the Veterans' Employment and Training Service are required to submit reports or participant records and attest to the accuracy of these reports and records.

Performance audits conducted by the Department of Labor's Office of Inspector General, however, found that the accuracy of reported performance outcomes could not be assured due to insufficient local, state, and Federal oversight. To address this concern and meet the Agency's goal for accurate and reliable data, ETA implemented a data validation process in order to ensure the accuracy of data collected and reported on program activities and outcomes.

Data Validation. The data validation requirement for employment and training programs strengthens the workforce system by ensuring that accurate and reliable information on program activities and outcomes is available. Data validation is intended to accomplish the following goals:

- Ensure that critical performance data are accurate.
- Detect and identify specific problems with a state's or grantee's reporting process, including software and data issues, to enable the state or grantee to correct the problems.
- Help states and grantees analyze the causes of performance successes and failures by displaying participant data organized by performance outcomes. In addition, the process allows states and grantees to select appropriate validation samples necessary to compute statistically significant error rates.

Data validation consists of two parts:

1. Report validation evaluates the validity of aggregate reports submitted to ETA by checking the accuracy of the reporting software used to calculate the reports. Report validation is conducted by processing a complete file of participant records into validation counts and comparing the validation counts to those reported by the state or grantee.
2. Data element validation assesses the accuracy of participant data records.

Data element validation is conducted by reviewing samples of participant records against source documentation to ensure compliance with Federal definitions.

Data Validation Background. WIA Title IB, Wagner-Peyser, and TAA program staff have been conducting data validation for three years. The states received training prior to beginning validation and receive ongoing training and technical assistance from ETA throughout the validation process. NFJP grantees have been conducting data validation for two years, and have received ongoing training and technical assistance during this period. SCSEP grantees will begin data validation by the end of Calendar Year (CY) 2007. Indian and Native American program grantees will pilot validation by 2008.

Resources. The requirement to perform validation derives from states' and grantees' responsibility to provide accurate information on program activities and outcomes to ETA. States and grantees are expected to provide resources for conducting validation from their administrative funds. Validation of program performance is a basic responsibility of grantees, who are required to report on program performance, in accordance with statutory provisions and Department of Labor regulations (29 CFR 95.51 and 97.40). ETA has taken a number of steps to minimize the resources needed for data validation, including developing tools that states and grantees can use to conduct validation. The estimates provided below indicate that annual staff requirements for a state to continue data validation operations for WIA Title IB, Wagner-Peyser, and TAA programs will be on average 792 hours each year (or less than 1/2 of a staff year) for all three programs combined. For the NFJP, Indian and Native American program, and SCSEP grantees, the annual staff requirements will be on average 103 hours (or about 1/20 of a staff year) for each grant.

Data Validation Tools. To reduce the startup costs of implementing data validation, there are standardized software and user handbooks that states and grantees can use to conduct data validation. Software and handbooks have already been developed for the state programs and the NFJP, and will be developed for the Indian and Native American program and the SCSEP.

- Software generates samples, worksheets, and reports on data accuracy. For report validation, the software validates the accuracy of aggregate reports that are generated by the state's or grantee's reporting software and produces an error rate for

each reported count. For data element validation, the software generates a sample of the participant records and data elements for the state or grantee to validate. The software produces worksheets on which the validator records information after checking the source documentation in the sampled case files. The software calculates error rates for each data element, with confidence intervals of 3.5 percent for large states/grantees and 4 percent for small states/grantees.

- User handbooks provide detailed information on software installation, building and importing a validation file, and completing report and data element validation. The handbooks also explain the validation methodology, including sampling specifications and data element validation instructions for each data element to be validated.

Data Recording and Reports. States and grantees submit their validation results electronically to ETA in the same manner as other reports. The results are stored in a data base in ETA's headquarters in Washington, DC, and compiled in an annual validation accuracy report.

Training and Technical Assistance. ETA has provided validation training and technical assistance to states in regional sessions on an ongoing basis since the summer of 2003. Technical assistance has also been provided on an ongoing basis to the NFJP grantees. Training for the SCSEP will take place in CY 2007. Indian and Native American program grantees will receive training prior to implementation. States and grantees may obtain technical assistance on validation procedures and the use of the validation tools by contacting ETA's Office of Performance and Technology.

Revisions have been made for two reasons. First, for the initial information collection request, ETA combined the burden estimates for all the programs since all would be incurring start-up burden. This time, ETA has disaggregated the estimates for each program to distinguish those that are just beginning to implement data validation and have yet to incur a startup burden, from those that have already implemented data validation and will incur no new start-up burden when the information collection is extended.

Second, some of the data elements to be validated have been revised to reflect the changes made to specific program reporting requirements and the definitions of the performance measures. These changes include: The addition of WIA Title IB validation requirements for the National

Emergency Grants (NEG) and older youth funding streams; the deletion of data elements from the WIA Title IB adult, dislocated worker, and younger youth program validation requirements; and the deletion of data elements from the TAA validation requirements. The new data element requirements are documented in the programs' data validation user handbooks.

II. Review Focus

The Department of Labor is particularly interested in comments which:

- Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;
- Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- Enhance the quality, utility, and clarity of the information to be collected; and
- Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses.

III. Current Actions

Type of Review: Revision of Approved Collection.

Agency: Employment and Training Administration.

Title: Data Validation Requirement for Employment and Training Programs

OMB Number: 1205-0448.

Recordkeeping: States and grantees must maintain complete records of all validation activities for three years. The retention requirement will apply to records of all validation activities, including files, worksheets, reports, and source documentation.

Affected Public: State, local and tribal government entities and private non-profit organizations.

Total Respondents: 318 (53 states and 265 grantees).

Frequency: Complete data validation annually.

