

**Supporting Statement for OMB Clearance of the
ETA 902, Disaster Unemployment Assistance Activities Report
And ETA 902-A, Oil Spill Activity Report**

A. Justification

1. Circumstances That Necessitate Collection.

Public Law 100-707 (Sections 410 and 423 of The Robert T. Stafford Disaster Relief and Emergency Assistance Act [the Stafford Act]) provides for assistance to eligible individuals who are unemployed due to a major disaster. State Workforce Agencies through individual agreements with the Secretary of Labor (Secretary), act as agents of the Federal government in providing Disaster Unemployment Assistance (DUA) to eligible applicants who are unemployed as a direct result of a major disaster.

The ETA 902 is a monthly report submitted by the states on DUA program activities once a disaster is declared by the President.

ETA 902-A is a modified ETA 902 report collection instrument for disasters related to oil spills, but which do not qualify for the existing DUA. The report must be submitted for all months during which oil spill related claims began, and continue for 12 months past the last oil spill related initial claims reported.

ETA 902 is prescribed by the Secretary under 20 CFR 625.8 and 625.9 and is necessary for oversight of the DUA program. Collection for both reports are authorized under Section 303(a)(6) of the SSA.

2. Use of Information Collection.

The ETA 902 report includes information on the number of claimants who filed for DUA, including self employed individuals; number of claimants denied DUA benefits; the amount of benefits paid; the number of appeals filed; and the number of overpayments issued. The report is also used to monitor state agency expenditures and to support requests for additional administrative funds from the Federal Emergency Management Agency (FEMA) within the Department of Homeland Security (DHS), which provides the funds for administration and benefits for the DUA program. A facsimile of this report is included in Attachment B.

ETA 902-A report contains fewer cells and only provides those data elements necessary to describe unemployment resulting from oil spill disruptions. ETA 902-A does not collect information on disaster declarations, or subcategorize activity by the type of claimant or agent filed against. A facsimile of this report is included in Attachment B.

The data from these reports allows OUI to do comparative analyses of states' performance and to monitor the impact of the oil spill and properly manage the resulting financial accountability.

If these data were not available, OUI would not have sufficient information to monitor and assess states' performance in administering the DUA program and activities relating to the Oil Spill. Any attempts to identify risks to the program or resolve potential problems would be greatly hindered.

3. Use of Improved Technology.

The states are continually improving program operations and their information handling technologies and, where feasible, new methods are used for taking applications, and

collecting and transmitting the data for these reports. For example, many states have implemented automated remote claims-taking systems, and automated recordkeeping. Reduction of burden through increased automation is always encouraged and supported. As with most unemployment insurance (UI) reports, the ETA 902 report is part of an electronic reporting system through which state UI agencies enter the data on a monthly basis and transmit the data to the ETA National Office.

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.

4. **Description of Effort to Identify Duplication.**

FEMA/DHS has delegated authority to the Department of Labor for the DUA program. Neither FEMA nor any other agency collects information prescribed on the ETA 902 and ETA 902-A report. The data requested are not available from any other source. Therefore, there is no duplication in the information being requested.

5. **Collection of Information Involving Small Business.**

The information collection does not involve small businesses or other small entities.

6. **Consequences of Less Frequent Collection.**

The ETA 902 and ETA 902-A reports are due monthly when a disaster makes submittal of the report necessary. If these data were collected less frequently, ETA's ability to carry out its oversight responsibilities, document disaster impacts, and monitor program effectiveness would be greatly weakened. The funding needs projections would be more unpredictable. Effective accounting of DUA payments and other DUA expenditures would also be hindered. Claimants must certify for DUA on a weekly or bi-weekly basis, which coincides with the frequency required for regular unemployment insurance (UI) benefits. The monthly ETA 902 data collection allows the Department of Labor to assess the overall impact and effectiveness of the DUA program(s) administered by the states.

7. **Special Circumstances.**

There are no special circumstances.

