

**PRA SUPPORTING STATEMENTS FOR REEMPLOYMENT AND ELIGIBILITY
ASSESSMENT (REA) REPORTS: OMB Control Number 1205-0456**

A. Justification.

Extension for existing approved forms, ETA 9128 and ETA 9129: This is a justification for the Department of Labor's (DOL) request to extend the information collection by State Workforce Agencies (SWAs) on the Reemployment and Eligibility Assessments (REAs) they conduct. The Secretary's authority to implement this reporting requirement is found in the Social Security Act (SSA) section 303(a)(6), 42 U.S.C. 503 (a)(6), which requires that state law include provision for:

The making of such reports, in such form and containing such information, as the Secretary of Labor may from time to time require, and compliance with such provisions as the Secretary of Labor may from time to time find necessary to assure the correctness and verification of such reports.

The Secretary interprets section 303(a)(6), SSA, to authorize DOL to prescribe standard definitions, methods and procedures, and reporting requirements for the collection of information on benefit payment accuracy and the reemployment of UI benefit recipients and to ensure accuracy and verification of these data.

On April 20, 2012, OMB approved DOL's emergency request that this data collection be approved and extended for six months, until October 31, 2012, including the new ETA 9128 U, the report currently used to collect data on REAs, with minor modifications for the purpose of collecting data on EUC08 claimants as mandated by Public Law 112-96. The other two approved forms that also need to be extended for three years are ETA 9128, on which the ETA 9128U is based, and the ETA 9129.

A-1. Reasons for Data Collection.

DOL uses the information collected in ETA 9128 and ETA 9129 1) to evaluate state performance in terms of service delivery; and 2) to report on the REAs, including the number of scheduled in-person reemployment and eligibility assessments, the number of individuals who failed to appear for scheduled assessments, actions taken as a result of individuals not appearing for an assessment (e.g., benefits terminated), results of assessments (e.g., referred to reemployment services, found in compliance with program requirements), estimated savings resulting from cessation of benefits, and estimated savings as a result of accelerated reemployment.

ETA 9128U, required by PL 112-96, is used 1) to evaluate state performance in terms of service delivery; and 2) to report on the REAs, including the number of scheduled in-person reemployment and eligibility assessments, the number of individuals who failed to appear for scheduled assessments, actions taken as a result of individuals not appearing for an assessment (e.g., benefits terminated), results of assessments (e.g., referred to reemployment services, found

in compliance with program requirements), estimated savings resulting from cessation of benefits, and estimated savings as a result of accelerated reemployment.

A-2. Users, Purposes, and Consequences of Failure to Collect the Information.

Data on REA workload counts and outcomes include counts of claimant participation, disqualifications, overpayments, reemployment service referrals, average duration of claimant benefits. ETA wants to foster unemployment insurance claimant linkages to One-Stop Career Centers so that claimants are afforded the opportunity to be familiar with and take advantage of the array of available reemployment services. Concurrently, SWAs are afforded the opportunity to assess the claimant's eligibility, develop a service plan appropriate for each individual claimant and to provide labor market information geared towards the individual needs of the claimant. States have broad authority to establish eligibility requirements that are appropriate for the labor markets they serve. The REA program has been established to promote thorough assessments of claimants' eligibility which continues to be challenging especially with the advent of telephone and Internet initial claims systems. Some studies have shown that often claimants who are called into a One-Stop Career Center for services cease drawing benefits. The REA program provides the specific data required to monitor this premise and to address any policy changes needed to harmonize One-Stop Career Center services with clients' benefit eligibility.

Data collected from the existing REA program on workload counts and outcomes include counts of claimant participation, disqualifications, overpayments, reemployment service referrals, average duration of claimant benefits. ETA wants to foster unemployment insurance claimant linkages to One-Stop Career Centers so that claimants are afforded the opportunity to be familiar with and take advantage of the array of available reemployment services. Concurrently, SWAs are afforded the opportunity to assess the claimant's eligibility, develop a service plan appropriate for each individual claimant and to provide labor market information geared towards the individual needs of the claimant. States have broad authority to establish eligibility requirements that are appropriate for the labor markets they serve. The REA program has been established to promote thorough assessments of claimants' eligibility which continues to be challenging especially with the advent of telephone and Internet initial claims systems. Some studies have shown that often claimants who are called into a One-Stop Career Center for services cease drawing benefits. The REA program provides the specific data required to monitor this premise and to address any policy changes needed to harmonize One-Stop Career Center services with clients' benefit eligibility. The data also provides a basis on which to answer questions from congress, which mandated the program, and offer the public data on the extent of reemployment services provided to claimants.

