

SUPPORTING STATEMENT
DISASTER UNEMPLOYMENT ASSISTANCE ACTIVITIES REPORT
OMB Control No. 1205-0051

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 100-707 (Sections 410 and 423 of The Robert T. Stafford Disaster Relief and Emergency Assistance Act [the Stafford Act]) provides for assistance to eligible individuals who are unemployed due to a major disaster. State Workforce Agencies through individual agreements with the Secretary of Labor (Secretary), act as agents of the Federal government in providing Disaster Unemployment Assistance (DUA) to eligible applicants who are unemployed as a direct result of a major disaster.

The ETA 902 is a monthly report submitted by the states on DUA program activities once a disaster is declared by the President.

ETA 902 is prescribed by the Secretary under 20 CFR 625.8 and 625.9 and is necessary for oversight of the DUA program. Collection is authorized under Section 303(a)(6) of the SSA.

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 ETA 902 report includes information on the number of claimants who filed for DUA, including self employed individuals; number of claimants denied DUA benefits; the amount of DUA benefits paid; the number of appeals filed; and the number of overpayments issued. The report is also used to monitor state agency expenditures and to support requests for additional administrative funds from the Federal Emergency Management Agency (FEMA) within the Department of Homeland Security (DHS), which provides the funds for administration and benefits for the DUA program. A copy of this report is attached.

The data allows Employment and Training Administration's Office of Unemployment Insurance (OUI) to do comparative analyses of states' performance and to monitor the impact of the disaster and properly manage the resulting financial accountability.

If these data were not available, OUI would not have sufficient information to monitor and assess states' performance in administering the DUA program and related activities. Any attempts to identify risks to the program or resolve potential problems would be greatly hindered.

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 bias for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

The states are continually improving program operations and their information handling technologies and, where feasible, new methods are used for taking applications, and collecting and transmitting the data for these reports. For example, many states have implemented automated remote claims-taking systems, and automated recordkeeping. Reduction of burden through increased automation is always encouraged and supported. As with most unemployment insurance (UI) reports, the ETA 902 report is part of an electronic reporting system through which state UI agencies enter the data on a monthly basis and transmit the data to the ETA 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.*

FEMA/DHS has delegated authority to the Department of Labor for the DUA program. Neither FEMA nor any other agency collects information prescribed on the ETA 902 report. The data requested are not available from any other source. Therefore, there is no duplication in the information being requested.

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

The information collection does not involve small businesses 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.*

The ETA 902 report is due monthly when a disaster makes submittal of the report necessary. If these data were collected less frequently, ETA's ability to carry out its oversight responsibilities, document disaster impacts, and monitor program effectiveness would be greatly weakened. The funding needs projections would be more unpredictable. Effective accounting of DUA payments and other DUA expenditures would also be hindered. Claimants must certify for DUA on a weekly or bi-weekly basis, which coincides with the frequency required for regular unemployment insurance benefits. The monthly ETA 902 data collection allows the Department of Labor to assess the overall impact and effectiveness of the DUA program(s) administered by the states.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5.*

There are 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 allowed 60 days to comment through the Federal Register Notice posted on May 23, 2017 (82 FR 23602). 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 gift is provided to respondents, other than remuneration of contractors or grantees.

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

The ETA 902 report does not identify individuals receiving benefits by name or social security number. Respondents have no expectation 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 items to be completed on the forms which involve sensitive information of a private nature or otherwise.

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

Time Estimate

On average, there are approximately 50 presidentially declared disasters each year nationwide occurring in about 30 states and about 30 of these disasters include DUA. Approximately 6 ETA 902 monthly activity reports are submitted per disaster that includes DUA. Estimated average response time for a single report is one (1) hour, and the agency assumes for purposes of this estimate that the average disaster lasts six months from the date of declaration. There is also a final report submitted for each disaster activity, which averages one (1) hour for preparation of the report. Specific breakout of burden hours is as following:

- *Reporting of 902: 30 state disaster declarations x 6 reports per year x 1 hour p/report = 180 hours annually.*
- *Reporting of Final Report: 30 state disaster declarations x 1 Final Reports per year x 1 hour per report = 30 hours annually.*

Total annual estimated burden hours = 210

Respondent Time Value Estimate

- *210 x \$48.75 per hour = \$ 10,237.50 (annualized cost).*

Total annual time burden: ETA 902 (210 hours) Total annual cost burden: ETA 902 (\$10,237.50).

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

Program Type	Number of Respondents	Annual Frequency	Total Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Regular	30	6	180	1	180	\$48.75	\$8,775.00
Final Report	30	1	30	1	30	\$48.75	\$1,462.50
Unduplicated Totals		//////////	210	//////////	210		\$10,237.50

*Source: The hourly rate is computed by dividing the FY 2018 national average PS/PB annual salary for state staff as provided for through the distribution of state UI administrative grants by the average number of hours worked in a year (1,711). For FY2018, this calculation is: \$83,406 / 1,711= \$48.75 (https://wdr.doleta.gov/directives/attach/UIPL/UIPL_17-17.pdf).

13. *Provide an estimate of 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 shown in Items 12 and 14).*

There are no other costs associated with this collection of information.

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.*

Federal Burden for Data Collection: ETA 902.

Annual Burden Hours: 105 hours (average 30 minutes per report).

Estimated Annual Salary Cost to Review Data: \$4,569.60.

Note: The estimated cost is based upon the annual salary for a Washington, DC based GS-13, Step 1 at \$43.52 per hour. (See Office of Personnel Management Salary Table 2016-GS, <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/salhl.pdf>). $\$43.52 \times 105 \text{ hours} = \$4,569.60$.

The data is received and stored on Department owned computer equipment along with all other Unemployment Insurance Reports data.

Although no staff is required to process this report, during FY2017, ETA has budgeted \$965,920.33 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 \$32,197.34 ($\$965,920.33 \text{ system cost} / 30 \text{ information collections}$).

Total Federal costs are estimated to be \$36,766.94 ($\$4,569.60 + \$32,197.34 = \$36,766.94$).

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

There are no changes to the burden hours.

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.*

There are no plans to publish the data for statistical use.

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 number and expiration date will be displayed as part of the Handbook instructions for the ETA 902 report.

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

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.