

## NOTE TO REVIEWER

### **Proposal to Merge the Employment and Training Administration (ETA) 227 (OMB 1205-0173, expires 12/31/2012) and the ETA 9000 (OMB 1205-0187, expires 06/30/2011) into a Single Report**

The Office of Unemployment Insurance (OUI) is combining two separate data collections into one single data collection. These are: The ETA 9000 report, *Internal Fraud Activities*, (OMB control no. 1205-0187) and the ETA 227 report, *Overpayment Detection and Recovery Activities* (OMB control no. 1205-0173). These two reports are collections of state data regarding detection and recovery of unemployment insurance (UI) fraud and overpayments. The data collected and objectives for these reports are similar, both collections reflect details concerning cases detected and investigated that resulted in overpayments and/or fraud.

Because the ETA 227 is the more complicated of the two reports and is submitted quarterly, OUI is retaining Form 227 as the resulting data instrument for this merge and discontinuing the ETA 9000.

The ETA 227 report describes overpayments on UI claims that result from claimant, employer, and/or agency errors. It is used in the calculation of state performance measures. This report has five sections applicable to all states including causes of overpayments, detection methods, reconciliation and recovery of overpayments, criminal and civil actions taken, and the aging of benefit overpayment accounts.

The ETA 9000 is considerably less complicated and is submitted annually. Overpayments that result on UI claims due to employee fraud and/or abuse are reported. Over the many years that ETA 9000 has been required, however, very few cases have been detected and reported. Analysis of the data collected on the ETA 9000 has revealed that only some of the data is useful. OUI will retain the reported data elements from the ETA 9000 that indicate cases of benefits overpaid, for example, due to collusion between agency staff and a claimant, and any resulting prosecution of those involved are important data fields that OUI is merging into the consolidated ETA 227.

OUI will consolidate these two data collection reports into a single report by adding three data elements of those currently collected on the ETA 9000 report, to the ETA 227 report.

This consolidation/change is not expected to add to the burden hours for respondents other than a one-time burden for programming the modifications to the ETA 227 report. The current burden for the ETA 9000 is three hours per annual submittal. The consolidated ETA 227 will continue to be collected on a quarterly basis and will reflect the current burden of the ETA 227. Added to this will be one hour per submittal, reflecting the estimated burden for the ETA 9000.

As a result of this consolidation, new, important information will be collected on a quarterly basis, the states have one fewer report to submit to the Department, and the data from the ETA 9000 that ETA has determined not to be useful is being dropped.