8. **Consultation Outside the Agency.**

As required by 5 CFR 1320.8(d), ETA solicited comments on the proposed extension of approval for the ETA 902, ETA 902-A Report through publication in the Federal Register, (Volume 76, No. 45, Page 12760), March 8, 2011. No comments were received.

9. **Payment/Gifts to Respondents.**

No payment or gift is provided to respondents, other than remuneration of contractors or grantees.

10. **Confidentiality Provided – Respondents.**

The ETA 902 and ETA 902-A report does not identify individuals receiving benefits by name or social security number. Respondents have no expectation of confidentiality.

11. **Sensitive Information.**

There are no items to be completed on the forms which involve sensitive information of a private nature or otherwise.

12. **Estimated Annual Burden Hours.**

On average, there are approximately 50 presidentially declared disasters each year nationwide occurring in about 30 states and about 30 of these disasters include DUA. Approximately 6 ETA 902 monthly activity reports are submitted per disaster (that includes DUA). Estimated average response time for a single report is one (1) hour. There is a final report submitted for each disaster activity, which averages one (1) hour for preparation of the report. Specific breakout of burden hours is as following:

- *Reporting of 902: 30 state disaster declarations x 6 reports per year x 1 hour p/report = 180 hours annually.*
- *Reporting of Final Report: 30 state disaster declarations x 1 Final Reports per year x 1 hour per report = 30 hours annually.*

Total annual estimated burden hours = 210

The current average hourly wage rate of state agency staff was obtained through consultation with staff from OUI Division of Fiscal and Actuarial Services. OUI estimates the average hourly wage rate to be \$40.81 per hour.

210 x \$40.81 per hour = \$8,570.10 (annualized cost).

When the oil spill report within this collection was created, the burden was estimated based on the number of states affected by the deepwater horizon oil spill, not based on any actual reporting. Since the creation of that report, there have been no instances of report submittal. Given that oil spill disasters are very rare events, we estimate that the burden will be negligible.

- *Reporting of 902-A: 1 oil spill disaster x 2 reports per year x 1 hour p/report = 2 hours annually.*

Total annual estimated burden hours = 2

The current average hourly wage rate of state agency staff was obtained through consultation with staff from OUI Division of Fiscal and Actuarial Services. OUI estimates the average hourly wage rate to be \$40.81 per hour.

2 x \$40.81 per hour = \$81.62 (annualized cost).

Total annual time burden: ETA 902 (210 hours) + ETA 902A (2 Hours) = 212 Hours

Total annual cost burden: ETA 902 (\$8,570.10) + ETA 902A (\$81.62) = \$8651.72

13. Estimate of the Total Annual Cost Burden to Respondents.

There are no other costs associated with this collection of information.

14. Estimates of annualized Cost to the Federal Government.

Cost to the Federal government cannot be estimated. DUA program information is generally data entered by the states and electronically transmitted to the ETA National Office computer, along with many other types of reports, where it is immediately available for use.

15. Reasons for Changes in Burden.

There has been a reduction in burden hours. When documenting the burden imposed by this collection previously, ETA mistakenly included overpayments as a separate

burden collection that states submit to OUI. This was incorrect; there are data elements in the 902 report for overpayments but they are not separate or an additional collection to the 902. The burden listed in section 12, above, should represent an accurate estimate of the work associated with meeting the reporting requirements in this collection. In addition, prior documents overestimated burden by overcounting potential respondents on the final report for each state disaster declaration. The reduction in burden reflects a more accurate estimate, with the states providing just one annual report per disaster declaration.

16. **Information of Publication.**

There are no plans to publish the data for statistical use.

17. **Waiver to Display OMB Expiration Date.**

The OMB number and expiration date will be displayed as part of the Handbook instructions for the ETA 902 report.

18. **Exceptions to Certification.**

There are no exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-1.

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

Statistical methods are not used in the collection of the ETA 902 and ETA 902-A information.