

**MEMORANDUM TO REVIEWER REGARDING ANTICIPATED REVISION TO
FORM LM-30 and ISSUANCE OF FORM T-1
OMB No. 1215-0188**

This information collection does not include forthcoming final rules revising Form LM-30, Labor Organization Officer and Employee Report, and issuing Form T-1, Trust Annual Report, which will change the associated burden estimates. The final rules for Forms LM-30 and T-1 will be separately submitted to OMB for information collection approval.

Form LM-30, Labor Organization Officer and Employee Report

On August 19, 2005, a Notice of Proposed Rulemaking was published in the Federal Register proposing changes to Form LM-30, which is used by officers and employees of labor organizations subject to the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA or Act). Section 202 of the Act requires public disclosure of certain financial interests held, income received, and transactions engaged in by labor organization officers and employees and their spouses and minor children.

By the close of the comment period, OLMS received approximately 1,014 comments. OLMS has reviewed the comments and is in the process of developing the final rule, including determining the anticipated reporting and recordkeeping burden. OLMS will submit the final rule and associated information collection burden estimates to OMB under separate cover.

Form T-1, Trust Annual Report

In December 2002, the Department proposed to substantially revise Form LM-2, Labor Organization Annual Report, which is filed by the largest labor organizations. The proposed rule also included a new Form T-1 to be filed by Form LM-2 filers to report on trusts in which the union held an interest. The Department received over 35,000 comments. After consideration of the comments, the Department issued its new union financial reporting rule on October 9, 2003.

In November 2003, the AFL-CIO filed a complaint against the Department, challenging the rule. The rule was upheld on its merits by the district court, but on appeal the Court of Appeals for the District of Columbia Circuit vacated the rule relating to Form T-1. In light of the decision by the D.C. Circuit and guided by its opinion, the Department has again reviewed the proposal as it related to the Form T-1 and the comments received on the proposal. The forthcoming final Form T-1 rule is based on that review.

OLMS previously submitted to, and received approval from, OMB for the projected reporting and recordkeeping burdens associated with Form T-1. As Form T-1 is currently not in use, it is not submitted for continuing approval. OLMS is in the process of preparing the final rule, including determining the anticipated reporting and recordkeeping burden stemming from the final rule. It is anticipated that, as the requirements of the Form T-1 have been narrowed, the reporting and recordkeeping burden will be less than the burden previously approved. OLMS will submit the final rule and associated information collection burden estimates to OMB under separate cover.