

Supporting Statement
Form ETA 191, Statement of Expenditures and Financial Adjustments of Federal Funds
for Unemployment Compensation for
Federal Employees and Ex-Service members (UCFE/UCX)
OMB Control No. 1205-0162

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.*

Public Law 97-362, Miscellaneous Revenue Act of 1982 amended the UCX law (5 U.S.C. 8509) and Public Law 96-499, Omnibus Reconciliation Act, amended the UCFE law (5 U.S.C. 8501, et. Seq.) to require each Federal employing agency to pay the costs of regular and extended UCFE/UCX benefits paid to its employees by the State Workforce Agencies (SWAs).

By submittal of Form ETA-191 each quarter, SWAs will show the amount of benefits that should be charged to each Federal employing agency. ETA will aggregate the quarterly charges reported on the Form ETA 191 and submit an official bill (showing all States' charges) to each Federal agency that is being charged. Federal agencies will reimburse the Federal Employees Compensation (FEC) Account, maintained by the U.S. Department of the Treasury. This collection is authorized by the Social Security Act, Section 303 (a) (6).

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.*

This report is used by ETA to bill Federal and military agencies for costs incurred by SWAs in paying unemployment insurance benefits to the employees of these agencies. Each SWAs reports to ETA benefit charges by Federal/military agencies. These charges are aggregated for each agency and billed to the individual agencies. Without this data, ETA could not bill these agencies separately as required in the laws cited in section A1. If ETA were unable to bill these Federal and military agencies, such agencies would be unable to reimburse the FEC Account. This would further result in the account not having available resources to cover UCFE and UCX benefit payments.

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.*

The ETA 191 is an electronic form and the data is currently transmitted electronically from the state level to the 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.*

This information is not available elsewhere.

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

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.*

This collection is quarterly. Less frequent reports will result in less frequent reimbursements to the FEC Account which may result in insufficient funds being available to pay unemployment benefits to Federal claimants and Ex-Servicemembers.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner needing explanation under 5 CFR 1320.5(d)(2):*

Collection is consistent with 5 CFR 1320.5(d)(2).

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 the approval for the ETA 191 through publication in the Federal Register on August 26, 2015 (80 FR 51843). No public comments were received.

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

There is no remuneration to respondents other than the usual payment to states to operate the program.

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

There is no assurance 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. 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 and cost burdens of the collection of information.*

The average estimated response time for a single report is 6 hours. The report is submitted by 53 state workforce agencies at a quarterly frequency. We estimate the aggregate burden to be:

$(53 \text{ respondents}) \times (4 \text{ reports/year}) \times (6 \text{ hours per report}) = 1,272 \text{ burden hours.}$

The OMB burden disclosure statement currently appears on the ETA 191. The Federal government pays the salaries of the state staff which, at \$47.20 per hour, produces an estimated cost is \$60,038.40. This figure is based on the FY 2016 average salary for SWA staff. However, the Federal government pays the salaries of the state staff, so there is no direct cost to the state.

Estimated Total Annualized Respondent Burden Hours and Costs

Activity	Number of Respondents	Response Frequency	Total Annual Responses	Time Per Response (In Hrs.)	Total Annual Burden Hours	Wage Rate*	Monetized Value of Respondent Time
Form ETA-191	53	4	212	6	1,272	47.20	60,038.40
Unduplicated Totals			212		1,272		60,038.40

*Source: The hourly rate is computed by dividing the FY 2016 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_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. (Do not include the cost of any hour burden already reflected on the burden worksheet).*

There are no other costs other than their time as described in section A12 above.

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 ETA 191 data is submitted electronically by states and stored on Department of Labor computer systems along with many other reports. There are no direct additional Federal Costs in processing this report. 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.*

There is no change in burden.

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.*

This information is not published.

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 OMB control number and expiration date on the ETA 191. In addition, a listing of current OMB control numbers and expiration dates is displayed within the online reporting system. 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. Collection of Information Employing Statistical Methods.

Statistical methods are not used in the collection of ETA 191 information.