

**SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION
MONITORING OF STATE IMPLEMENTATION OF CHANGES CAUSED BY PL 112-96**

A. Justification

The U.S. Department of Labor (USDOL) has responsibility for ensuring that states implement the extension and modifications to the Emergency Unemployment Compensation (EUC) program, including Reemployment Services and Reemployment and Eligibility Assessment Activities (REA) for recipients of EUC, herein referred to as EUC RES/REA, and the Work Search Audit requirement in accordance with the Middle Class Job Creation and Tax Relief Act of 2012 (Act), Title II, Subtitle C, and USDOL operating instructions.

ETA is responsible for conducting EUC reviews, Work Search Audit, and EUC RES/REA program reviews. Given the lack of resources available for detailed monitoring, ETA intends to use a questionnaire as a monitoring tool to establish which states are most in need of technical assistance. The goal of this questionnaire is to ensure that states have plans to properly implement and administer the EUC modifications, Work Search Audit, and EUC RES/REA requirements. This proposed collection should provide ETA with key areas in which technical assistance is necessary.

1. Circumstances that make the collection necessary. The recent enactment of the MCTRJC brought with it a large number of changes for states that are operating Federal UI programs in their states. Since ETA has principal responsibility for providing oversight of state UI operations, monitoring of modifications to Federally-sponsored UI programs is critical to ensure that claimants are properly served, and that states are not making improper payments using Federal funds. ETA cannot provide suitable oversight on state implementation of provisions in the MCTRJC without continuing to collect data describing state plans, state activities, state law changes and the use of Federal funds by states.
2. Use of Information. The information collected from state applications is used to evaluate state actions in response to the MCTRJC and prioritize additional technical support and oversight. ETA has scarce resources for regional monitoring so this information targets support and oversight activities where they are most needed. Any data collected on grant tracking is used to ensure that proper financial data is provided to support reimbursement and oversight of program development and administration.
3. Information Technology. ETA does anticipate that this data will be reported electronically, though not incorporated into the current automated reporting systems. Many of the reporting elements required in this collection involve narratives and would not reduce respondent or Federal burden by substantial automation and incorporation into existing automated reporting systems. The unique nature of each state's potential response, concerns, questions or comments also argue for a simple electronic reporting approach. All of the materials states provide are electronic and will be provided through email to the appropriate regional office.
4. Duplication. This data is not available from other sources in any manner.
5. Small Entities. There is no impact on small businesses. Only state workforce agencies are respondents to this collection.

6. Consequences of Not Collecting or Collecting Less Frequently. The consequences of not collecting this information could potentially be severe. Many of the changes to state UI programs compelled by the Act affect state benefit programs, and given the focus on improper payments in Federal programs, ensuring that states are in compliance and conformity with Federal law is critical. Some states may not have provided all information requested as there are a number of voluntary programs and grants created through the Act. States may have initially decided that participation in these programs was not feasible based on existing staffing, funding, and workload. However, recent inquiries make clear the fact that states are still considering adopting some or all of the programs and grants made available through the act so it is critical that USDOL retain the ability to monitor state planning and adoption of these provisions so as to avoid implementation errors that would be costly and difficult to correct once the program was operational.

7. 5 CFR 1320.5. There are no special circumstances associated with this collection.

8. Publication in Federal Register The Federal Register Notice inviting the public to comment on this request was published on August 13, 2012 (Vol. 77, p 48173 et seq). No comments were received.

Payment to Respondents. No payments are made to respondents.

10. Confidentiality. The materials in this collection contain no personal or confidential data.

11. Sensitive Questions. There are no questions of a sensitive nature.

12. Burden Hours. ETA Every State Workforce Agency (SWA) will need to submit a completed questionnaire. Based on conversations with USDOL regional office staff, ETA anticipates that states have the information on hand to complete this questionnaire and the burden involved will largely be organizational: compiling the answers electronically from various program offices and organizing them into the questionnaire itself. ETA estimates, based on conversations with the same regional staff that routinely conduct on-site reviews, that the average response time for completing the questionnaire will be 30 hours. As there are 53 SWA respondents to the questionnaire, the total estimated burden from this collection would be

53 respondents (SWAs) x 30 hours = 1,590 hours.

In monetizing this burden, DOL used the FY 2012 program planning average wage of SWA staff of \$40.99. As a result, the estimated cost of this reporting burden is 1,590 hours * \$40.99 per hour = \$ 65,174.10.

13. Burden Costs. There are no burden costs.

14. Federal Annualized Costs. The completed questionnaires will require some degree of analysis by ETA staff in order to accomplish the intended goal of identifying areas for concern and prioritizing technical assistance to the SWAs that are operating these programs. It is anticipated that for each completed questionnaire, ten hours will be required to review the individual responses from SWAs as well as meet with peers to

discuss and document findings. Given that there are 53 expected responses from SWAs operating UI programs, we estimate the aggregate Federal burden at:

53 responses x 10 hours per response = 530 hours.

In monetizing this burden, ETA generally assumes the hourly cost will be based on the current fiscal year's locality-based wage rate for a GS-12, step 7 employee (ref: <http://www.opm.gov/oqa/12tables/gsrates.xls>). The table below shows the various ETA regional offices (Atlanta, Boston, Chicago, Dallas, Philadelphia, and San Francisco) as well as the number of states that reside within those regions, and the FY 2012 locality-based pay rate for each. The resulting estimated cost burden is \$22,848.20.

Region	States	Hours per State	Total Estimated Hours	Estimated Hourly Rate	Estimated Cost Burden
ATL	8	10	80	41.34	\$ 3,307.20
BOS	10	10	100	43.25	\$ 4,325.00
CHI	10	10	100	43.36	\$ 4,336.00
DFW	11	10	110	41.82	\$ 4,600.20
PHL	6	10	60	42.21	\$ 2,532.60
SF	8	10	80	46.84	\$ 3,747.20
Totals	53	10	530		\$ 22,848.20

It should be noted that this is a one-time cost, and not an annualized or recurring cost.

15. Changes in Burden. There are no changes in burden.
16. Publication. There are no plans to publish the data collected from this project at this time.
17. Display of OMB Approval and Expiration. ETA will display the OMB control number and expiration date once on each directive (UIPL).
18. Certification Exceptions. There are no exceptions.

B. Collections of Information Employing Statistical Methods

Statistical methods are not employed for this report.