

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSIONS
UNEMPLOYMENT INSURANCE SUPPLEMENTAL BUDGET REQUEST ACTIVITIES
(Form ETA-9165)**

Part A Justification

1. **Circumstances that make the collection necessary.** The new ETA 9165 report will contain information on activities funded by the US Department of Labor's (Department's) Employment and Training Administration (ETA) through Unemployment Insurance (UI) Supplemental Budget Requests (SBRs), including the funded project/activity, the targeted start and completion dates for the project/activity, and the quarterly implementation status. These data are needed for budget preparation and control; program planning and evaluation; program monitoring, oversight, and performance accountability; actuarial and program research; and for accounting to Congress and the public. This collection is authorized under the Social Security Act, Title III, Section 303(a)(6).

2. **Use of Information.** The information to be collected on the ETA 9165 report will be used by the National and regional offices to monitor the progress of State Workforce Agencies (SWAs) in successfully implementing projects funded through SBRs. This information will include the funded SBR project title and purpose, the project timeline and milestones, a narrative description of the project implementation status. It will also include explanations of any delays in implementation, proposals for addressing any problems that caused the delay and new project timelines if applicable, a self-reported designation of the implementation status (i.e. complete/ ahead of schedule/on schedule/or behind schedule), and a discussion of identified technical assistance needs for the successful completion of the project.

In recent years, the Department has provided SBRs to states with incentives to accelerate state actions to prevent and reduce improper payments, improve program performance, support states' Information Technology system modernization efforts as well as fund other priority initiatives such as enhance reemployment activities and prevent worker misclassification.

The information to be collected in this report is frequently requested by the public and the Department makes the status of these projects such as those related to program integrity projects available on a quarterly basis via a Web site, <http://www.dol.gov/dol/maps/map-ipia.htm>. This information is currently reported by the states to the regional offices on an ad hoc basis and in no standardized format. This data collection is expected to provide consistency in reporting by states regarding the implementation status of these projects and for the Department to use this information to effectively track the progress made by the states and assess the impact of these implementations on program operations and performance.

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3. **Information Technology.** States will use a simple form provided by the Department to email this report to the regional office.
4. **Duplication.** This data is not available from other sources in the detail needed to assess state progress in implementing individual SBR projects.
5. **Small Entities.** This information collection is directed to states. There is no impact on small entities.

6. **Consequences of Not Collecting or Collecting Less Frequently.** The new collection is a basic report on the progress of supplemental grant projects funded by ETA. It contains simple data elements and narrative to determine state implementation status. Without this information, the Department is unable effectively and consistently to monitor states' use of the funds and state progress in implementing the projects for which the funds were provided.

During the past years, significant amount of SBR funding has been provided to states to support the implementation projects targeted to improve program integrity and performance; support states' information technology (IT) system modernization efforts; enhance reemployment activities such as conducting reemployment and eligibility assessments; and activities related to preventing worker misclassification. The Department expects the timely implementation of these projects to impact the overall performance of the UI program. Providing the implementation status information on an annual basis rather than quarterly as proposed would not allow adequate time for the Department to offer technical assistance on projects if necessary to achieve implementation deadlines.

Furthermore, unlike burden on businesses or individuals, states are funded to collect and report data through their annual UI administrative grant.

7. **5 CFR 1320.5.** The collection is consistent with 5 CFR 1320.5.
8. **Public Engagement.** In accordance with the Paperwork Reduction Act of 1995, the public was given an opportunity to review and comment through the Federal Register Process on April 29, 2014 (79 FR 24012), No comments were received.
9. **Payment to Respondents.** There are no payments made to respondents.
10. **Confidentiality.** The ETA 9165 reports contain no personal or private data.
11. **Sensitive Questions.** There are no questions of a sensitive nature.
12. **Burden Hours.** All states will provide this report on a quarterly basis. Based on previous experience and consultations with State Workforce Agency (SWA) personnel, it is estimated at that it will take state agencies a total of 1,590 hours the first year to provide this information through the planned reporting format. The Department anticipates that states will require 10 hours per response for the first two quarterly reports, accounting for the initial manual entry of information for new grants (first quarter) and existing grants (second quarter) into the ETA 9165.

For the first quarter that the ETA 9165 report is due, the states will report on all activities funded under UIPLs No. 28-12, No. 10-14, No. 13-14, No. 13-14 Change 1, and No. 18-14. In the second quarter that the ETA 9165 report is due, the states will provide updates

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to the previous quarterly reports, and submit new reports on any ongoing core, Reemployment Eligibility Assessments (REAs), or consortium SBR projects not yet completed and funded under previous UIPLs issued in FYs 2011, 2012 and 2013. The grant award letter in each fiscal year identifies the projects that are core, REA, or consortium SBR projects. For SBRs provided to state consortia for IT modernization projects, the lead state is expected to provide the status report on behalf of the partner states.

