

**1205-0240 SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT OF 1995**

A. JUSTIFICATION

This is a justification for the Department of Labor, Employment and Training Administration's (ETA) request for a three year extension of the Labor Exchange Reporting System (LERS) with revisions. The ETA 9002 and VETS 200 (constructed through LERS) reports collect data on individuals who receive core employment and workforce information services through the public labor exchange and VETS funded labor exchange of the states' One-Stop delivery systems.

Currently, states submit quarterly performance data for the Wagner-Peyser Act funded public labor exchange and employment services through ETA 9002 reports and for the Jobs for Veterans' state grants' activities through the Veterans' Employment and Training Services (VETS) 200 reports. The Employment and Training (ET) Handbook No. 406 (OMB Control No. 1205-0240) contains the report forms and provides instructions for completing these reports. The ETA Handbook No. 406 contains a total of nine reports (ETA 9002 A, B, C, D, E, F; VETS 200 A, B, C). The ETA 9002 F will be a new report (PY 2012) and is required by statute for the purpose of reporting on the implementation of various priority of service requirements for veterans.

By July 1, 2012, ETA must modify the current reporting system to begin the collection of several statutorily required pieces of information. The first pertains to the priority of service provisions contained in the Jobs for Veterans Act (JVA), Public Law (Pub. L.) No. 107-288. These provisions provide that veterans and certain spouses of veterans (together comprising the category of covered persons) are entitled to priority over non-covered persons for the receipt of employment, training, and placement services provided under new or existing qualified job training programs. Qualified job training programs are defined at 38 U.S.C. § 4215(a)(2) as any workforce preparation, development or delivery program or service that is directly funded, in whole or in part, by the Department of Labor. For the purposes of this ICR, both the ETA 9002 and VETS 200 reports are impacted. Additional items are required under Public Law 112-56, Title II, Vow to Hire Heroes, Sections 238 and 239, and pertain to: (1) performance measures on job counseling, training and placement programs of the Department of Labor, and; (2) clarifications of priority of service for veterans in Department of Labor job training programs. Lastly, the expansive focus on veterans reemployment initiatives has necessitated collection of additional information on groups of veterans (such as Post 9/11 era veterans), targeted services they received, and additional aspects of their outcomes in order to monitor and oversee their effectiveness.

In summary, the following items will be added to the ETA 9002 and VETS 200 reports to collect this additional information beginning July 1, 2012:

- A new three item report was added to the 9002 (the 9002 F) to collect the required priority of service information. These items are: covered entrants who reached the end of the entry period, covered entrants who received a service during the entry period, and covered entrants who received a staff-assisted service during the entry period. These items have been

previously approved under the 1205-0468.

- A credentials field was added to the VETS 200 A, B, C, and the ETA 9002 D.
- A Post 9/11 era veterans column was added to the VETS 200 A, B, C, and the ETA 9002 B and D.
- A Homeless veteran column was added to the VETS 200 A and B.
- A Transition Assistance Program (TAP) column was added to the ETA 9002 B and D. A TAP row was added to the VETS 200 A, B, C.
- Four additional rows were added to the VETS 200 A, B, C, and the ETA 9002 C and D to collect median earnings information at the three and sixth month intervals, as required.

A.1 Circumstances Necessitating Data Collection

The Labor Exchange Reporting System (LERS) is the only current mechanism for collecting performance information on Wagner-Peyser Act Employment Services and Jobs for Veterans' state grants' activities. As such, this set of reports is necessary for tracking and reporting to stakeholders information on the usage, services provided, and performance of these programs. More specifically, these reports are used to monitor the core purpose of the program – mainly, tracking how many people found jobs; did people stay employed; and what were their earnings.

Information is collected on the ETA 9002 and VETS 200 Reports under the following authority:

A. Wagner-Peyser Act sec.3(a), 29 U.S.C. 49b(a)

“The Secretary shall assist in coordinating the State public employment services throughout the country and in increasing their usefulness by developing and prescribing minimum standards of efficiency, assisting them in meeting problems peculiar to their localities, promoting uniformity in their administrative and statistical procedures, furnishing and publishing information as to opportunities for employment and other information of value in the operation of the system and maintaining a system for clearing labor between the States.”