Total Responses: 424 (3 responses each for the 53 states and 1 response for each of the 265 grantees).

Average Annual Time per Respondent: 792 hours for states' validations for WIA Title IB, Wagner-Peyser, and TAA combined, and 103 hours per grantee for the NFJP, Indian

and Native American program, and the SCSEP.

Total Annual Burden Hours: 41,970 for all 53 states plus 27,361 for all 265 grantees when fully implemented.

Average Annual Cost per Respondent/ Total Burden Cost (operating/ maintaining): \$25,736 on average per state and \$1,364,025 per year for all states to complete validation for the WIA Title IB, Wagner-Peyser, and TAA programs. The estimated annual cost of conducting validation for the NFJP, Indian and Native American program, and the SCSEP grantees is \$1,960 on average per grantee and \$519,301 total.

Total Burden Hours (start-up): There is no startup burden for WIA Title IB, Wagner-Peyser, and TAA programs because this was incurred when data validation was first implemented three years ago. NFJP grantees have been conducting data validation for two years and have received ongoing training and technical assistance during this period. SCSEP grantees will begin data validation by the end of CY 2007. Indian and Native American program grantees will pilot validation by 2008. Startup activities for the Indian and Native American program and SCSEP will require an additional 75 hours on average per grantee in the initial year of validation for a total of 16,072 start-up burden hours.

Total Burden Cost (start-up): \$1,311 for each of the 74 SCSEP grants and \$847 for each of the 141 Indian and Native American program grantee for 281,931 combined for the 215 grantees in the initial year of validation for both the Indian and Native American program and the SCSEP, and \$0 for NFJP and the WIA Title IB, Wagner-Peyser, and TAA programs.

Data validation, when fully implemented, is estimated to require an annual burden of 69,331 hours and \$1,883,326 for operating all six programs subject to the validation requirement. And as stated earlier, an additional 16,072 hours and \$281,931 in start-up burden in the initial year of validation is estimated for the Indian and Native American and SCSEP grantees. These estimates represent a significant decrease in costs and a slight increase in hours from the current OMB inventory for ETA data validation. The change is attributable to three factors:

- The elimination of start-up costs for WIA, Wagner-Peyser, and TAA programs, and the NFJP validation;
- Updates in the number of grantees required to conduct data validation; and
- Updates to the hourly cost of conducting data validation for grantee staff.

Comments submitted in response to this comment request will be summarized and/or included in the request for Office of Management and Budget approval of the information collection request; they will also become a matter of public record.

Dated: May 21, 2007.

John R. Beverly, III,

Administrator, Office of Performance and Technology.

[FR Doc. E7-10558 Filed 5-31-07; 8:45 am]

BILLING CODE 4510-FN-P

LIBRARY OF CONGRESS

Copyright Office

Soliciting Participation in Electronic Copyright Office (eCO) Beta Test

AGENCY: Copyright Office, Library of Congress.

ACTION: Public notice.

SUMMARY: In July 2007, the Copyright Office will initiate a beta testing phase in the development of its automated registration system, electronic Copyright Office (eCO). Requests to participate in eCO beta testing are being accepted from the public at this time. Participants will be selected in the order that requests are received and based on an array of submission criteria, and basic registration claims will be accepted at a reduced rate established for electronic filings.

DATES: Requests for participation in the beta test of the Copyright Office's online registration system are being accepted through the Office's Web site beginning June 1, 2007.

ADDRESSES: Requests to participate in the beta test of the Copyright Office's electronic online registration system may be filed through the Office's Web site at: <http://www.copyright.gov/eco/beta-request.html>.

FOR FURTHER INFORMATION CONTACT:

David Christopher, Special Assistant to the Register of Copyrights, Office of the Register, P.O. Box 70977, Southwest Station, Washington, DC 20024-0977. Telephone: (202) 707-8825. Telefax: (202) 707-8366.

SUPPLEMENTARY INFORMATION:

Background

The Copyright Office is a service unit within the Library of Congress. The mission of the Copyright Office is to promote creativity by administering and sustaining an effective national copyright system that relies on the collection, processing, storage and dissemination of information to fulfill

its duties under title 17 of the United States Code and title 37 of the Code of Federal Regulations. Congress enacted the first federal copyright law in 1790 and it has been revised periodically over the years.

In 1870 Congress established a national copyright function in the Library of Congress and required that all works be deposited and registered in this single location. The registration and deposit of works under copyright protection serves two important purposes: to create a public record of copyright registration and to enrich the collections of the Library of Congress for the benefit of the American people. The Copyright Office administers the copyright law by registering claims to copyright, recording legal documents relating to copyright ownership (i.e., recordation), acquiring copyrighted works for deposit in the collections of the Library of Congress, and handling administrative provisions of statutory licenses and obligations. The Copyright Office provides authoritative advice on copyright to the Congress and the Executive Branch, and the judiciary, and serves as a resource to the domestic and international communities. The Office responds to public requests for information and engages in outreach programs to contribute to the public discussion of copyright issues.

Processing systems

The Copyright Office has operated in essentially the same manner for many years and is primarily a paper-based operation. Most remitters submit paper applications for copyright registration and paper documents for recordation. Correspondence is also produced primarily on paper and stored in paper files. Works submitted for registration are often bulky and contain multiple items. Currently, materials submitted for registration move through several different divisions without the benefit of tracking systems to identify the location of each individual work during its processing.

The Copyright Office has six principal office-wide systems that are used for workflow management: fee processing, correspondence tracking, imaging, statutory license information, historical copyright information, and electronic receipts. There are some automated interfaces between the systems, but the systems are not integrated with each other or with other related Library of Congress processes. Numerous small PC-based systems have also been developed to track many transactions that the larger systems were not designed to support. Some systems rely