In addition, ETA may request that a state complete an ETA 9165 report for individual projects categorized as incentive, focus, or optional strategies in FYs 2011, 2012, and 2013. An ETA Federal Project Officer will notify the state if a report is requested for one of these ongoing projects and the state will include the report as part of the next quarter's submission. In future years, the reporting requirements will apply to all SBR projects funded including any incentive, focus, or optional strategies.

Please ensure that a unique document is provided for reporting on projects funded under each UIPL. Based on an analysis of the first quarter report, ETA has awarded grants to implement an average of 7 projects to states. For example: a state is implementing four projects under UIPL No. 13-14 and one ongoing core project under UIPL No. 18-12. In the first quarter that the ETA 9165 is due, the state will submit one report to include the status on each of the four projects funded under UIPL No. 13-14. In the second quarter, the state will update the first report provided earlier and will submit one new report to include the status of the core activity funded under UIPL No. 18-12. The state will continue to submit updates for both these reports in each ensuing quarter until the projects are completed.

The Department also anticipates this workload will be reduced to 5 hours per response for future quarters as the reports are updated and maintained, and existing projects are completed. For future years, therefore, the annual burden hours will total 1,060. The specific detail is broken out below:

53 estimated respondents x first two reports/year x 10.00 hour = 1,060 burden hours.

53 estimated respondents x future quarterly reports/year x 5.00 hour = 530 burden hours.

First year: 1,590 burden hours
Ensuing years: 1,060 burden hours

Total burden per state, first year: 30 hours
Total burden per state, future years: 20 hours

Three year average for this submission: $1,590 + 1,060 + 1,060 = 3,710$ hours divided by 3 years = 1,237 hours annually.

Based on budget allocations, a figure of \$42.09 was derived for the average hourly wage of state agency staff for fiscal year 2014. Using \$42.09, the three year average cost for all respondents having to do this collection is computed as follows:

1,590 first year burden hours x \$42.09 per hour = \$66,923
1,060 ensuing years burden hours x \$42.09 per hour = \$44,615

Three year average cost for this submission: \$66,923 + \$44,615 + \$44,615 = \$156,153
divided by 3 years = \$52,051 in annual costs.

The DOL notes that, like all other reporting for Unemployment Insurance, the ETA allocates funds to states from ETA for administration of the UI program; therefore, this information collection would not impose an unfunded mandate.

13. **Burden Costs.** This information collection entails no additional burdens beyond the value of a respondent's time.
14. **Federal Annualized Costs.** States will email this report quarterly to the regional office; staff will upload it into the Department's existing grants management system along with many other reports. Annual Federal costs represent the time it takes regional staff to receive, analyze, and report and store the data. These costs are summarized as follows:

Regional office time: 2 hours per state x 9 states per region (avg.) = 18 hours per quarter
18 hours per quarter x 4 quarters x 6 regions = 432 hours annually
National office time: 1 hour per state x 9 states per region (avg.) = 9 hours per quarter
9 hours per quarter x 4 quarters x 6 regions = 216 hours annually
432 regional hours + 216 national hours = 648 total hours annually

Total annual cost:
Regional office: \$38.12 per hour x 432 hours = \$16,467.84. (Wage rate: [Office of Personnel Management Salary Table 2015-RUS: GS-12, Step 5 hourly rate](#)).
National office: \$41.48 per hour x 216 hours = \$9,002.88. (Wage rate: [Office of Personnel Management Salary Table 2015-DCB: GS-12, Step 5 hourly rate](#)).
Grand Total: \$25,470.72 (\$16,467.84 + \$9,002.88).
15. **Changes in Burden.** This is a new information collection.
16. **Publication.** Results such as those related to states' status on program integrity projects will be published on a Web site operated and maintained by the Department (<http://www.dol.gov/dol/maps/map-ipia.htm>). This site provides the status of each state's progress in implementing the integrity strategies identified in the Department's strategic plan, noting if a plan is in place to implement the strategy and rating the strategy implementation as complete, on track, or not on track.

The data collection will be used internally by ETA to track the implementation progress made by the states on these projects, to assess the impact of these implementations on program operations and performance, and to develop effective technical assistance to aid state implementation of the projects.

17. **Display of OMB Approval and Expiration.** The OMB control number and expiration date will be displayed on the ETA-9165. A menu option has 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.
18. **Certification Exceptions.** There are no exceptions.

Part B Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.