B. Wagner-Peyser Act sec. 3(c), 29 U.S.C. 49b(c)

“The Secretary shall –

(2) assist in the development of continuous improvement models for such nationwide system that ensure private sector satisfaction with the system and meet the demands of job seekers relating to the system.”

C. Wagner-Peyser Act sec. 7(b), 29 U.S.C. 49f(b)

“Ten percent of the sums allotted to each State pursuant to section 49e of this title shall be reserved for use in accordance with this subsection by the Governor of each such State to provide

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(1) performance incentives for public employment service offices and programs, consistent with performance standards established by the Secretary, taking into account direct or indirect placements (including those resulting from self-directed job search or group job search activities assisted by such offices or programs), wages on entered employment, retention, and other appropriate factors.”

D. Wagner-Peyser Act sec. 10(c), 29 U.S.C. 49i(c)

“Each State receiving funds under this Act shall –

(1) make such reports concerning its operations and expenditures in such form and containing such information as shall be prescribed by the Secretary, and

(2) establish and maintain a management information system in accordance with guidelines established by the Secretary designed to facilitate the compilation and analysis of programmatic and financial data necessary for reporting, monitoring and evaluating purposes.”

E. Wagner-Peyser Act sec. 13(a), 29 U.S.C. 491(a)

“The Secretary is authorized to establish performance standards for activities under this Act which shall take into account the differences in priorities reflected in State plans.”

F. Wagner-Peyser Act sec. 15(e)(2)(I), 29 U.S.C. 491-2(e)(2)(I)

“(e) State responsibilities. –

(2) Duties. – In order to receive Federal financial assistance under this section, the State agency shall—

(1) utilize the quarterly records described in section 2871(f)(2) of this title to assist the State and other States in measuring State progress on State performance measures.”

G. Provisional Guidance on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity, Executive Office of the President, Office of Management and Budget (66 FR 3829-3831); and Revisions to the Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity, (62 FR 58781-58790).

H. Priority of Service for veterans in Department of Labor job training programs sec. 38 U.S.C. § 4215(a)(2).

I. Public Law 112-56, Sections 238 and 239, Title II.

A.2 How, by Whom, and For What Purpose the Information is to be Used

Each quarter, states and territories submit data on individuals and employers who receive core employment and workforce information services through the public Employment Service and the Jobs for Veterans’ state grants activities available through the states’ One-Stop delivery systems. These data – submitted to the Department via the ETA 9002 and Veterans’ Employment and Training Services (VETS) 200 reports – are used by ETA and VETS to evaluate performance and delivery of labor exchange and employment services within the One-Stop delivery system.

ETA and VETS use the data to track total participants, aggregate information about characteristics, services and outcomes of job seeker customers. Additionally, ETA and VETS analyze the data to determine the delivery of core labor exchange services; to study performance outcomes vis-à-vis performance measures, and state policies and procedures; and to help drive the workforce investment system toward continuous improvement of outcomes and integrated service delivery. Within ETA, the data are used by the Office of Workforce Investment, the Office Unemployment Insurance, the Office of Financial and Administrative Management, the Office of Policy Development and Research, and the Office of Regional Management (including the regional offices). Other Departmental users include the Office of the Assistant Secretary for Employment and Training and the Office of the Assistant Secretary for Policy.

The reports and other analyses of the data are made available to the states, members of Congress, veterans' organizations, research firms and others needing information on public employment and workforce information services. Information about labor exchange and employment services for veterans are provided to Congress to meet VETS reporting requirements codified in Title 38 of the United States Code (U.S.C.).

A.3 Use of Technology to Reduce Burden

In recent years ETA has streamlined the collection of participant data and the preparation of quarterly performance reports to the extent feasible by providing uniform data elements and data definitions to states, and through the use of technology. All ETA 9002 and VETS 200 reports are submitted to ETA via the Internet. However, it is left to the states and local areas to decide the best technology for collecting individual case management data given their unique circumstances and resource availability.

