

**SUPPORTING STATEMENT
RESOURCE JUSTIFICATION MODEL (RJM)
OMB Control Number 1205-0430**

A. Justification.

The Department of Labor, Employment and Training Administration (ETA) is renewing with revision for ETA Resource Justification Model (RJM). The automatic population of the PS/PB IT worksheet reduces the burden hours, see item #12 and 15.

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.*

The Secretary of Labor has a legal responsibility under the Social Security Act (SSA) Title III, Section 303(a)(1), for providing state agencies the necessary costs of proper and efficient administration of state unemployment insurance (UI) laws. The Secretary must establish a means of measuring state agencies' "proper and efficient administration" to certify payments to states. Among other duties, the Secretary must also ensure that state laws conform to Federal law, and that states comply with them, in order for subject employers within the state to be allowed to receive offset credit under the Federal Unemployment Tax Act.

In support of these responsibilities, SSA Title III, Section 303(a)(6) authorizes the Secretary to require of states the:

"...making of such reports in such form and containing such information, as the Secretary of Labor may from time to time require, and compliance with such provisions as the Secretary of Labor may from time to time find necessary to assure the correctness and verification of such reports."

The data collected through the RJM provide state specific work measurement factors, salary rates, and non personal service spending levels. The data also inform the national office of operating expenditure levels anticipated by state unemployment insurance programs.

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.*

Using the RJM, state agencies electronically submit detailed cost data in a structured format (spreadsheet file). The information specifies salary and benefit rates, workloads, processing times, and non-personal services dollars, which are used to inform ETA's administrative funding allocation process. Review and validation of the data by ETA Regional Offices is also an important part of the RJM.

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.*

State agencies enter, store, and e-mail their cost data in a spreadsheet file. The basis for using this means of collection is that formulae are built into the spreadsheets and make necessary calculations to reduce the amount of data input.

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.*

The RJM does not duplicate any existing ETA program. There is no similar information that is already available.

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

There is no impact on 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.*

Section 302(a) of the Social Security Act requires the Secretary of Labor to certify to the Secretary of the Treasury for payment to the states the amount of funds necessary for states to properly administer their unemployment insurance law. ETA relies on the RJM to obtain state specific, updated cost factors for use in that determination to ensure the Secretary fulfills this legal responsibility.

Either not conducting the RJM data collection or doing so less frequently would require ETA to rely on outdated information and would result in ETA being unable to make a strong case for needed resources to OMB and the Congress. ETA's ability to equitably allocate to states their share of the annual Congressional appropriation would also be negatively impacted.

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 that would cause this information to be collected in any manner listed above.

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 given 60 days to comment on the Federal Register Notice published on October 3, 2018 (83 FR 49953). 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 to respondents has been or will be provided.

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

Confidentiality is not an issue with this program, which simply involves collecting state agencies' financial data.

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.*

The data collection does not include questions of a sensitive nature.

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

The estimate of burden is an average figure. The hourly burden on respondents is expected to vary widely.

The federal government pays the salaries of the state staff so there is no direct cost to the states.

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

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Crosswalk	53	1	53	94.5	5,009	\$49.94	\$250,149
Account Summary	53	1	53	4	212	\$49.94	\$10,587
RJM 1-6 Series	53	1	53	3	159	\$49.94	\$7,940
Unduplicated Totals	53	--	159	Varies	5,380	--	\$268,676

*Source: The hourly rate is computed by dividing the FY 2019 national average PS/PB annual salary for state staff as provided for through the distribution of state UI administrative grants (https://wdr.doleta.gov/directives/attach/UIPL/UIPL_10-18.pdf) by the average number of hours worked in a year (1,711). For FY 2019, this calculation is: \$85,453 / 1,711= \$49.94.

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 involved other than those mentioned in item 12.

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 staff costs are required to manage and maintain electronic files, training, report review and analysis. These costs total \$140,886-annually for RJM operations. This estimate assumed one GS 13-5 regional office staff dedicating 25 hours per state to generate and validate the 53 state submissions, allowing for 10 additional hours for staff to respond to final reconciliation issues raised by the national office, and one GS 13-5 national office staff working 1390 hours to manage electronic files, review and reconcile reports, and conduct analysis. This information is displayed on the following table.

Category	Ongoing	
National Office staff	1,390 hrs	\$73,443
Regional Office staff	1,855 hrs	\$67,443
TOTAL		\$140,886

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

The PS/PB IT worksheet required no user input. This information automatically populates from the PS/PB worksheet. This form is no longer included in the burden summary listed in #12 above.

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.*

ETA does not publish the results in a report but makes the data available on its web site. The RJM does not use complex analytical techniques.

State agencies begin to collect the data annually in mid-November and submit the data by the last Friday of January. ETA uses the data collected to inform ETA's administrative funding allocation model to provide state agencies resources for the next fiscal year.

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 displays the OMB control number and expiration date on the RJM worksheets in the instructional handbook for the state agencies. The date will appear in the specified format, XX/XX/XXXX.

18. *Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."*

There are no exceptions.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.