

SUPPORTING STATEMENT
UNEMPLOYMENT INSURANCE CALL CENTER FINAL ASSESSMENT GUIDE
OMB CONTROL NO. 1205-0NEW

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.***

Under section 303(a) of the Social Security Act (SSA), the U.S. Department of Labor (Department) has oversight responsibility for the Federal/State Unemployment Insurance (UI) Program. Section 303(a)(6), SSA, specifically provides the authority to require states to make reports, containing such information and in such form, as the Secretary of Labor may from time to time require.

The Department's Employment and Training Administration (ETA) is charged with conducting this oversight responsibility. Since the 1990s, state workforce agencies (SWAs) have increasingly relied on the use of telephonic call centers to interact with and to provide services to their customers in the UI program. ETA has not previously conducted a specific study of the states' use of this technology and the service delivery model(s) relied on by many of its grantee states.

ETA proposes to conduct a comprehensive study of UI call center operations by collecting data "to understand key operational challenges and issues in light of the Administration's policy priorities and of other partner programs." ETA has contracted with Coffey Consulting, LLC, to conduct the survey and prepare a comprehensive study (analysis and report) of state UI call center operations in order to allow ETA to better understand the role of call centers in the administration of the UI program, to identify successful practices, and to identify how states measure call center performance. The overall project is being carried out in two phases with the first phase consisting of an online survey, which was approved under the quick turnaround generic Information Collection Request (ICR), OMB Control No. 1205-0436, ICR Reference Number 201308-1205-009, *Quick Turnaround Surveys on Workforce Investment Act (WIA) Implementation*. The first phase online survey has been completed.

To continue the second phase of this research effort, ETA seeks approval to conduct telephone interviews of UI SWA Administrators/Directors. The interviews are intended to gather detailed documentation of how states operate their UI call centers, as well as gather information on how existing state UI call centers' successful practices and measurable performances are used. The summary information, and information about successful practices, will be made available to all states to aid in improving their own call center operations. The interviews will focus in detail on how UI call centers are operated in all 53 SWAs. Interview questions will cover topics including: technologies used for

various UI call center functions; the different UI program functions performed at the call center; the performance metrics utilized in UI call centers; staffing and workload contingency plans.

- 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.***

Coffey Consulting, LLC, will develop a comprehensive analysis report for ETA to utilize in identifying successful practices used in the SWA's UI Call Centers. Through this collection and subsequent report, ETA will gain insightful knowledge on each SWA's Call Center operations and will be able to better understand the challenges each SWA faces in maintaining performance standards and customer service levels expected when operating unemployment insurance programs.

- 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.***

Coffey Consulting, LLC, will conduct the interviews via telephone conversations. These telephone conversations will provide a more organic discussion, which will lead to a more comprehensive understanding of each state's successful practices and of each state's technical and operational challenges.

- 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.***

Duplication is not an issue. ETA has not previously studied in detail the SWAs' use of call centers to support their UI program operations. UI call centers are a product of emerging technology in the 1990s and have been adapted to perform additional operational functions during the Great Recession in order to meet the customer demands of the unemployment insurance program.

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

The collection of information does not involve small businesses or other small entities. Data collection and report submittal is by state agencies only.

- 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.***

The consequences of not collecting this information would prevent SWAs and ETA from gaining valuable information on UI call center operations in the various states and to identify and share successful practices that may improve customer service.

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

The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

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), the public was given a sixty day opportunity to review and comment on the Federal Register publication dated July 2, 2015, (80 FR 38233). One comment was received from the American Federation of State, County and Municipal Employees (AFSCME) union. They supported the survey and suggested an additional five questions. ETA responded to AFSCME and indicated the questions would not be added to this survey. One of the questions was already previously addressed in the first phase of this project (the quick-turnaround survey). Three of the questions deal more with the State Workforce Agencies' process management and are not appropriate for this ICR. The final question would have placed an undue burden on the states to facilitate a response.

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

No payment or gift has 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 UI Call Center interviews contain no personal or confidential data. State Workforce Agencies are identified by name on the documentation of the interviews and no personal information will be collected regarding UI Call Center Operations. No assurance of confidentiality is provided in the requirements covered by this request.

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.

The UI Call Center interviews collect no information considered sensitive as described under the instructions for this section.

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

The collection of the telephone interviews for UI Call Center Operations is a one-time occurrence, which will be used as part of the study that Coffey Consulting, LLC, is conducting on behalf of the Department of Labor. Each of the 53 SWAs will respond one time to the telephone interview. The total amount of time estimated per response is 2.5 hours.

Type of Respondent – Activity	Number of Respondents	Number of Responses per Respondent (Frequency)	Total Number of Responses	Response Time per Response (in hours)	Total Burden Hours	Time Value	Monetized Burden Hours Rounded to nearest \$)
Telephone Interviews with SWAs	53	1	53	2.5	132.5	\$47.20	\$6,254

*Source: The hourly rate is computed by dividing the FY 2016 national average PS/PB annual salary for state staff as provided for 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.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no additional cost burdens to respondents or record keepers resulting from the collection of information. As noted in the response to #12, the telephone interviews are a one-time occurrence.

- 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.**

The cost to the Federal government is included in the contract with Coffey Consulting, LLC. The percentage of the work to conduct the telephone interviews according to Coffey's initial cost estimate worksheet was 20 percent of the total contract cost. The total contract cost with Coffey Consulting, LLC, is \$219,742.73. Twenty percent of this cost to conduct the telephone interviews is \$43,948.546.

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

This is a new information collection request. 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.**

The scheduling of telephone calls to collect this information will begin promptly after OMB approval of the collection is received. The time schedule to collect the information, complete the report and publish the final report according to Coffey Consulting, LLC, is estimated to be six months from the date that OMB approval is received. Coffey estimated this final report would be 31 percent of the cost of the contract in their initial cost estimates. This equals \$68,120.25.

- 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 will display the expiration date.

- 18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions" (5 CFR 1320.9).**

There are no exceptions.

B. Collection of Information Employing Statistical Methods.

Statistical methods are not used in the collection of UI Call Center Operations information via telephone interviews with SWAs.