

**SUPPORTING STATEMENT FOR THE  
PAPERWORK REDUCTION ACT SUBMISSION TO RENEW THE  
ETA 207, NONMONETARY DETERMINATION ACTIVITIES REPORT**

**A. Justification**

**1. Circumstances that Make the Collection Necessary.**

Claimants for unemployment insurance may be denied their benefits for reasons associated with their separation from employment, such as voluntary quit, or questions of continuing eligibility, such as refusal of suitable work. This data is a byproduct of the normal program operations. The ETA 207 report contains state data on the number and types of issues that arise and on the denials of benefits that may result.

These data are used by the Office of Unemployment Insurance (OUI) to determine workload counts, to enable the OUI to evaluate the adequacy and effectiveness of adjudication determination procedures, and to evaluate the impact of state and Federal legislation with respect to disqualifications. The data are also used for general statistical purposes. No similar data are available from other sources.

This collection is authorized under the Social Security Act, Section 303(a)(6).

**2. Use of the Information.** As stated in 1, some of this data is used as workload counts which are an input for funding states for administrative costs. Comparative figures among states give the National Office information about the effectiveness of the various state provisions and or administrative procedures in carrying out the program. Combined with information from the ETA 5130 (OMB No. 1205-0172) and the ETA 227 (OMB No. 1205-0173), individual state programs and legal provisions can be evaluated as to effectiveness.

Without this information the National Office would not be able to evaluate state performance in the adjudication area on an ongoing basis and it would not have one of the key inputs to the administrative funding process.

3. **Use of Improved Technology.** As with most UI reports, the ETA 207 is a part of an electronic reporting system through which State Workforce Agencies enter and transmit data to the National Office. States have the option of creating a file on their own computer system and uploading it to the UI system to eliminate hand keying and the potential for errors that go along with it. Reduction of burden through increased automation is always encouraged and supported.
4. **Duplication.** There is no other source for this information.
5. **Small Business.** This collection does not involve small business.
6. **Less Frequent Collection.** Less frequently than a quarterly collection would mean less ability to track impact of legislation and less ability to track patterns of activity within a state over time.
7. **5 CFR 1320.6.** Collection is consistent with 5 CFR 1320.6.
8. **Consultation.** National Office program staff are routinely in touch with Regional staff who work with state staff through phone calls, visits and conferences. National Office staff are also available to state staff. Additionally, in accordance with the Paperwork Reduction Act of 1995, a notice was published in the *Federal Register* on September 2, 2010 (Vol. 75, p. 53982) and the public was allowed 60 days to review and comment on this information collection request. No comments were received.
9. **Payment to Respondents.** There were no payments or gifts to any respondents.
10. **Confidentiality.** There are no assurances of confidentiality.
11. **Sensitive Questions.** There are no questions of a sensitive nature.
12. **Burden.** The estimated annual burden for this collection is 2,544 hours (848 hours for the ETA 207 Regular report

and 48 hours for the ETA 207 Extended Benefits report).

| Program Type           | Respondents | Hours per response | Reporting Frequency | Estimated Annual Burden Hours |
|------------------------|-------------|--------------------|---------------------|-------------------------------|
| Regular                | 53          | 4                  | 4                   | 848h                          |
| EB (Extended Benefits) | 53          | 4                  | 4                   | 848h                          |
| EUC 2008               | 53          | 4                  | 4                   | 848h                          |
| Total                  |             |                    |                     | 2,544h                        |

The cost of assembling the reports is estimated to be \$32,050 per year. This estimate is arrived at by multiplying the annual burden hours by the FY 2011 average hourly wage for state workforce agency staff as follows: 896 hours x \$40.81 per hour = 36565.76, however, the Federal government pays the salaries of the state staff via administrative funds, so there is no direct cost to the states.

13. **Startup Costs.** There are no startup costs. All reports are collected and electronically transmitted.
14. **Federal Costs.** Cost to the Federal government cannot be estimated. This information is generally data entered by the states and electronically transmitted to the National Office computer, along with many other reports, where it is immediately available for use.
15. **Changes in Burden.** There is no change in the estimated burden necessary to file individual reports, only in the expected number of reports. Because states produce the data for reports largely from existing reporting software and transmit that information to USDOL through government provided and mediated computer and software systems, the actual burden involved in reporting is not considerable. The reason for the change in burden is that, due to economic circumstances, ETA now operates three tiers of benefits (regular, Federal-State extended benefits (EB), and the Federal Emergency Unemployment Compensation (EUC08)), each of which requires an ETA 207 report. While it's unlikely

that economic circumstances will require 636 submissions from each respondent for EB and EUC08 reports, uncertainty over future economic conditions and congressional action in extending or expanding benefits has led to the conservative assumption that states may have activity to report for a good portion of the next three years.

16. **Publication.** This data is not routinely published.

17. **Request to not display OMB number.** The OMB Control Number and expiration date are displayed on the form associated with this information collection.

18. **Exceptions.** There are no exceptions.

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

This request does not employ a statistical methodology.