

Analysis of Alternative Strategies for Financing Unemployment Insurance (UI) Benefits When Trust Fund Balances Are Insufficient: Summary of Public Comments to 60-Day Notice and DOL Responses

In accordance with the Paperwork Reduction Act of 1995 (P.L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), DOL published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on December 11, 2017 (vol. 82, pp. 58219-58220) and provided a 60-day period for public comment.

During the notice and comment period, the government received comments from five entities, all of which are provided as part of this submission.

One of the responses was supportive of this effort and noted that a broader research effort is justified by having public officials at both the federal state levels armed with greater information than is currently available.

Three of the responses included concerns such as whether the state workforce agencies will benefit from the proposed research, whether this research is consistent with the existing Federal and State roles in UI administration, and whether this research would impinge on existing state freedom to finance trust fund shortfalls as they see fit. DOL appreciates these comments, but notes that the objectives for this project include building knowledge that will be useful to the field and for states as they make decisions. This study seeks to identify and compile information in a transparent way to build a body of evidence, to use rigorous methods in analyzing data and assessing information, and produce products that are relevant to states, Agency stakeholders, and to the field generally. Furthermore, while comments expressed concern about whether there was a need for this analysis, they did not identify or reference any prior work that would make this effort duplicative or unnecessary. The ICR, and the statement of work for the project state that "there is little research examining or comparing the methods available to states for financing UTF account deficits, and specifically lacking is comprehensive research that analyzes the cost differences between taking Federal loans and using alternate sources." Absent previously conducted, rigorous research on this topic area, it is challenging to conclude that this research is unnecessary and would not provide potential benefit.

Finally, one comment raises opposition to the study by raising concerns generally about unnecessary waste of government time and money.