Supporting Statement Worker Profiling and Reemployment Services Activity and Worker Profiling and Reemployment Services Outcomes OMB Control No. 1205-0353

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 (PL) 103-152 amended the Social Security Act by adding section 503(j). This more recent law also created the WPRS program and mandated that Unemployment Insurance (UI) claimants who are determined likely to use up all of their benefits must participate in reemployment services as a condition of their eligibility to receive benefits. These reports are necessary for Employment and Training Administration (ETA) staff to have adequate oversight of state program activities and to ensure that program objectives and requirements are being met.

The WPRS program was established to identify, as early as possible in the claims series, those claimants who are likely to exhaust their benefits. The goal is to provide the reemployment services that would be most helpful to the claimant as soon as possible. Statistical models or characteristic screens are employed to identify those claimants who are most likely to exhaust benefits. This identification process allows states to target scarce reemployment service resources to those most in need.

This submission seeks to extend the OMB clearance for two reports the: 1) ETA 9048, Worker Profiling and Reemployment Services Activity Report and 2) ETA 9049, Worker Profiling and Reemployment Services Outcomes Report. The ETA 9048 report provides information on the basic quarterly activities of the WPRS program, reemployment activities for UI claimants who are likely to exhaust their benefits. The report tracks WPRS claimants from the time they are profiled through the delivery of services. The ETA 9049 report provides information about reemployment outcomes for participants in the WPRS program.

Social Security Act sections 503(a) and (j) authorize this information collection. See 42 U.S.C. § 503(a), (j).

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.

These reports provide counts of services and outcome measures for those served by the states and are used to monitor the program. The data uses counts of reemployment

services and the subsequent wage records of WPRS participants to analyze the effectiveness of the reemployment services intervention. Thus, states may make adjustments in their programs to make them more effective. Section 4(a), paragraph C of PL 103-152 requires that states collect information for purposes of improving their methodology of identification. The ETA 9048 report is the count of activities of WPRS claimants and the ETA 9049 is a report of wage records after claimants have received services. These reports track the reemployment services provided to claimants and the successes of referred claimants.

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.

States have been encouraged to automate the WPRS process as much as possible. Selection of participants, feedback from the service providers, and searches of wage records for reemployment outcomes are all automated processes. States establish agreements with service providers to obtain necessary WPRS data about the services provided. All reporting is done electronically through an automated reporting interface that states use for the submission of all UI-related data.

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 as there is no other source of data that captures the impacts of the reemployment services provided through the WPRS program. ETA has other information collections that describe reemployment services such as the Labor Exchange Reporting System (OMB number 1205-0240) but this collection describes all reemployment services provided, and does not provide adequate description of the specific population served by the WPRS program.

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 would not allow for monitoring changes, nor evaluation of the impact or effectiveness of various reemployment services over time.

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

Collection is consistent with 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.

In accordance with the Paperwork Reduction Act of 1995, the public was allowed 60 days to review and comment through the Federal Register Notice posted on September 28, 2015 (80 FR 58300). No public comments were received.

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

No payment or gifts were provided to respondents.

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

There is no personally identifiable information collected on the ETA 9048 or 9049. Data collected is aggregate for all program participants and contains no information on any one specific individual. States have no expectation of confidentiality for the data they submit to ETA and the public burden statement reflects this.

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 contained on this report.

12. Provide estimates of the hour burden of the collection of information.

Respondents are the 53 State Workforce Agencies (SWAs). Annual costs are:

ETA 9048: 53 SWAs X .25 hrs. X 4 report submittals per year = 53 hrs. ETA 9049: 53 SWAs X .25 hrs. X 4 report submittals per year = 53 hrs.

TOTAL ONGOING BURDEN

106 hrs. per year.

<u>Record Keeping:</u> States maintain electronic records on all claimant activities. The burden on record keeping for the particular activities is estimated to be six minutes per claimant. Therefore, the estimated annual data burden for record keeping would be:

53 SWAs x 6 min. transaction x 25,335 submittals = 134,276 hrs. per year

<u>3rd Party Disclosures:</u> Based on data for claimants who received reemployment service during CY 2015 the average estimated burden on claimants per referral is two hours. Therefore, the estimated burden on claimants to receive required reemployment service is:

973,684 claimants x 2 hrs. per claim x 1 annual response = 1,947,368 hrs.

Burden Summary Table

Activit y	_	Annual Frequency	Total Annual Responses		Total Annual Burden (Hours)	Rate*	Monetized Value of Respondent Time
ETA 9048	53	4	212	.25 hr.	53	47.20	2,502
ETA 9049	53	4	212	.25 hr.	53	47.20	2,502
Record Keepin	53	25,335	1,342,755	6 min.	134,276	47.20	6,337,827
3 rd Party Disclos ure	973,684	1	973,684	2 hr.	1,947,368	47.20	91,915,770
Undup. Totals	973,843		2,316,863		2,081,750	\$47.20	98,258,601

^{*}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).

This, and all other routine reporting for Unemployment Insurance, is paid for by monies allocated to states for administration. There are no breakouts for specific reports. This is a well established report so there are not start-up 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.

There is no cost to the Federal government.

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

There are no program changes to be made at this time. Estimates have been updated based on recent data and trends from calendar year 2015 showing state providing services through the Reemployment Services and Eligibility Assessment (RESEA) program. Some states are transitioning from the WPRS program services to RESEA services.

Note: This ICR reconciles a previous inadvertent inconsistency in how the supporting statement and ROCIS entries treated burden for Forms ETA-9048 and ETA-9049. Previously the data entry suggested one single 30-minute response per state. This ICR counts two 15-minute responses, one for each form, per state. Also, the burden changes were corrected and moved from the discretionary column to the estimate column.

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.

Data collected from states is a matter of public record and is made available on the ETA web site at the following address: http://ows.doleta.gov/unemploy/profile.asp

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.

The OMB inventory number and expiration date will be displayed on the bottom of all report facsimiles.

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

This collection does not employ statistical methods.