The LERS, an automated reporting system, has been in use since 2001. ETA developed software for its Data Reporting and Validation System (DRVS) to assist states and territories with generating and validating the quarterly 9002 and VETS 200 reports. This software produces the reports in facsimile format as well as in a file format that can be uploaded directly to LERS. While this software will be in use through Program Year (PY) 2011, ETA is currently developing new data validation software that is web-based and requires only an upload of the underlying individual record files. Since 2002, states and territories have used LERS to upload the quarterly ETA 9002 and VETS 200 reports. With the rollout of the new DRVS, the report generation and submission will happen seamlessly upon upload of the individual record files. As such, ETA will reduce the burden of reporting and automate report generation through this process, while at the same time, collecting and reporting the additional requirements.

A.4 Efforts to Identify Duplication

Information provided through the ETA 9002 and VETS 200 reporting system (LERS) is not available through any other data collection and reporting systems.

A.5 Methods to Minimize Burden on Small Businesses

Small businesses and other small entities will not be affected by collection of this information.

A.6 Consequences of Less Frequent Data Collection

The prior implementation of common measures in the Wagner-Peyser Act funded public labor exchange and VETS funded labor exchange enhanced DOL's ability to assess the overall effectiveness and impact of the workforce investment system, including the performance of the system in serving individuals facing significant barriers to employment.

Performance and other relevant data for the Wagner-Peyser Act funded public labor exchange and employment service and the Jobs for Veterans' state grants are reported to DOL via the ETA 9002 and VETS 200 reports. If the collection is not conducted quarterly, then DOL cannot meaningfully assess the impact of the national public employment and workforce information

services on job seekers and employers for effectiveness and program management purposes. The inability to utilize accurate and current program information to develop strategies for continuous improvement could negatively affect labor exchange performance and future Congressional appropriations.

Both the DOL and recipient states and territories are mandated by various program-specific legislative acts, as well as the Government Performance and Results Act of 1993 (GRPA), to establish performance standards and make available reports concerning operations and expenditures.

A.7 Special Circumstances for Data Collection

These data collection efforts do not involve any special circumstances.

A.8 Federal Register Notice and Consultation Outside the Agency

A Pre-clearance Notice was published in the Federal Register on January 18, 2012 (Vol. 77, No. 11, Pages 2566 through 2567). Comments were received from seven States.

Public Comment Summaries	ETA Response
Two States expressed concerns that there was a lack of detail supplied in regard to changes to the data extract that will be submitted to the US DOL.	The details regarding the required changes to the individual record file and aggregate reports are provided in the ETA Handbook No. 406. All of the technical details are included in the handbook. . Additionally, ETA is currently developing new DRVS software that will construct the aggregate reports for States. As a result, States will only be required to submit a modified individual record data extract.
Three States disagreed with the US DOL's assertion that the proposed changes will result in a reduction of the reporting burden for states. One of the states stated that they use the current US DOL provided DRVS software to format the required reports and they upload the results in eight separate files. This State stated that although the report creation process takes a while, it does not require much human intervention and the uploading of the results takes only a few minutes. However, as we have learned from our experiences with uploading the revised WIA WIASRD report, the amount of human intervention required has increased exponentially. The second State stated that they used DART to produce their LERS quarterly reports and that	The new DRVS will indeed decrease the reporting burden placed on States. As the State pointed out, the current DRVS requires a data upload (which takes over 48 hours to load in many cases), as well as, the upload of 8 separate files. The new system will require only one upload and is expected to reduce the upload time from a couple of days to a couple of hours. There will be no change in the amount of human intervention that is required for submission. Currently, States must pass an equivalent number of edit checks when uploading an individual record file into both the old and new DRVS. There are little to no changes being made to the individual record file upload edit checks. In addition, the WIASRD submission will be seamlessly integrated into the new DRVS. As a result, States will only have to submit one quarterly individual record file per program and will no longer be responsible for generating and uploading the individual aggregate reports. In addition, States will no longer be required to

