

**SUPPORTING STATEMENT
REEMPLOYMENT SERVICES AND ELIGIBILITY ASSESSMENT (REA) REPORTS
OMB Control Number 1205-0456**

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.*

Extension for existing approved forms with revisions, ETA 9128 and ETA 9129: The name of the former Reemployment and Eligibility Assessment (REA) program changed in 2015 to the Reemployment Services and Eligibility Assessment (RESEA) program. This is a justification for the Department of Labor's (DOL) request to extend the information collection by State Workforce Agencies (SWAs) about the RESEAs they schedule with revisions. The Secretary's authority to implement this reporting requirement is found in the Social Security Act (SSA) section 303(a)(6), 42 U.S.C. 503 (a)(6), which requires that state law include provision for:

The making of such reports, in such form and containing such information, as the Secretary of Labor may from time-to-time require, and compliance with such provisions as the Secretary of Labor may from time- to-time find necessary to assure the correctness and verification of such reports.

The Secretary interprets section 303(a)(6), SSA, to authorize DOL to prescribe standard definitions, methods and procedures, and reporting requirements for the collection of information on benefit payment accuracy and the reemployment of UI benefit recipients and to ensure accuracy and verification of these data.

This information is needed to administer the RESEA program. It reflects the workloads that are funded and the outcomes that result both from selection in the program. OMB previously approved DOL's request that this data collection be approved and extended for three years through January 31, 2016.

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.*

DOL will use the information collected in ETA 9128 and ETA 9129 to: 1) evaluate state performance in terms of service delivery; and 2) report on the RESEAs, including the number of scheduled in-person reemployment services and eligibility assessments, the number of individuals who participated and the number who failed to appear for scheduled assessments, actions taken as a result of individuals not appearing for an assessment (e.g., benefits terminated), results of assessments (e.g., referred to reemployment services, found in compliance with program requirements), and average weeks to reemployment and average weeks of benefit payments.

The population served includes claimants who have been determined to be most likely to exhaust their benefits and veterans receiving Unemployment Compensation for Ex-Servicemembers (UCX). It is proposed that the population of claimants who are most likely to exhaust their benefits be reported on the ETA 9128 and the ETA 9129 and separate reports with the same data elements be provided for UCX claimants. These reports will be the ETA 9128 X and the ETA 9129 X.

Beginning in Calendar Year 2017, an additional change will be the elimination of the comparison group on the ETA 9129. Only information about the individuals selected for treatment will be collected. This eliminates fifty percent of the required data elements on this report; however it is the same data. The same data was collected for two different groups of individuals (those in the treatment group and those in a comparison group). This change is proposed because a comparison group is no longer required. One of the targeted populations are individuals who are determined likely to exhaust benefit and in need of services and they must be served in the order they were selected. The other targeted group includes UCX claimants. These two groups of claimants are generally considered to be in need reemployment services and these data collection will help USDOL assess how the program is working.

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 data reporting requirement uses automated procedures for data collection, transmission, and analysis that utilize state and Federal information processing technology. USDOL provides computers to each state and jurisdiction along with reporting software and a proprietary network to use to transmit data to the computers at the USDOL National Office.

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.

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

This collection does not impact small businesses.

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.*

Collecting this information less frequently than quarterly would not allow for adequate monitoring or evaluation of the impact of the reemployment services and eligibility assessments.

SWAs already report workload counts and outcomes to ETA each quarter and collecting this data less frequently would not materially diminish the burden of this data collection initiative.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the requirements of 5 CFR § 1320.5(c)(2)(i) through (viii).*

This ICR implicates no special circumstances.

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.

In accordance with the Paperwork Reduction Act of 1995, the public was given an opportunity to review and comment through a notice in the *Federal Register* on June 7, 2015 (80 FR 38748). 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 are made to respondents.

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

There are no issues of confidentiality as no personal data on individual claimants is provided to ETA as part of this collection. ETA maintains strict controls over the data gathered through the UI reporting system. ETA does not receive any data on individual claimants from states as a requirement of this data collection. Only aggregate data describing activity for all claimants are reported to DOL.

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.

No questions of a sensitive nature are included.

12. *Provide estimates of the hour burden of the collection of information. The statement should:*
- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*
 - * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.*
 - * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "Annual Cost to Federal Government."*

The following table can be used as a guide to calculate the total burden of an information collection.

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
ETA 9128	49	4	196	0.5	98	\$47.20	\$4,625.60
ETA 9128 X	49	4	196	0.5	98	\$47.20	\$4,625.60
ETA 9129	49	4	196	0.5	98	\$47.20	\$4,625.60
ETA 9129 X	49	4	196	0.5	98	\$47.20	\$4625.60
Unduplicated Totals	49		784		392		\$18,502.40

**Source: The hourly rate is computed by dividing the FY 2016 national average personal services/personal benefits (PS/PB) annual rate for state staff as provided for through the distribution of state UI administrative grants (http://wdr.doleta.gov/directives/attach/UIPL/UIPL_21-15.pdf) by the average number of hours worked in a year, 1,711. For FY2016, this calculation was: \$80,756 / 1,711 = \$47.20.*

The original submittal was made when the program was implemented and it is envisioned that eventually all 53 SWAs will participate. During Federal fiscal year 2016, 49 states will be participating in the RESEA program.

The total burden comprises SWA activities related to assembling automated record system files, conducting automated cross matches of these files, and electronically reporting the results to DOL. Estimates of the burden follow, based on the fact that ETA awarded REA grants to states during fiscal year 2012, according to the availability of appropriated funds.

The new ETA 9128 X and the new 9129 X provide separate data for UCX claimants selected for an RESEs. ETA estimates that it will take the same amount of time for states to complete the ETA 9128, the ETA 9219, the ETA 9218 X and the ETA 9129 X: 30 minutes for each form or .5 hours. These data are already being collected and reported to USDOL. The UCX data will now be broken out from the UI data. These data are already being collected and reported to USDOL. The UCX data will now be broken out from the UI data as a way to identify the program type. A one-time cost for programming to breakout these program types would be about \$10,000 per state (53 x 10,000 = \$530,000). There is no expected change in the burden for the 9129 report (see attached facsimile) although beginning in calendar year 2017, for one group (the comparison group) the data will no longer be needed since the requirement to have comparison groups for the RESEA program goes away as of January 1, 2017.

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).*

There are no annualized costs to respondents.

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

The changes in burden reflect the fact that each state makes an individual decision in each year regarding their participation in the REA program. As a result, the number of reports we anticipate will change with the number of states participating. The change from 42 states to 49 states participating produces a very small increase in overall expected burden. The breakout of reports for UCX claimants will double the burden for each participating state. These reports are automated and the program will simply record the data for the correct population in the ETA 9218 and the ETA 9129 for claimants who are most likely to exhaust their benefits and the ETA 9128 X and the ETA 9129 X for UCX claimants.

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.*

Decisions on publication of data have not been made.

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

The expiration date for OMB approval will be displayed.

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. Collections of Information Employing Statistical Methods

This information collection does not employ statistical method his information collection does not employ statistical methods.