The data on ETA 9128U is specific to REAs that are performed on EUC claimants so that questions about services provided and eligibility status of these claimants can be answered from data collected on this instrument.

A-3. Technology and Obstacles Affecting Reporting Burden.

This data reporting requirement uses automated procedures for data collection, transmission, and analysis that utilize state and federal information processing technology. USDOL provides computers to each state and jurisdiction along with reporting software and a proprietary network to use to transmit data to the computers at the USDOL National Office.

A-4. Duplication.

There is no duplication.

A-5. Small Business.

This collection does not impact small businesses.

A- 6. Consequences of Less Frequent Data Collection.

Collecting this information less frequently would not allow for adequate monitoring changes or evaluation of the impact of the reemployment and eligibility assessments. Because state wage records are submitted quarterly and SWAs already report workload counts to ETA each month, collecting this data less frequently would not materially diminish the burden of this data collection initiative.

A-7. Special Circumstances Involved in Collection of Data.

Some of the proposed data elements are currently collected by SWAs. The proposed data collection requires initial programming to produce the specified quarterly reports. This request contains no other special circumstances. The timing of the data collection allows for the submission of workload counts one year in advance of the submission of outcomes data.

A-8. Preclearance Notices and Responses.

In accordance with the Paperwork Reduction Act of 1995, the public was given an opportunity to review and comment through a notice in the *Federal Register* on August 13, 2012 (Vol. 77. p 48172 *et seq*). No comments were received.

A-9. Payments to Respondents.

No payments are made to respondents.

A-10. Confidentiality.

There are no issues of confidentiality as no personal data on individual claimants is provided to ETA as part of this collection. ETA maintains strict controls over the data gathered through the UI reporting system. ETA does not receive any data on individual claimants from states at all as a requirement of this data collection. Only aggregate data describing activity for all claimants are reported to DOL.

A-11. Questions of a Sensitive Nature.

No questions of a sensitive nature are included.

A-12. Respondents' Burden and Cost of Collecting Information.

The original submittal was made when the program was first begun and it was envisioned as something that eventually all 53 states and jurisdictions would participate in. However, the funding is inadequate for this level of participation. During Federal fiscal year 2013, 42 states will be participating in the REA program for regular program claimants. All states will be conducting REAs for claimants in the Emergency Unemployment compensation program of 2008, consistent with the requirements of Public Law 112-96.

The total burden comprises SWA activities related to assembling automated record system files, conducting automated crossmatches of these files, and electronically reporting the results to DOL. Estimates of the burden follow, based on the fact that ETA awarded REA grants to states during fiscal year 2012, according to the availability of appropriated funds.

The new ETA 9128U has 53 quarterly respondents because each state currently operates the EUC08 program, and all EUC08 first payments are subject to this requirement to provide REAs. ETA estimates that it will take the same amount of time for states to complete the ETA 9128U as the ETA 9128 and the ETA 9129: 30 minutes, or .5 hours.

	ETA 9128	ETA 9129	ETA 9128U
Frequency:	Quarterly	Quarterly	Quarterly
Total Respondents:	42	42	53
Total annual (quarterly) Responses:	168	168	212
Estimated Time Per Response: (hours)	0.5	0.5	0.5
Burden Hours:	84	84	106

Total Burden Hours

84 + 84 +106= 274 hours

Total Unduplicated Responses

168+168+212= 548 responses

DOL believes the annualized value of State respondent time to be \$4,802.50. (274 hours x

\$40.99 = \$11,231.26. In monetizing the burden, DOL assumes State Workforce Agency staff will typically prepare the responses. DOL has used the FY 2012 program planning hourly wage for State workforce personnel in producing this estimate.

This report is prepared from mainframe records of state administrative records on reemployment services provided. As a result, there is no claimant burden.

A-13. Annual Cost to Respondents.

There are no annualized costs to respondents.

A-14. Annualized Federal Cost.

Federal costs are the staff required to receive and analyze the data. These costs are summarized as follows:

Program Office Staffing Costs	\$24,654
Mathematical Statistician – 0.1 Staff year, GS-14	\$13,354
UI Program Specialist – 0.1 Staff year, GS-13	\$11,300
Total	\$49,308

A-15. Reasons for Change in Burden.

The changes in burden reflect the fact that each state make an individual decision in each year regarding their participation in the REA program. As a result, the number of reports we anticipate will change with the number of states participating. The change from 41 states to 42 states participating produces a very small increase in overall expected burden.

16. Publication Information.

Decisions on publication of data have not been made.

17. Display of OMB Expiration Date.

The expiration date for OMB approval will be displayed.

18. Exceptions to the Certification Statement.

There are no exceptions to the certification statement.

B. This collection does not employ statistical methods.