<p>going to the new system will require them to pass the DRVS edit checks, which they claim takes 20-24 hours per submission. The third State stated that the total annual burden of cost for this measure being \$0 is not realistic. The State commented that much of their agencies funding is for providing services and implementing the proposed changes diverts resources from serving people to updating systems for reporting. The State also commented that while they were alerted to the changes years in advance, the recession and budget situation of the State has lead to reductions in IT staff and resources, which they report are at an all-time low. The State also reports difficulty in recruiting capable IT personnel even if funds were to be provided. Finally, this State commented that their while their staff is at an all-time low, the number of people seeking services is nearly double its normal level.</p>	<p>maintain the software (this will be done at the federal level) or devote exclusive resources to processing the data and building the reports. All in all, the new system will combine multiple submissions and report uploads into singular combined upload and submission processes that will take place on federally maintained systems rather than on state IT resources. States that use DART will indeed have to pass the DRVS edit checks before the reports will be built. However, States are currently supposed to be fixing errors and warnings, albeit via different means, so this is not an additional requirement. Rather, it's simply a different means of identifying the errors. If the States that are using DART are currently submitting aggregate to reports to DOL based on individual record files that truly contain 20-24 hours of errors and warnings, then these States are not currently submitting the accurate and complete data they have certified that they are. The burden cost is \$0 because this is not a new data system and States already receive funds for these types of upgrades each year. While there are certainly significant costs associated with the upgrades, these costs are already funded. The cited burden costs represent unfunded or new start up costs. Furthermore, this is the first upgrade to this system since 2005 and yet States still received annual maintenance and upgrade funds in all seven of those years.</p>
<p>One State commented that the Job Seeker Data Collection burden estimate was not accurate. This State stated that, "while the Veteran population is much smaller than the general population, the flat file that is produced for the DRVS software contains all customers – therefore, this burden also should include all LX customers as well as Veteran customers". This state also commented that the self-service records in their data did not increase by 25% from PY 2007 to PY 2010. As a result, the State did not agree with the 1.5 minutes per record estimate that was utilized in estimating the national burden. This State also commented that the Quarterly Report Burden estimate did not reflect the revisions to the States' Case Management Systems that are required to collect this information.</p>	<p>The Job Seeker Burden estimate includes all LX customers in the burden estimate. In fact, the increase in the total number of LX records from PY 2007 (the last renewal) to PY 2010 resulted in an estimated burden increase of approximately 200,000 hours nationwide. Section A.12.(1) of the supporting statement provides the details. National averages were utilized for the computing the increase in the number of self-service records as well as in the estimate of minutes per record. While one State may not conform to these averages, national burden estimates must be based on the national data rather than on any particular State's situation. Nationally, the number of self-service only records increased by 25% from PY 2007 to PY 2010. The burden for the additional fields to the individual record layout that are required for the revisions to the Quarterly Reports are included in the Job Seeker Data Collection Burden rather than in the Quarterly Report Burden. This is because the burden is caused by the changes to the record layout and not by the Quarterly Reports. The</p>

