

SUPPORTING STATEMENT FOR OMB Control No. 1205-0177:
ETA 218, Benefit Rights and Experience

A. Justification

1. Circumstances Making the Collection Necessary. In order for an individual to be eligible for a State unemployment compensation program, he/she must meet certain requirements which demonstrate attachment to the labor force. Past wages are used in the vast majority of States for this purpose but a few States use actual weeks of work. Information relative to this first test of eligibility, known as monetary eligibility, is reported on the ETA 218 report. The data in the ETA 218 report includes numbers of individuals who were and were not monetarily eligible, those eligible for the maximum benefits, those eligible classified by potential duration categories, and exhaustees classified by actual duration categories. Authority for collection of this information is under Section 303(a)(6) of the Social Security Act.
2. How, by Whom, Frequency and Purpose of Collection. Data for this report is a by-product of operating the program. It is transmitted electronically to the National Office quarterly. This data is used by the National Office in solvency studies, cost estimating and modeling, and to assess State benefit formulas. If this data were not available, cost estimating and modeling would be less accurate.
3. Information Technology. This report is highly computerized in most States. States are free to use any technology available to reduce reporting burden. Further, the ETA 218 is reported electronically to the National Office with States having the option of directly downloading data from their computer to the computer which transmits the report thus eliminating any keying.
4. Duplication. No other similar information is available.
5. Small Businesses. This collection does not involve small business or other small entities.
6. Less Frequent Collection. This is a quarterly report. If it were collected less frequently, there would be fewer data points on which to project short term trends. Our allocation system is quarterly so it is

desirable to project workload and related information at least on a quarterly basis.

7. 5 CFR 1320.5. This collection is consistent with the guidelines in 5 CFR 1320.5.
8. Consultation. In accordance with the Paperwork Reduction Act of 1995, the public was allowed 60 days to review and comment on January 25, 2010, when the Notice was published in the *Federal Register* (Vol. 75, No. 15, page 3927 et seq). No comments were received.
9. Payments/Gifts. There are no payments to respondents.
10. Confidentiality. There is no assurance of confidentiality.
11. Sensitive Questions. The collection does not involve questions of a sensitive nature.
12. Burden. Respondents are the 53 SWAs. We estimate, on average, the burden for this report is estimated at 106 hours per year for the regular report and 2 hours for extended benefits (EB) activity.

<u>Number of Respondents</u>	<u>Annual Reports</u>	<u>Annual Responses</u>	<u>Hrs/Report</u>	<u>Total</u>
Regular 53	4	212	.5	106
EB 2	2	4	.5	<u>2</u>
				108

The cost of assembling the reports is estimated to be \$3,863 per year. This estimate is arrived at by multiplying the annual burden hours by the FY 2009 average hourly wage for state workforce agency staff as follows:

$$108 \text{ hours} \times \$35.77 = \$3,863.$$

However, the federal government pays the salaries of the state staff, so there is no direct cost to the state.

13. Respondent Cost. There are no other costs involved other than mentioned in item 12.
14. Annualized Federal Costs. This on-going data collection is part of a much larger computerized system and Federal costs for any one report cannot be broken out.
15. Reason for Change. There are no changes to burden.

16. Publication. Data from this report is published in the annual ET Handbook 394, Unemployment Insurance Financial Data.

17. Display of Expiration Date. ETA displays the OMB control number and expiration date on the ETA 218 hard copy form as well on electronic input form. A menu option has also been incorporated into the UI electronic reporting system which provides access to a complete listing of OMB control numbers and expiration dates for all required reports, including the ETA 218.

18. Exception to the Certification Statement. There are no exceptions.

B. Collections of Information Employing Statistical Methods.

This collection does not involve statistical method.