

**Justification for Non-substantive Changes
to ETA-902 (OMB control number 1205-0051)**

The U.S. Department of Labor (USDOL) currently collects data for the Disaster Unemployment Assistance (DUA) program on the ETA 902 (OMB 1205-0051). The current program is a joint effort of FEMA and the USDOL, and the reporting describes state activities for approved disaster declarations.

The recent oil spill disaster in the Gulf of Mexico has produced a difficult situation in that there are jobless claims as a result of the spill, and a great desire to collect data describing the extent of the impacts. However, the lack of a federal disaster declaration has precluded the use of the DUA and the existing ETA 902. Due to both administration and public demand for data describing the impact of the gulf oil spill, it is important that we deploy a modified ETA 902 collection instrument for disasters related to oil spills, but which do not qualify for the existing DUA.

The attached form, ETA 902-A, serves this purpose. The key difference between the existing Disaster Unemployment Assistance ETA 902 and the proposed Oil Spill Disaster ETA 902-A is that it contains fewer cells. There is no need to collect information on disaster declarations, or to subcategorize activity by the type of claimant or agent filed against. The cell definitions are unchanged so ETA 902-A is best thought of as a minimalist ETA 902 that provides only those data elements necessary to describe unemployment resulting from oil spill disruptions.

This is not a new reporting form; rather, it is a well known and established instrument that is clearly understood. The burden ascribed to ETA 902-A is minimal as we are requiring only that a subset of cells from ETA 902 be completed. Finally, as oil spills are relatively rare events, the chance that a state will need to submit this report for future such events is very small.

Burden on Respondents. Given that oil spill disasters are relatively rare events, we estimate that for most years, the burden on respondents should be negligible. However, for this application, we are expecting that five states (FL, AL, MS, LA and TX) would be subject to reporting in the next few months. As a result, we would estimate the added burden to be as follows:

5 states reporting monthly (beginning with October) through the end of 2010 for a total of 15 reports at a reporting burden of 30 minutes per report = 7.5 hours.