

## Supporting Statement for the ETA 218, Benefit Rights and Experience, OMB Control No. 1205-0177

### A. Justification

#### 1. **Explain the circumstances that make the collection of information necessary.**

In order for an individual to be eligible for a State unemployment compensation program, the claimant must meet certain requirements which demonstrate attachment to the labor force. The vast majority of states use past wages for this purpose, however, a few States use actual weeks of work. Information relative to this first test of eligibility, known as monetary eligibility, is reported on the ETA 218, Benefit Rights and Experience Report. The data in the ETA 218 report includes numbers of individuals who were and were not monetarily eligible, those eligible for the maximum benefits, the number of newly eligible claimants categorized by potential duration, and the number of benefit exhaustees categorized by their actual duration. Authority for collection of this information is under Section 303(a)(6) of the Social Security Act.

#### 2. **Explain how, by whom, how frequently, and for what purpose the information will be used.**

Data used to compile this report comes from information that is a by-product of administering the program. This data is collected as part of the initial claim process. It is transmitted electronically to the National Office on a quarterly basis. This data is used by the National Office in solvency studies, cost estimating and modeling, and to assess State benefit formulas. If this data were not available, cost estimating and modeling would be less accurate.

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

All state information on Unemployment Insurance (UI) claimants is computerized, so the information states use to produce this report is already in an automated format suitable for producing this information. The ETA 218 is reported electronically to the National Office with States having the option of directly uploading data from their computer to the reporting system which stores and transmits the data, thus eliminating any keying. States are free to use any technology available to further reduce reporting burden.

#### 4. **Describe efforts to identify duplication.**

The data collected on this report is not a duplication in any way: there are no other reports on which this level of detail is available. There are some other reports where information is collected that allows us to verify that the values reported are reasonable. As an example, the ETA 5159 (1205-0010) has states report first payments, which should track closely with the

number of monetary determinations on the 218. So although data with some similarities are collected on other reports, the specific data items on this report are not collected anywhere else, so there is no degree of duplication.

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

This collection does not involve small business or other small entities.

6. **Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If it were collected less frequently, there would be fewer data points on which to project short term trends. Our allocation system is quarterly so it is desirable to project workload and related information at least on a quarterly basis.

7. **Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

This collection is consistent with the guidelines in 5 CFR 1320.5.

8. **Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission.**

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to review and comment on this data collection by way of a Notice published in the *Federal Register* on November 19, 2012 (Vol.77, p. 69503). No comments were received.

9. **Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

There are no payments or gifts to respondents.

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

There is no assurance of confidentiality.

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.**

The collection does not involve questions of a sensitive nature.

12. **Provide an estimate in hours of the burden of the collection of information.**

Respondents for this report are the 53 State Workforce Agencies. Each State agency must submit 4 reports per year, one per calendar quarter. Each State agency must also submit a report for each UI program in which claimants are receiving benefits. Given the possibility of claimants establishing entitlement in three benefit programs in CY 2013, a full estimate of potential reporting burden would include 4 quarterly reports in each of three programs; the regular program, the Emergency Unemployment Compensation (EUC) 2008, and Federal-State Extended Benefits (EB), for a total of twelve reports per state per year.

Instruments	Respondents	Hours Per Response	Annual Response Frequency	Total Responses	Annualized Hours
ETA 218 for Regular Program Claimants	53	0.5 hours	4	212	106
ETA 218 for Federal-State EB Claimants	53	0.5 hours	4	212	106
ETA 218 for EUC2008 Claimants	53	0.5 hours	4	212	106
<b>Unduplicated Totals</b>	53			636	318

In monetizing this burden, DOL uses the FY 2013 program planning average wage of SWA staff of \$42.09. As a result, the estimated cost of this reporting burden is 318 hours \* \$42.09 per hour = \$13,384.62.

13. **Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).**

There are no other costs involved other than those mentioned in item 12.

14. **Provide estimates of annualized cost to the Federal government.**

This on-going data collection is part of a much larger computerized system and Federal costs for any one report cannot be broken out.

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

Previously, this collection claimed burden for 53 SWAs to provide quarterly reports in the regular program and 2 SWAs to provide 2 quarterly reports in the EB program which is episodic. This produced a total burden of 108 hours.

This collection predated the great recession and federal laws establishing additional Federal benefit programs, as well as paying the state cost of the EB program, which caused an increase in the number of states establishing EB entitlement. This report collects data on the status of eligibility determinations and the entitlement created and used in the UI program. When additional benefit programs become active, states must provide additional reports.

For the EB program, the previous burden total was four responses requiring a total of two hours (30 minutes each), but the projected burden estimate is now 212 responses equaling 106 hours, for a difference of 208 responses and 104 hours. For the EUC 2008 program, there was no burden claimed previously, so the current burden estimates include 53 SWAs submitting 4 quarterly reports in that program, for a difference of 212 responses and 106 hours.

The total difference from the last submittal is an increase of 420 responses equating to 210 hours.

16. **For collections whose results will be published, outline the plans for tabulation and publication.**

The data collected on the ETA 218 describing monetary determinations, as well as potential and actual duration for claimants, are summed over four quarters and published in the annual ET Handbook 394, Unemployment Insurance Financial Data.

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

ETA displays OMB control number and expiration date on the ETA 218 hard copy form as well on electronic input form. A menu option has also been incorporated into the UI electronic reporting system which provides access to a complete listing of OMB control numbers and expiration dates for all required reports, including the ETA 218. In addition, ETA will disseminate

OMB control number and expiration date information for this report through an ETA Directive shortly after OMB action.

18. **Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

There are no exceptions.

**B. Collections of Information Employing Statistical Methods.**

This collection does not involve statistical method.