Supporting Statement for Paperwork Reduction Act Submission

Information Collection Plan for Benefits.gov Online OMB Control Number 1290-0003 (September 2011)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The purpose of the E-Government Act of 2002 (Pub.L. 107-347, 116 Stat. 2899, 44 U.S.C. § 101, H.R. 2458/S. 803) is to improve the management and promotion of electronic government services and processes by establishing a framework of measures that require using Internet-based information technology to improve citizen access to government information and services, and for other purposes. To this end, the Department of Labor (hereinafter, the "Department") serves as the managing partner of Benefits.gov Online, a federal-wide solution for assisting citizens in identifying and location information on benefits sponsored by the Federal government. This service greatly reduces the burden on citizens attempting to locate benefits available from many different government agencies by providing one-stop access to information on obtaining those benefits.

From time-to time, the precise questions or content may require modification to accommodate additions to the Benefits.gov portal as well as new or revised benefits. As a practical matter, such changes should not be considered material changes to the collection of information but rather as enhancements to Benefits.gov's capacity in mapping users to potential benefits.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

No information is retained by the Department in the current version nor is there any record-keeping requirement. In a decision tree format, respondents answer a series of questions to the extent necessary for locating relevant information on Federal benefits. Responses are used by the respondent to expedite the identification and retrieval of sought after information and resources pertaining to benefits sponsored by the Federal government.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g.,

permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The responses are provided 100% electronically on the Benefits.gov web page, http://www.benefits.gov/

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no duplication. Responses are unique to each respondent's interest or needs. Furthermore, as stated in Item 2 above, no information is retained.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

There is no significant impact on small businesses or other small entities. Furthermore, this service reduces the burden for locating information on benefits sponsored by the Federal and State, and eventually local governments by providing a one-stop automated tool for locating benefits.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The Federal government will be hindered in implementing a key purpose of the E-Government Act of 2002 by not providing a citizen-centered, online, one-stop approach for locating information on government benefits.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - * requiring respondents to report information to the agency more often than quarterly;
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - * requiring respondents to submit more than an original and two copies of any document;
 - requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This information Collection Plan is consistent with guidelines for 5 CFR 1320.5. Therefore, the Department hereby certifies that Benefits.gov does not collect information in any manner as stated above in this Item.

8. If applicable, provide a copy and identify the date and page number of publication in the <u>Federal Register</u> of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Pursuant to the Paperwork Reduction Act of 1995 (PRA) implementing regulations at 5 C.F.R. § 1320.8(d), the Department published a notice in the <u>Federal Register</u> on October 5, 2011 (Vol. 76 FR 61739) announcing its intent to seek extended approval under the PRA. The Department received no comments in response to the notices referenced herein above.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No personally identifiable information is collected; therefore, no assurances of confidentiality are required. However, respondents are provided a link to a privacy statement and terms of use.

Additionally, the Department will comply with all laws and policies pertaining to the use of cookies to facilitate navigation, only session cookies will be utilized.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are asked.

12. Provide estimates of the hour burden of the collection of information.

The Department monitors usage of the Benefits.gov online service through the use of Web Trends®, a web analytics and management tool. By monitoring citizen usage over an entire year, Benefits.gov obtains the number of respondents, frequency of response and time spend in response to calculate burden.

Depending on the level of specificity respondents wish to explore, response times do vary, with a citizen spending an average of 5.5 minutes on the site. One should note that this represents a considerable timesaving for the prior research process citizens must endure to locate information on Federal benefits.

For purposes of calculation the burden, the Department calculates based on Web Trends® numbers that an average citizen will spend approximately 5.5 minutes (.09 hours) responding to questions and then obtaining the desired information. It is determined that 6,345,715 citizens visit the site in 12 months to use this service. Consequently the total burden is estimated to be 6,345,715 visits multiplied by the average visit length of 09 hours equaling 571,114.

T	Total Annual Total Annual		Estimated	Total Annual Burden		
	Number of	Number of	Burden Hours	Hours		
R	espondents	Responses	Per Response			
	6,345,715	6,345,715	.09 hours	571,114hours		

The Department has used the July 2011 average hourly and weekly earnings of all employees on private nonfarm payrolls of \$23.12 and increased it by 40 percent to estimate the value of respondents' time. *See The Employment Situation September 2011* Table B-3, page 32, U.S. Department of Labor, Bureau of Labor Statistics, http://www.bls.gov/news.release/archives/empsit 10072011.pdf.

571,114 hours x \$23.12 per hours x 1.4 fringe benefit factor = \$1,8485,818.

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information.

The DOL associates no additional cost burdens with this information collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

Below are the annualized cost estimates to the Federal Government for Benefits.gov. These costs reflect the total anticipated expenses associated with expanding the Benefits.gov web site and supporting technology over a ten-year life cycle.

Summary of Spending for Project Phases (Reported in Millions)

(Estimates for BY+1 and beyond are for planning purposes only and do not represent budget decisions)

	PY-1 & earlier	PY 2011	CY 2012	BY 2013	BY+1 2014	BY+2 2015	BY+3 2016	BY+4 & beyond
Planning Costs:	1.309	0	0	0	0	0	0	0
DME (Excluding Planning) Costs:	2.734	0	0	0	0	0	0	0
DME (Including Planning) Govt. FTEs:	0	0	0	0	0	0	0	0
Sub-Total DME (Including Govt. FTE):	4.043	0	0	0	0	0	0	0
O&M Costs:	48.661	3.362	3.003	3.999	4.08	4.163	4.246	13.25
0&M Govt. FTEs:	2.022	0.195	0.198	0.201	0.204	0.207	0.211	0.657
Sub-Total 0&M Costs (Including Govt, FTE):	50.683	3.557	3.201	4.2	4.284	4.37	4.457	13.907
Total Cost (Including Govt. FTE):	54.726	3.557	3.201	4.2	4.284	4.37	4.457	13.907
Total Govt. FTE Costs:	2.022	0.195	0.198	0.201	0.204	0.207	0.211	0.657
# of FTE rep by costs:	9	1	1	1	1	1	0	0
Total change from prior year final President's Budget (\$)		0	0					
Total change from prior year final President's Budget (%)		0	0					

15. Explain the reasons for any program changes or adjustments .to the burden estimates.

This ICR reflects no program changes or adjustments.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Not applicable

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The OMB number and expiration date is displayed on the webpage.

18. Explain each exception to the Department's ability to certify compliance the requirements captured 5 CFR § 1320.9 and the related provisions of 5 CFR § 1320.8(b)(3).

Not applicable.

B. Collections of Information Employing Statistical Methods

This Information collection plan does not employ statistical methods.