

What you propose works for me. In some cases our programs will take a one-year hit and then come in with a change request in out years; however, your approach involves the fewest transactions. I concur with the change.

Thanks,

Michel Smyth
U.S. Department of Labor
Office of the Assistant Secretary for
Administration and Management-OCIO

(202) 693-4129 (Office)
(202) 641-7848 (Cell)

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From: Borson, Joseph (Volunteer) [mailto:Joseph_E_Borson@omb.eop.gov]
Sent: Monday, July 18, 2011 9:54 AM
To: Smyth, Michel - OASAM ITC
Subject: RE: _passback_Supporting Statement - Internal Fraud Activities 1205-0187

Hi Michel,

I suppose I could have just mentioned this when we were speaking; but for this submission there are 1060 hours of "startup/conversion" costs from moving to the new form. However, in ROCIS, it looks like these numbers are added to the 3,180 annual burden hours for each year, rather than being averaged across the three-year approval period. I believe the ROCIS burden should be 3533 hours, not 4240. If that makes sense on your end, I can make the change myself, and finish up here.

Thanks!

Joey

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Joey Borson | JBorson@omb.eop.gov | (202) 395-3585

From: Borson, Joseph (Volunteer)
Sent: Thursday, July 07, 2011 9:35 AM
To: Smyth, Michel - OASAM ITC
Subject: RE: _passback_Supporting Statement - Internal Fraud Activities 1205-0187

Hi Michel,

Thanks for clarifying - this makes perfect sense now. I believe the confusion stems from the fact that I was assuming the "previous collection" was ETA-227, not control number 1205-0187.

Thanks for closing the loop – I should be able to sign off once the track changes duplicate is removed.

Joey

From: Smyth, Michel - OASAM ITC [<mailto:Smyth.Michel@dol.gov>]
Sent: Thursday, July 07, 2011 9:18 AM
To: Borson, Joseph (Volunteer)
Subject: FW: _passback_Supporting Statement - Internal Fraud Activities 1205-0187
Importance: High

Good morning: The electronic responses rate has been updated to 100 percent.

ETA informs me, and I concur, that the burden hours are in the correct places in ROCIS. By way of clarification, Form ETA-9000 is being combined with Form ETA-227 (currently cleared under Control Number 1205-0173). As a number, Form ETA-227 will be the survivor and 1205-0187 will be the survivor Control Number. Most of the burden is associated with the existing ETA-227, so that burden is added into this collection. (As ETA points out in the revised supporting statement, because the 1205-0187 collection expired first, ETA had to set the timing for now.) You may want to look at Supporting Statement items 12 and 15, to which ETA added narrative to address the issue. The 1205-0173 Control Number and ETA-9000 Form Number will be discontinued after OMB issues the NOA for 1205-0187.

We have a request in to OMB to remove a “duplicate” version of the supporting statement that includes track changes; however, I also want to close the loop with you.

Michel Smyth
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From: Watts-Thomas, Linda - OASAM
Sent: Thursday, June 16, 2011 4:23 PM
To: Naradzay, Bonnie - ETA
Cc: Smyth, Michel - OASAM ITC
Subject: FW: _passback_Supporting Statement - Internal Fraud Activities - 201103-1205-011 3).doc

Hi Bonnie,

Joey sent a few more things to do for this ICR.

Linda

From: Borson, Joseph (Volunteer) [mailto:Joseph_E_Borson@omb.eop.gov]
Sent: Thursday, June 16, 2011 4:15 PM
To: Watts-Thomas, Linda - OASAM
Cc: Dooling, Bridget C.E.
Subject: RE: _passback_Supporting Statement - Internal Fraud Activities - 201103-1205-0113).doc

Hi Linda,

Thanks for coordinating the passback, I really appreciate all your help.

The comments are very helpful, and please ask ETA if they can incorporate the "comment box" responses into the body of the document and re-upload.

Two final questions for the ROCIS form.

First, if all submissions are electronic (as they appear to be), would it be proper to state that 100% of submissions are electronic in the relevant text box (not 99% as currently stated). If 99% is more accurate, just add a sentence explaining why.

Second, for the ROCIS form, I understand (and approve) of the combination of the ETA 227 and ETA 9000 forms into the "new" ETA 227. For ROCIS purposes, though, if ETA 227 originally had 14 average hours, and now has 15 average hours, would it be proper to state that the "original" form ETA 227 (acknowledging, of course, that it has changed) was 2,968 hours? This seems to be what the supporting statement implies, but please let me know if I have mischaracterized it. I'm also happy to discuss over the phone if that's easier.

Thanks so much!

Joey