

General Inquiries to State Agency Contacts Supporting Statement

Part A. Justification

1. Circumstances necessitating data collection

The Bureau of Labor Statistics (BLS) awards funds to State agencies in the 50 States, the District of Columbia, Puerto Rico, Guam, and the Virgin Islands (hereinafter referred to as the “States”) for the operation of the Labor Market Information (LMI) and/or Occupational Safety and Health Statistics (OSHS) Federal/State cooperative statistical programs, which themselves have been approved by OMB separately, as follows:

Current Employment Statistics (CES)	1220-0011
Local Area Unemployment Statistics (LAUS)	1220-0017
Occupational Employment Statistics (OES)	1220-0042
Quarterly Census of Employment and Wages (QCEW or ES-202)	1220-0012
Annual Refiling Survey (ARS)	1220-0032
Labor Market Information (LMI) Cooperative Agreement	1220-0079
Multiple Worksite Report (MWR)	1220-0134
Annual Survey of Occupational Injuries and Illnesses (SOII)	1220-0045
Census of Fatal Occupational Injuries (CFOI)	1220-0133
BLS/OSHS Federal/State Cooperative Agreement	1220-0149

(This list of BLS/State cooperative statistical programs may change over time.)

The Labor Market Information (LMI) Cooperative Agreement (CA)(1220-0079) and Occupational Safety and Health Statistics (OSHS)(1220-0149) CA packages are the vehicles through which State Grant Agencies (SGAs) are awarded funds. The CA packages include application instructions and materials, as well as financial reporting, closeout and other administrative requirements, as spelled out in Title 2 Part 200 of the Code of Federal Regulations (hereinafter cited as 2 CFR 200), *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, and as published by the Department of Labor in Title 2 Part 2900. Federal Assistance is encouraged by Public Law 91-596, the Occupational Safety and Health Act.

To ensure the timely flow of information and to be able to evaluate and improve BLS/State cooperative programs’ management and operations, it is necessary to conduct ongoing communications between the BLS and its State partners. Whether information requests deal with program deliverables, program enhancements, operations, or administrative issues, questions and dialogue are crucial to the successful implementation of these programs.

In order to conduct these communications, the BLS is requesting OMB approval of general inquiries, allowing dialogue between the BLS and its State partners. Due to the day-to-day and sometimes urgent nature of these information requests, these inquiries are conducted on

an ongoing basis. OMB agreed when this package was first submitted that the terms of clearance of this package would be: 1) if BLS is sending written requests to States under this clearance, the OMB control number and expiration date will be displayed somewhere on the request; and 2) if BLS makes an inquiry to more than nine States and estimates the response burden per State to be more than two hours, a copy of that inquiry will be forwarded to OMB. Inquiries that do not exceed nine States and two hours of burden per response will not have to be forwarded to OMB.

2. Purpose of data collection

Information collected under this clearance is used to support the administrative and programmatic needs of these joint BLS/State programs. Examples of types of requests are included in Attachment 1 – Examples of Inquiries to the States.

3. Use of improved information technology to reduce burden

The BLS primarily uses email or telephone contacts to collect information from the States. Written memoranda from the BLS to the States also are used to request information when appropriate. Many of the requests are made to address time-critical issues where the use of formal information collection instruments is not practical.

4. Efforts to identify duplication

Information collected from the States by the BLS is unique to these Federal/State collections.

5. Minimizing small employer burden

Information is collected from governments of the 50 States, the District of Columbia, Puerto Rico, Guam, and the Virgin Islands. None of this information is collected from businesses.

6. Consequences of less frequent data collection

The BLS makes requests for information from the States to ensure that deliverables are provided on schedule and to identify and resolve any problems or issues encountered by the States and/or the BLS. Some of these requests are made on a scheduled basis and others are made when events or issues necessitate. Some are administrative in nature or may deal with estimation, benchmarking, training, conferences, updating information, program operations, etc.

7. Special circumstances relating to 5 CFR 1320.5

Some requests for information are made more frequently than quarterly and responses may be requested within fewer than 30 days. This is done when a quick turnaround time is appropriate to facilitate program operations.

8. Federal Register Notice and outside consultation

Federal Register notice

No comments were received as a result of the Federal Register notice published in 82 FR 58447 on December 12, 2017.

Consultation outside the agency

The BLS and the States communicate on an ongoing basis and meet periodically regarding the conduct of these statistical programs.

9. Payments to respondents

The States receive Federal domestic assistance provided under the BLS/State cooperative agreements.

10. Confidentiality provisions

Information collected under this clearance request generally is not confidential. The information typically is operational or administrative in nature. (Program-specific statistical data from respondents are treated in accordance with confidentiality provisions applicable to the respective programs. The confidentiality of those data is addressed in the clearance requests for those programs.)

11. Sensitive questions

There are no sensitive questions asked.

12. Estimated burden hours and costs

The burden hours for individual inquiries are variable. The frequency per State per program per year also is variable. There are 54 potential respondents, and the time required to complete an inquiry typically will vary from ten minutes to two hours. The total annual burden hours (15,927) and the total annual responses (23,890) requested in this clearance are based on BLS experience in administering the programs and are estimates of the maximums that would be required. For purposes of estimating burden, the agency average response time is 40 minutes. $23,890 \text{ responses} \times 40 \text{ minutes} = 15,927 \text{ hours}$.

Respondents to this information collection are state employees whose average fully loaded earnings are estimated to be \$48.06 per hour. (See Employer Costs for Employee Compensation (ECEC), a product of the National Compensation Survey at <http://www.bls.gov/news.release/pdf/ecec.pdf>.) The agency estimates the total value of respondent time to be \$765,451.62. $15,927 \text{ hours} \times \$48.06/\text{hour} = \$765,451.62$.

13. Costs resulting from information collection

The agency anticipates no additional costs to respondents or recordkeepers resulting from the information collection.

14. Estimated annual costs to the Federal government

None. This activity is an inherent aspect of the ongoing conduct of the BLS/State cooperative programs, which themselves have been cleared by OMB separately.

15. Changes in burden

There is no change in burden.

16. Plans for tabulation and publication

The information collected will not be used for publication but, rather, for program operation purposes, including carrying out BLS fiduciary responsibilities for managing and administering the funds appropriated for the BLS/State cooperative statistical programs.

17. Display of expiration date

BLS/State cooperative agreements under which these programs are conducted contain a notification paragraph explaining that the BLS will make inquiries to the States as needed to conduct the programs, and that those inquiries are covered under OMB Number 1220-0168.

18. Exception to certification statement

There are no exceptions to the certification statement.

B. Statistical Methods

Statistical methods are not used for this collection of information.