	<p>Quarterly Report Burden involves only the burden due to building the reports. Note that under the new DRVS, States will not have to explicitly build or submit these reports. Those functions will be generated by the software.</p>
<p>Four States expressed concern regarding the congressionally mandated Priority of service reporting. One of the states expressed the concern that determining how and when to start the "timer" needs clarification as well as asking the question of whether or not they will have to collect this information retroactively for participants that were already enrolled. Another questioned the ability of the report to actually measure whether priority of service is being implemented. A third state expressed three concerns. The first was that veterans could make contact with the system and choose not to seek additional services. The second was that the state tracks only one POS entry date and many participants have multiple participations. Under this approach, there will be many cases where a participant (in the second or greater period of participation) will show up as not receiving a service within 45 days of the covered entrant date because that date was tied to their initial participation. Finally, the State stated that it will be difficult to report the POS information for participants with participation dates at or near the last day of the quarter. The fourth State sought the technical details associated with defining and reporting on POS and commented that the "Entry Period" was not defined. This state also expressed their concern that the POS information reported on the 9002F does not effectively measure POS.</p>	<p>Priority of service reporting is statutorily required under Public Law 112-56, Sections 238 and 239, Title II. To fulfill the requirements, States will have to begin tracking covered persons (defined in the introduction) at the point of their first contact with the workforce system. This requirement will only apply to persons contacting the workforce system after July 1, 2012. Retroactive dating is not required. ETA is leaving the determination of how states should do that to the States. This is due to the fact that States have many different types of reporting systems, which renders one overarching solution unfeasible. States are permitted to record the first contact with the workforce system (the covered entrant date) as equivalent to the participation date, in cases where that condition applies. The timer should be started at the point that the covered person first makes contact with the workforce system, either at a physical location or through an electronic resource for each period of participation. It is difficult to measure whether or not states are actually providing priority to veterans with any type of aggregate reporting structure. As a result, ETA has implemented a three pronged approach. The first involves the new 9002F report. This report will measure the share of veteran participants that receive service within 45 days of first contact with the system (for each participation). This will address the question of whether or not veterans are being denied services. The second will involve DOL funded evaluations that seek to identify whether or not veterans are receiving priority for things like receiving priority when being enrolled in the training programs with a limited number of slots. The third approach will involve comparing the share of state participants that are veterans relative to the share of the state population that are veterans. The full details associated with POS reporting are provided in the ETA 406 Handbook. It is important to note that the POS report (ETA 9002F) only contains items that were previously approved by OMB under 1204-0468. The "Entry Period" is equivalent under this and that collection.</p>
<p>Four States submitted comments regarding the tracking of credentials. One</p>	<p>Tracking credentials is not a new requirement for workforce system participants. These data elements</p>

<p>State commented that their system is completely dependent upon manual staff follow up with participants and that it is unclear how much interaction Wagner-Peyser funded staff will have with the veteran training providers. The second State asked whether or not the common measures approach to counting credentials will be used. Furthermore, this State commented that they would be in support of using the common measures approach. Similar to the second, a third state asked for the technical specifications on this measure, whether or not the credentials had to be pre-approved, and whether or not the credential could be obtained before program participation. Lastly, this State asked whether States will be held accountable for training outcomes for Wagner-Peyser funded training programs. The fourth State commented that collecting credentials in Wagner-Peyser funded programs requires reprogramming the State's MIS.</p>	<p>have been collected for many years in other areas. ETA expects that States develop the interaction with veteran training providers, as necessary, to report these credentials. The attainment of credentials is a cornerstone of workforce development strategies and reporting on such attainment is necessary for proper program management. All of the details are included in the ETA 406 handbook. The credential measure will be defined using the definition in Training and Employment Guidance Letter 17-05, issued on February 17, 2006. These outcomes will be provided to Congress as required under Public Law 112-56.</p>
<p>Three states sought clarification on how post 9/11 veterans will be identified.</p>	<p>The term "Post 9/11 Era veteran" is identified as a person who served for at least one day on or after September 11, 2001 in the active military, naval, or air service, and who was discharged or released there from under conditions other than dishonorable. All of these details are provided in the ETA 406 Handbook. The post 9/11 veteran category will be used also as a proxy for the Administration's Gold Card Initiative, to increase provision of intensive services to veterans looking for employment.</p>
<p>Two states commented on the three and six month median earnings measures required under Public Law 112-56. One State sought clarification on whether these are new performance measures while the other commented that these performance measure were unnecessary given the fact that average earnings information is already collected.</p>	<p>The three and six months median earnings measures were specifically required by Public Law 112-56 Sections 238 and 239, Title II. ETA will report outcomes on these measures; however, negotiations of performance goals will only be done on the Six-Months Average Earnings.</p>
<p>One State commented that participants can participate in more than one TAP workshop in the course of a period of</p>	<p>TAP reporting on the ETA 9002s and VETS 200s is slightly different. TAP reporting on the VETS 200s (the rows) reflect counts of TAP services that the State</p>

