

Supporting Statement
Distribution of Characteristics of the Insured Unemployed, ETA Form 203
OMB CONTROL NO. 1205-0009

A. Justification.

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

The ETA 203, Distribution of Characteristics of the Insured Unemployed, is a once a month snapshot of the demographic composition of the claimant population. It is based in each state on the universe or a sample of those who file a claim in the week containing the 19th of the month, which reflects unemployment experienced during the week containing the 12th. This corresponds with the Current Population Survey sample week used by the Bureau of Labor Statistics (BLS). Aggregate data is collected on the items gender, race/ethnic group, age, industry, and occupation.

This report serves a variety of socio-economic needs at both the state and National offices because it provides the only demographic information on the insured unemployed. Among the needs served are promoting employment opportunities, improving utilization of manpower resources, evaluation of the unemployment insurance (UI) program and projecting workloads and budgets. These areas can be tracked not just nationally but on a state-by-state basis. Though always necessary, this report becomes particularly useful during economic downturns when interest in the composition of the insured unemployed is particularly high.

Social Security Act section 303(a)(6) authorizes this data collection.

2. *Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

The information is collected by state agencies based on a universe or a sample of those filing claims in the week containing the 19th of the month. The data is used by the Department of Labor for actuarial estimating, research and general information. The information is also used by those outside the Department such as Congressional staff, Congressional Budget Office, Federal Reserve Banks, Office of Management and Budget, and university and private researchers such as AFL-CIO and Urban League. If

this data collection were not conducted, there would be no information on the demographics of unemployment insurance claimants for any of the uses cited above.

3. *Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

This report is highly computerized in states and electronically submitted to the National Office. States are encouraged to use any automation that will make their job easier.

4. *Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

There is no duplication. The Benefit Accuracy Measurement (BAM) program (1205-0245) receives information on the demographics of a sample of recipients of unemployment compensation. The ETA 203 report contains the demographics of the insured unemployed; some will become recipients and some will not. The insured unemployment rate is often compared to the total unemployment rate. Likewise, the demographics of the insured unemployed are often compared to the demographics of the total unemployed so that the BAM population is not appropriate.

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

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

6. *Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

There is no other source of reliable demographic information on this population. One sample week in the quarter does not accurately reflect the quarter and gives fewer data points to track trends. Only one comparison in each quarter can be made to the BLS total unemployment data rather than three. This report is generally automated in state workforce agencies so there is little extra burden to report three times a quarter rather than just once.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner:*

The collection is consistent with 5 CFR 1320.5. except that monthly frequency is requested based on 6 above.

8. *If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.*

Describe 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

As required by 5 CFR 1320.8(d), ETA solicited comments on the proposed extension of approval for the ETA 203 through publication in the Federal Register May 13,2015 (80 FR.27350). No comments were received.

9. *Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.*

No payments or gifts have been provided to respondents.

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

The ETA 203 reports contain no personal or confidential data. The state level cross tabulations of the data collected does not allow for the identification of any specific individual claimant or business entity information.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

There are no questions of a sensitive nature.

12. *Provide estimates of the hour burden of the collection of information. The statement should:*

The procedures for completing the ETA 203 varies with the individual state agency, however all states include this report as a part of their data processing operations. Based on previous experience and ad hoc conversations with SESA personnel, it is estimated that it takes state agencies an average of 20 minutes to run a retrieval program, review the results, and enter the results into the electronic transmittal system. For those states that choose to download the data directly machine to machine, it should be even faster.

Burden Associated with Site Selection Activities Table

Activity	Respondents	Responses per Respondent	Total Number of Responses	Response Time (Hours)	Total Burden Hours	Time Value*	Monetized Burden Hours (Rounded to nearest \$)
Reporting of ETA 203	53	12	636	.333	212	\$44.69	\$9,474.28

***Source:** The hourly rate is computed by dividing the FY 2015 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_19-14_Attachment_I_Acc.pdf at 1) by the average number of hours worked in a year 1,711. For FY2015, this calculation was: \$76,461/1,711 = \$44.69.

ETA believes underlying records associated with reported data are byproducts of states administering the UI system and would be maintained by States as a routine business matter. When someone files for UI, the State collects a considerable amount of information about the claimant as part of the intake and eligibility review process that would exist in the absence of this collection.

13. *Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).*

None. This, and all other reporting for Unemployment Insurance, is paid for by the monies allocated to states for administration. There are no breakouts for specific reports. This is a well-established report so there are no startup costs.

14. *Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.*

ETA budgeted \$791,000 to operate and maintain the Unemployment Insurance Required Reports system. Including the subject 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 ($\$791,000 \text{ system cost} / 30 \text{ information collections}$).

15. *Explain the reasons for any program changes or adjustments reported on the burden worksheet.*

There are no changes made at this time.

16. *For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

Most data is given out or used in reports on a request basis.

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

ETA displays the OMB control number and expiration date on the ETA 203 hard copy form. A menu option has been incorporated into the UI electronic reporting system

which provides access to a complete listing of OMB approval numbers and current expiration dates for all required electronic reports, including the ETA 203.

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

There are no exceptions.

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methodologies.