

**OMB Control No. 1205-0001:
Work Application / Job Order Recordkeeping
Supporting Statement**

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.*

Work applications (commonly referred to as the registrations) are used in American Job Centers for individuals seeking assistance in finding employment or employability development services. They are used to collect information such as: applicants' identification, qualifications, work experience, and desired pay. They also include services provided to applicants, such as job development, referral to supportive service.

Job orders are used in American Job Centers to obtain information on employer job vacancies. Information in the job orders include employer identification, job requirements, pay information as well as identification of persons referred, hired, or refused. The information is collected at the employer's request in order to publicize job vacancies. The information is collected by American Job Centers and posted on electronic job banks.

The exact information to be collected on work applications and job orders (and the manner in which it is maintained) is determined by the State. At a minimum, the information to be collected is that which enables the State to comply with regulations under 20 CFR 652 and the Wagner-Peyser Act, as amended.

Regulations 20 CFR 652.8(d)(5) states, in pertinent part, as follows:

“Each State shall retain basic documents for the minimum period specified below:

- (i) Work Application: One year
- (ii) Job orders: One year”

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.*

The federal requirement that work application and job orders data be maintained for one year is needed for federal monitoring of state labor exchange operations and for use in substantiating the required minimum reporting items submitted. Retention of data for one year is necessary in event of issues that may arise when information must be verified. The Department of Labor can thus report on data that can be verified to a source record.

In addition, should a complaint arise, this information retained will show the services provided to the applicant and the terms and conditions of the job listed in the job order.

- 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 bias for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

State Workforce Agencies, through American Job Centers, collect this information electronically.

- 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.*

No duplication exists.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.*

Small businesses are not involved.

- 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 only requirement is for retention of work application and job order information for one year. The burden is rather minimal and if the information is not maintained DOL would be unable to conduct required monitoring activities and data validation.

- 7. Explain any special circumstances that would cause an information collection to be conducted.*

There are no special circumstances that would cause an information collection to be conducted.

- 8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.*

As required by 5 CFR 1320.8(d), a notice for sixty days' public comment on this information collection was published in the Federal Register on February 6, 2013 (Vol. 78, p 8584). No comments were received.

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

There is no payment or gift to respondents.

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

Assurance of confidentiality is not involved in this retention of data.

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 such questions are asked.

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

Under the ETA 9002 E, OMB 1205-0240, the states must report on "Job Openings Received by Occupation (O*NET-SOC) and Industry (NAICS)" that are listed through staff funded by Wagner-Peyser. The ICR provides: "States must collect and maintain job openings data to prepare the 9002E report. The 1205-0240 burden estimate includes the burden of processing and posting the job orders; consequently, ETA has determined control number 1205-0001 imposes no unique reporting burden on States other than the burden reported below.

Section 3(a) of the Wagner-Peyser Act requires DOL to "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 procedure, furnishing and publishing information as to opportunities for employment and other information of value in the operation of the system and maintaining a system of clearing labor between the States," and the States receive formula grants for these purposes. States agencies process and post job orders to match residents with job opportunities in the normal course of their activities with financial assistance from the federal government. States would be likely to conduct these types of activities to help their residents find jobs, even in the absence of federal funding, and so there is no federal burden for PRA purposes. The unique federal burden to retain job orders for one year after they are processed and posted by the states is accounted for in this estimate, and it has been determined that there is no burden on the private sector encompassed in 20 CFR 652.8(d)(5). There is no general federal requirement for all employers to file job openings with States; consequently, the ETA has determined that employers have no third-party disclosure requirements under control number 1205-0001.

The burden of maintaining work application and job orders data for one year in the automated environment, which exists in all States, is minimal since maintaining records, updating files, purging records and preparing reports are a necessary part of normal State labor exchange operations. The annual burden estimated for retention of information is estimated at 8 hours per state, (52 states x 8 hours) or 416 hours total.

The burden hours are based on a workload of 25,000 bundled files of openings and applications electronically archived at approximately 1 minute per bundle. This is a total of 416 hours. When divided by the total number of respondents (52), the workload is roughly 8 hours per respondent.

Burden Worksheet

25,000 consolidated openings/apps
minutes per electronic/paper
1 archiving
52 responses (states + territories)
8 hours per response
total hours
416

\$41.80 (hourly staff time) x 416 annual hours' burden = \$17,388

13. *Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).*

There are no other costs involved.

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.*

No direct Federal costs are associated with this effort.

15. *Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.*

There is no change. The burden hours for state agency staff were monetized.

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.

There are no plans to publish data.

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.

Approval is not sought not to display the expiration date for OMB approval of the information collection. .

18. Explain each exception to the certification statement identified in Item 19, "Certification of Paperwork Reduction Act Submission," of OMB 83-I.

There are no exceptions.

B. Collection of Information Employing Statistical Methods (if Item 17 of the OMB 83-I is checked Yes, answer the questions that follow).

Collection of Information does not employ statistical means.