<p>participation. The State sought clarification on how this should be reported. The State also commented that many of the TAP workshop services are contracted out to an entity other than the State Workforce Agency. As such, these customers may not register with the workforce system. The State commented that they thought that this may cause reporting discrepancies.</p>	<p>provided to individuals in their state via the DVOP and LVERs. As a result, these individuals must be enrolled in the State's system to be counted. TAP reporting on the ETA 9002s (the columns) treats TAP like a characteristic of the particular participants. If a participant received a TAP service within the last three years, they must be reported on the 9002s irrespective of who and where the service was provided. This is not a reporting discrepancy as ETA is cognizant of the difference.</p>
<p>Two States sought clarification on whether or not the new DRVS will provide states with the option to certify their ETA 9002 and VETS 200 results after they are tabulated but before they are submitted to ETA. These two States also expressed interest in keeping the local area reporting capabilities in the current DRVS in the new DRVS. One of the States asked what recourse States will have if they do not agree with the report generated by DRVS.</p>	<p>The new DRVS process will still require state certification of the reports after they are calculated and prior to submission to ETA. Likewise, the new DRVS under development will include the local area reports as it did under the old system. States that do not agree with the report results can contact to ETA via the report certification procedures. Certification is required before the reports are submitted to ETA. Any discrepancies or other objections to the report calculations will be worked out with the State on a case by case basis.</p>
<p>One State asked whether the 18-44 age group could be disaggregated into subgroups at a finer scale.</p>	<p>The 18-44 age group will remain as it is. This is due to the fact that this metric has been utilized for many years and only 1 State is asking for smaller groups. This change would impose on the other States and areas for the benefit of one State alone. Furthermore, States can disaggregate their own information in any way they choose outside of this report.</p>
<p>One State asked whether the proposed continuation of the collection of information is necessary for the proper performance of the functions of the agency. This State questioned whether the required information was necessary for it to meet the needs of its customers. In particular, the State stated that the POS requirements would not enhance services to covered persons, but rather, would actually hinder services as resources are siphoned off to devote to system upgrades.</p>	<p>Effective program management requires accurate and timely information on the effects of the provision of services. Further, as the service provision mix changes, so too does the data that is required to effectively assess the costs and benefits of those services. It has been seven years since this system has been upgraded and many changes have taken place since. All that stated, it is important to note that the vast majority of the current upgrades were specifically mandated by congress. As a result, ETA has a legal obligation to collect and report this information even if it is not required for performance management.</p>
<p>One State requested that the proposed changes be delayed for an extended period to allow States adequate time to address the required changes. Time is a critical factor associated with system changes such as this and, unfortunately, the</p>	<p>ETA will be providing technical assistance to States to make the modifications as simple as is possible.</p>

commenting State does not have the human capital or funding resources to address them adequately.	
One State commented that the new column (H) on the ETA 9002 B and D reports was labeled “TAP Workshop Veterans and TSMs”. The State believes that this should be labeled “TAP Workshop Veterans” as a separate column (B) labeled “TSMs” already exists.	ETA noticed this issue subsequent to the posting of the FRN. The column heading has already been changed to that recommended by the State.
One State commented that According to the document, 1205-0240 SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL UNDER THE PAPERWORK REDUCTION ACT OF 1995, the fourth (4th) bullet on page 3 states, “A Transition Assistance Program (TAP) column will be added to the VETS 200 A, B, C and ETA 9002 B and D.” The State noted that the VETS 200 A report does not include a TAP column.	The statement in the supporting statement on page 3 was incorrect. It should have said A Transition Assistance Program (TAP) column was added to the ETA 9002 B and D. A TAP row was added to the VETS 200 A, B, C. This change has been made to the current supporting statement.
One State commented that the former “Average Earnings” row has been renamed “Six Months Average Earnings”. The State sought clarification on whether the measure has changed or whether this was simply a naming convention change.	The specifications and computational procedures for the Average Earnings measures have not changed. This row was renamed simply to clarify that this measure represents six months of average earnings rather than twelve months to end users of these reports.

A.9 Payment of Gifts to Respondents

There are no special payments to respondents other than the formula funds and incentive funds provided for in the authorizing statutes.

A.10 Confidentiality Assurances

All data will be aggregated, and will not include any identifying information.

