

December 9, 2011

MEMORANDUM FOR: Reviewer of 1220-0032

FROM: RICHARD L. CLAYTON, Chief
 Division of Administrative Statistics and Labor Turnover
 Bureau of Labor Statistics

SUBJECT: Information Collection Budget Report Correction
 for the Annual Refiling Survey (ARS)

On December 20, 2010, the Annual Refiling Survey (ARS) was approved by OMB with clearance expiring on December 31, 2013. The purpose of the ARS is to review private sector employers' North American Industry Classification System (NAICS) codes and geographic codes. Supporting Statement A, included with the ARS clearance package documents, specified that the BLS intended to return to a three-year review cycle from the four-year cycle that began in FY 2007. BLS temporarily moved to a four-year cycle in order to focus on the development of a new State processing system. Funds are no longer being diverted to pay for the State system redesign work. Thus, the ARS is returning to a three-year review cycle in FY 2012 so that changes in the industrial and geographical compositions of our economy are captured in a timelier manner and reflected in the BLS statistical programs.

The ARS remains largely a mail survey, although steps have been taken to reduce the amount of mail. For example, the BLS 3023-NVS form is mailed to employers that have a single worksite within a State. Employers with a single worksite within a State are potential users of the BLS Touchtone Response System (TRS) if they meet certain criteria. First, a physical location must exist for the establishment. Second, the NAICS code currently assigned to the establishment must be valid and cannot be NAICS code 999999 (Unclassified Establishments). Finally, the establishment must contain a United States business mailing address. If all of these conditions are met and there are no changes to these data elements based upon the employer's review, then the employer can use the TRS. The TRS is quick, free, and convenient. Using the telephone also allows respondents to help BLS reduce survey costs because they do not need to return the form in the business reply envelope provided.

Building on the success of the TRS, the BLS would like to add another reporting option for the NVS form. On the current NVS forms, we would like to inform respondents that they can provide their information via a secure website. There has not been any web-reporting option available for the NVS to this point. Respondents would still be able to mail their returns if they so desired or they could use the TRS if eligible and if they had no changes to report. Respondents are being asked the same information as they are now; we simply want to offer them the opportunity to respond electronically.

The Web collection site is <https://idcfars.bls.gov/ARS>. Copies of the NVS form offering the web-reporting option and the web collection screenshots are attached. Essentially, both have the following characteristics:

- The NVS forms offering the web-reporting option and the website contain the same confidentiality statements and contact information as the ARS forms without the web-reporting option that have already been approved. Reporting directions have been added to emphasize that respondents can report changes at our secure website.
- The NVS forms offering the web-reporting option and the website ask respondents for the same information as the ARS forms without the web-reporting option that have already been approved.

Since we will be collecting the same ARS information as before, we do not expect that the web-collection option will have any significant effect on respondent burden. Respondents will be given the choice of reporting information via the website or by other existing ways — whichever they find most convenient.

The increase of total hours requested, from 128,838 hours to 147,564 hours, is due entirely to the return to a three-year cycle for the ARS. It is not due to our desire to offer an alternative collection method for the ARS information.

The previous burden hours of 128,838 were based on record counts from the 2009/3 Quarterly Unemployment Insurance Address Files. Using more current information from the 2010/3 and 2011/1 Quarterly Unemployment Insurance Address Files results in the following estimate for the FY 2012 burden-hours projections:

Form Number	Total Respondents	Frequency	Total Responses	Average Time Per Response	Total Burden (Hours)
BLS 3023-(NVS)	1,441,528	Once	1,441,528	5 minutes	120,127
BLS 3023-(NVM)	39,277	Once	39,277	15 minutes	9,819
BLS 3023-(NCA)	105,707	Once	105,707	10 minutes	17,618
Totals:	1,586,512		1,586,512		147,564

If you have any questions about this request, please contact Richard L. Clayton at 202-691-6515 or e-mail at Clayton.Rick@bls.gov or Michael Searson at 202-691-6469 or e-mail at Searson.Michael@bls.gov.