

SUPPORTING STATEMENT
ETA 902, Disaster Unemployment Assistance Activities Report
OMB No.: 1205-0051

A. Justification

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

Public Law 100-707 (Sections 410 and 423 of The Robert T. Stafford Disaster Relief and Emergency Assistance Act [the Stafford Act]) provides for assistance to eligible individuals who are unemployed due to a major disaster. State Workforce Agencies through individual agreements with the Secretary of Labor (Secretary), act as agents of the Federal government in providing Disaster Unemployment Assistance (DUA) to eligible applicants who are unemployed as a direct result of a major disaster.

The ETA 902 is a monthly report submitted by the states on DUA program activities once a disaster is declared by the President.

ETA 902 is prescribed by the Secretary under 20 CFR 625.8 and 625.9 and is necessary for oversight of the DUA program. Collection is authorized under Section 303(a)(6) of the SSA.

2. **Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

The ETA 902 report includes information on the number of claimants who filed for DUA, including self employed individuals; number of claimants denied DUA benefits; the amount of DUA benefits paid; the number of appeals filed; and the number of overpayments issued. The report is also used to monitor state agency expenditures and to support requests for additional administrative funds from the Federal Emergency Management Agency (FEMA) within the Department of Homeland Security (DHS), which provides the funds for administration and benefits for the DUA program. A facsimile of this report is included in Attachment B.

The data allows Employment and Training Administration's Office of Unemployment Insurance (OUI) to do comparative analyses of states' performance and to monitor the impact of the disaster and properly manage the resulting financial accountability.

If these data were not available, OUI would not have sufficient information to monitor and assess states' performance in administering the DUA program and related activities. Any attempts to identify risks to the program or resolve potential problems would be greatly hindered.

2. **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.**

The states are continually improving program operations and their information handling technologies and, where feasible, new methods are used for taking applications, and collecting and transmitting the data for these reports. For example, many states have implemented automated remote claims-taking systems, and automated recordkeeping. Reduction of burden through increased automation is always encouraged and supported. As with most unemployment insurance (UI) reports, the ETA 902 report is part of an electronic reporting system through which state UI agencies enter the data on a monthly basis and transmit the data to the ETA National Office.

4. **Description of Effort to Identify Duplication.**

FEMA/DHS has delegated authority to the Department of Labor for the DUA program. Neither FEMA nor any other agency collects information prescribed on the ETA 902 report. The data requested are not available from any other source. Therefore, there is no duplication in the information being requested.

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

The information collection does not involve small businesses 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.**

The ETA 902 report is due monthly when a disaster makes submittal of the report necessary. If these data were collected less frequently, ETA's ability to carry out its oversight responsibilities, document disaster impacts, and monitor program effectiveness would be greatly weakened. The funding needs projections would be more unpredictable. Effective accounting of DUA payments and other DUA expenditures would also be hindered. Claimants must certify for DUA on a weekly or bi-weekly basis, which coincides with the frequency required for regular unemployment insurance benefits. The monthly ETA 902 data collection allows the Department of Labor to assess the overall impact and effectiveness of the DUA program(s) administered by the states.

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

There are no special circumstances.

8. **Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken**

by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

As required by 5 CFR 1320.8(d), ETA solicited comments on the proposed extension of approval for the ETA 902, ETA 902-A Report through publication in the Federal Register, (Volume 79, No. 54, Page 12760), March 20, 2014. No comments were received.

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

No payment or gift is provided to respondents, other than remuneration of contractors or grantees.

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

The ETA 902 report does not identify individuals receiving benefits by name or social security number. Respondents have no expectation 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.**

There are no items to be completed on the forms which involve sensitive information of a private nature or otherwise.

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

Time Estimate

On average, there are approximately 50 presidentially declared disasters each year nationwide occurring in about 30 states and about 30 of these disasters include DUA. Approximately 6 ETA 902 monthly activity reports are submitted per disaster that includes DUA. Estimated average response time for a single report is one (1) hour. There is a final report submitted for each disaster activity, which averages one (1) hour for preparation of the report. Specific breakout of burden hours is as following:

- *Reporting of 902: 30 state disaster declarations x 6 reports per year x 1 hour p/report = 180 hours annually.*
- *Reporting of Final Report: 30 state disaster declarations x 1 Final Reports per year x 1 hour per report = 30 hours annually.*

Total annual estimated burden hours = 210

Respondent Time Value Estimate

▪ $210 \times \$43.23^1$ per hour = \$9078.30 (annualized cost).

Total annual time burden: ETA 902 (210 hours) Total annual cost burden: ETA 902 (\$9,078.30).

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 associated with this collection of information.

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

During FY2014, ETA has budgeted \$1,130,000 to operate and maintain the Unemployment Insurance Required Reports system. Including the subject ICR, this system supports 40 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 \$28,250 (\$1,130,000 system cost/40 information collections).

15. **Explain the reasons for any program changes or adjustments.**

The 902-A, approved by OMB during the last submission, was designed specifically for the Gulf Coast Oil Spill disaster. No 902-A reports were submitted, and the time has passed for submitting the 902-A, so it is no longer part of this collection request.

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

There are no plans to publish the data for statistical use.

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.**

The OMB number and expiration date will be displayed as part of the Handbook instructions for the ETA 902 report.

18. **Explain each exception to the certification statement**

¹ **Source:** The hourly rate is computed by dividing the FY 2014 national average PS/PB annual salary for state staff as provided for through the distribution of state UI administrative grants (http://wdr.doleta.gov/directives/attach/UIPL/UIPL_23_13_Att1.pdf) by the number of hours worked in a year (1,711). $\$73,972$ annual rate/1,711 hours = \$43.23. $(180+30=210 + 2= 212 \times \$43.23=\$9,164.76)$

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods.

Statistical methods are not used in the collection of the ETA 902.