A.11 Additional Justification for Sensitive Questions

There are no sensitive questions included in the proposed data collection.

A.12 Estimates of the Burden of Data Collection

The annual national burden for the current LERS has three components: (1) collecting and maintaining job seeker data; (2) collecting and maintaining job openings data; and (3) the quarterly summary report burden.

Integral to the common measures is the interplay between state reporting systems for Wagner-Peyser Act funded public labor exchange and employment services and Jobs for Veterans' state grants activities and the reporting systems of partner programs, as job seekers may be referred to other One-Stop partner programs for services. Thus, it is necessary to consider both the local and state level steps needed to collect data on labor exchange and employment service data. This interplay of multiple reporting systems adds a level of complexity to data collection and reporting functions.

(1). Job Seeker Data Collection Burden

The job seeker data collection burden considers the amount of information collected and reported on the ETA 9002 A through F and VETS 200 A through C reports that would not have to be collected by the states as part of their customary and usual burden to run the program. Thus, the burden reflects the information collected solely to comply with the federal reporting requirements.

The data collection burden varies by job seeker because it is based on the intensity of services provided and the number of elements applicable to the job seeker. For example, LERS requires the collection of several types of staff assisted service dates, if applicable. On the other hand, web based registrations and the use of wage records for measuring outcomes minimize the burden of data collection. Due to a 25 percent increase in self-service only records between 2007 and 2010 (web based registrations), the average minutes per record utilized in the calculation has been decreased by 25 percent relative to the last supporting statement. The additional reports and items added to the reports do not affect the burden estimate because all of the information that is reported is already collected at the state and local level. The only change occurs in constructing the additional aggregate reports (Quarterly Report Burden).

Record Type	Minutes Per Record	PY 10 Annual National Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
Data Input Employees - state-run programs and non-profit grantees	1	21,163,831	352,731	\$41.80	\$14,744,155

Hourly rates used to calculate cost depend upon the type of organization administering the program. For state-run programs, the hourly rate is the average hourly earnings for employees in state Unemployment Insurance (UI) agencies in FY 2011 (as used for FY 2011 UI budget formulation purposes). For private non-profit grantees, the hourly rate is the average hourly earnings in the Bureau of Labor Statistics' social assistance industry (except child day care) category (May 2008, Occupational Employment Statistics).

One half minute per record is the average estimate for burden hours incurred by the participant/job seeker.

Record Type	Minutes Per Record	PY 10 Annual National Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
jobseekers	.5	21,163,831	176,365	\$7.25	\$1,278,646

The value of the jobseeker’s time has been approximated at the current federal minimum wage, \$7.25 per hour.

(2). Job Openings Data Collection Burden

States must collect and maintain job openings data to prepare the 9002E report. OMB previously approved an estimate for job order record keeping of one hour per state per quarter, and job openings reporting requirements remain unchanged in this ICR. For 54 states and territories, this equals 216 hours per year in national burden. At the \$41.80 hourly wage rate applicable to state-run programs, the current hourly burden estimate calculates to \$9,029 per year.

(3). Quarterly Report Burden

The LERS **quarterly report burden** includes the local and state level steps that are needed to collect and report information on labor exchange activities. These steps include, but are not limited to, extracting data from states’ data systems for the public labor exchange and partner programs, aggregating data from separate reporting systems, formatting reports and transmitting the reports to the Department. OMB previously approved an estimate of 640 hours per year per State for the Quarterly Report Burden. The previous approved burden of 640 hours was based on 8 different reports. As result, OMB approved an estimate of 80 hours of burden per report per year or 20 hours per report per quarter.

$$20 \text{ hours per report per quarter} * 4 \text{ quarters} * 8 \text{ reports} = 640 \text{ annual hours per state per year}$$

The current renewal is adding one additional form (the 9002F). Using the approved annual average of 80 hours per report, the total quarterly report burden becomes 720 hours.

$$20 \text{ hours per report per quarter} * 4 \text{ quarters} * 9 \text{ reports} = 720 \text{ annual hours per state per year}$$

Program	Annualized Hrs. Per Year Per State	Number of Reporting Respondent States	Annualized Hours	Applicable Hourly Rate	Annual National Quarterly Report Burden
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					Dollars
Quarterly Report	720	54	38,880	\$41.80	\$1,625,184

The annual burden estimate for all states under this collection is approximately 568,192 hours as detailed in the following summary table. The estimated costs have been calculated using the hourly cost rate of \$41.80 for state staff.

