

**Supporting Statement for OMB Clearance of the  
ETA 191 Statement of Expenditures and Financial Adjustments of Federal Funds for  
Unemployment Compensation for  
Federal Employees and Ex-Servicemembers (UCFE/UCX), OMB Control No. 1205-0162**

**A. Justification**

1. Reasons for Data Collection. Public Law 97-362, Miscellaneous Revenue Act of 1982 amended the UCX law (5 U.S.C. 8509) and Public Law 96-499, Omnibus Reconciliation Act, Amended the UCFE law (5 U.S.C. 8501, et. Seq.) and requires each Federal employing agency to pay the costs of regular and extended UCFE/UCX benefits paid to its employees by the State Workforce Agencies (SWAs).

By submittal of Form ETA 191 each quarter, SWAs will show the amount of benefits that should be charged to each Federal employing agency. ETA will aggregate the quarterly charges reported on the Form ETA 191 and submit on official bill (showing all States' charges) to each Federal agency that is being charged. Federal agencies will reimburse the Federal Employees Compensation (FEC) Account, maintained by the U.S. Treasury. This collection is authorized by the Social Security Act, Section 303 (a) (6).

2. Users, Purposes, and Consequences of Failure to Collect the Information. This report is used by ETA to bill Federal and military agencies for costs incurred by SWAs in paying unemployment insurance benefits to the employees of these agencies. Each SWAs reports to ETA benefit charges by Federal/military agencies. These charges are aggregated for each agency and billed to the individual agencies. Without this data, ETA could not bill these agencies separately as required in the laws cited in statement # 1. If ETA were unable to bill these Federal and military agencies, such agencies would be unable to reimburse the FEC Account. This would further result in the account not having available resources to cover UCFE and UCX benefit payments.
3. Consideration of Information Technology. The ETA 191 is currently transmitted electronically from the state level to the National Office.
4. Describe Efforts to Identify Duplication. This information is not available elsewhere.
5. Collection of Information Involving Small Business. Collection does not involve small business or other small entities.
6. Consequences of less frequent collection. This collection is quarterly. Less frequent reports will result in less frequent reimbursements to the FEC Account which may result in insufficient funds being available to pay unemployment benefits to Federal claimants and Ex-Servicemembers.
7. Special Circumstances Involved in Collection of Data. Collection is consistent with 5 CFR 1320.5 (d) (2).

8. Consultation outside the Agency. A pre-clearance notice about this extension request was published for public comment in the Federal Register on March 31, 2009 (Vol. 74, p 14579). In addition, states were advised through the ETA website of the notice and opportunity to comment. No comments were received.
9. Payment or Gift to Respondents. There is no remuneration to respondents other than the usual payment to states to operate the program.
10. Assurance of Confidentiality. There is no assurance of confidentiality.
11. Questions of a Sensitive Nature. There are no questions of a sensitive nature.
12. Respondents' Burden. The average estimated response time for a single report is 6 hours. The report is submitted by 53 state workforce agencies at a quarterly frequency. We estimate the aggregate burden to be:  
  
 $(53 \text{ respondents}) \times (4 \text{ reports/year}) \times (6 \text{ hours per report}) = 1,272 \text{ burden hours.}$   
  
The OMB burden disclosure statement currently appears on the ETA 191. The Federal government pays the salaries of the state staff which, at \$39.17 per hour, produces an estimated cost is \$49,824. This figure is based on the FY 2009 average salary for SWA staff. However, the Federal government pays the salaries of the state staff, so there is no direct cost to the state
13. Startup Costs. There are no other costs than those described in 12 above.
14. Federal Costs. The ETA 191 data is submitted electronically by states and stored on Department of Labor computer systems along with many other reports. There are no direct additional Federal Costs in processing this report
15. Changes in Burden. There is no change in burden.
16. Publication information. This information is not published.
17. Display of OMB Expiration Date. ETA will display the OMB control number and expiration date on the ETA 191. In addition, a listing of current OMB control numbers and expiration dates are displayed within the online reporting system.

## **B. Collection of Information Employing Statistical Methods.**

Statistical methods are not used in the collection of ETA 191 information.