

SUPPORTING STATEMENT 2014
OMB No. 1205-0150
PAPERWORK REDUCTION ACT SUBMISSION TO RENEW THE
ETA 207, NONMONETARY DETERMINATION ACTIVITIES REPORT

A. Justification

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

Claimants for unemployment insurance may be denied their benefits for reasons associated with their separation from employment, such as voluntary quit, or questions of continuing eligibility, such as refusal of suitable work. These data are a byproduct of the normal program operations. The ETA 207 report contains state data on the number and types of issues that arise and on the denials of benefits that may result.

This collection is authorized under the Social Security Act, Section 303(a)(6).

2. Use of the information.

These data are used by the Office of Unemployment Insurance (OUI) to determine workload counts, to enable the OUI to evaluate the adequacy and effectiveness of adjudication determination procedures, and to evaluate the impact of state and Federal legislation with respect to disqualifications. They are also used for general statistical purposes. For instance, these data are used to compute ratios of nonmonetary determinations resulting in disqualifications, as well as measures reflecting the distributions of nonmonetary determinations by the eligibility issues involved. No similar data are available from other sources.

Workload counts are an input for funding states for administrative costs. Comparative figures among states give the ETA National Office information about the effectiveness of the various state provisions and or administrative procedures in carrying out the program. Combined with information from the ETA 5130 (OMB No. 1205-0172) and the ETA 227 (OMB No. 1205-0173), individual state programs and legal provisions can be evaluated as to effectiveness.

Without this information, the National Office would not be able to evaluate state performance in the adjudication area on an ongoing basis and it would not have one of the key inputs to the administrative funding process.

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.

As with most UI reports, the ETA 207 is a part of an electronic reporting system through which State Workforce Agencies enter and transmit data to the National Office. States have the option

of creating a file on their own computer system and uploading it to the UI system to eliminate hand keying and the potential for errors that go along with it.

4. Duplication.

There is no other source for this information.

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 entities.

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

Less frequently than a quarterly collection would mean less ability to track impact of legislation and less ability to track patterns of activity within a state over time.

7. Special circumstances under 5 CFR 1320.6.

The collection does not implicate any special circumstances under 5 CFR 1320.6.

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

National Office program staff are routinely in touch with Regional staff who work with state staff through phone calls, visits and conferences and are also available to state staff. During the last three year clearance cycle no comments have been made that would suggest that changes are needed to this information collection. Also, in accordance with the Paperwork Reduction Act, a Notice was published on July 3, 2013 (Vol. 78, p. 40194), and the public was allowed 60 days to review and comment on this information collection request. No comments were received.

9. Payment to Respondents.

There were no payments or gifts to any 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 to respondents.

11. Questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Estimates of the hour burden of the collection of information.

The estimated annual burden for this collection is 2,544 hours (848 hours for the ETA 207 report covering the regular state program, the Federal-State Extended Benefits program, and the EUC 2008 Emergency Federal compensation program).

Program Type	Respondents	Hours per Response	Annual Reporting Frequency	Total Annual Responses	Estimated Annual Burden Hours
Regular	53	4	4	212	848
EB (Extended Benefits)	53	4	4	212	848
EUC 2008	53	4	4	212	848
Unduplicated Total	53	4	12	636	2,544

The cost of assembling the reports is estimated to be \$109,977.12 per year. This estimate is arrived at by multiplying the annual burden hours by the FY 2014 average hourly wage for state workforce agency staff that was computed in the development of the FY 2014 state UI base administrative grants. The details of the calculation is as follows:

2,544 hours x \$43.23 per hour = \$109,977.12, however, the Federal government pays the salaries of the state staff via administrative funds, so there is no direct cost to the states.

13. Capital/startup and operations/maintenance costs.

The ETA 207 is a long standing data collection, and as such there are no startup costs. All reports are collected and electronically transmitted. The Department has determined that additional costs incurred by States choosing to create a file on their own computer system and uploading it to the UI system would not be considered an additional burden under the PRA; rather any additional effort would most appropriately be considered a usual or customary business practice that a respondent engages in for its own purposes. See 5 C.F.R. § 1320.3(b) (2).

14. Provide estimates of annualized costs to the Federal Government.

During FY2014, ETA has budgeted \$791,000 to operate and maintain the Unemployment Insurance Required Reports system. Including the subject ICR, this system supports 30 information collections. For administrative purposes, each information collection is assumed to contribute an equal share of the cost for supporting the entire system; therefore the cost allocated to this ICR is estimated to be \$26,367 (\$791,000 system cost/30 information collections).

15. Changes in Burden.

There is no change in the estimated burden necessary to file individual reports or in the expected number of reports.

16. Publication.

This data is not routinely published.

17. Request to not display OMB number expiration date.

Instrument cleared through this ICR will bear the expiration date.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This request does not employ a statistical methodology.