Operating/Maintaining Burden Component: Recordkeeping	Annual National Burden in Hours	Annual National Burden in Dollars
<i>Data Collection</i>		
<i>Recordkeeping Requirements</i>		
Job seeker data collection, data entry employees	352,731	\$14,744,155
Job seeker data collection, job seeker hour burden	176,365	\$1,278,646
Job openings data collection (for 9002E report) record keeping component	216	\$9,029
<i>Reporting Requirements</i>		
Quarterly Summary Reports	38,880	\$1,625,184
Total	568,192	\$17,657,014

The total annual national burden is 568,192 hours. The total number of annual responses is 1,944.

$$54 \text{ States} * 9 \text{ reports} * 4 \text{ quarters} = 1944 \text{ total annual responses}$$

Taking the 568,192 total annual burden hours and dividing it by the 1,944 annual number of responses yields an estimate of 292.2757 hours of public reporting burden per response.

A.13 Estimated Cost to Respondents

The current LERS requirements have been in operation for several years and states have the necessary technology and data collection mechanisms in place to meet these approved reporting requirements. Therefore, the Department is not reporting any start-up/capital costs or annual operating costs as a part of this information collection request.

A.14 Estimates of Annualized Costs to Federal Government

The annual costs of maintaining the LERS database, maintaining the quarterly reporting software, and developing technical assistance guides are borne by ETA and are estimated to be \$475,820. This represents the same federal government burden hours previously assumed for WIA, adjusted based on a higher state hourly wage rate of \$41.80.

Total annual costs to the federal government are thus estimated to be \$475,820.

A.15 Changes in Burden

The changes in burden reflect three things. First, is the increase in the average wages for UI Agencies and the average wage in the Social Assistance industry. Second, the number of individual Wagner-Peyser records increased from approximately 14,000,000 in the previous ICR to nearly 20,000,000 by PY 2010. Third, an additional report was added to the ETA 9002 for reporting on priority of service for veterans (ETA 9002 F), which added 80 hours per state per quarter (total of 4,320). The primary reason for the increase in burden is the dramatic increase in the number of Wagner-Peyser individuals seeking employment services as a result of the down turn in the economy. Coincidentally, the average time per participant record decreased from 2 minutes to 1.5 minutes due to the increase in the share of self service only, of which 1/2 minute per record is the participant portion of the burden.

A.16 Tabulation of Publication Plans and Time Schedules for the Project

States and territories will submit ETA 9002 A, B, C, D, E, and F reports and VETS 200 A, B and C reports on a quarterly basis to DOL within 45 days after the end of each program year quarter.

Quarterly report data are analyzed by ETA and VETS staff. Data analysis is used to identify strategies for continuous improvement and areas where additional federal guidance is needed. DOL uses this data to prepare Government Performance and Results Act reports, management and budget reports, and other ad hoc reports.

Each year, the Department issues an annual report summarizing program performance against the Secretary's goals. Some of the data included in the Department's annual report is generated from the ETA 9002 and VETS 200 reports. ETA also publishes an annual report solely on the Wagner-Peyser Act Employment Service. To satisfy its requirements under Title 38, the Veterans' Employment and Training Service (VETS) publishes an annual report that focuses on services delivered by Disabled Veterans Outreach Program specialists and Local Veterans Employment Representatives. All reports are available on the Internet at www.doleta.gov/performance and accessible to the general public and interested stakeholders.

A.17 Approval Not to Display OMB Expiration Date

The expiration date for OMB approval will be displayed. We are not seeking approval to have this concealed.

A.18 Exceptions to OMB Form 83-I

No exceptions are requested in the “Certification of Paperwork Reduction Act Submissions.”

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not contain statistical methods.