

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

A. Justification

The Department of Labor, Employment and Training Administration (ETA) is renewing an extension without changes for the Worker Profiling and Reemployment Services (WPRS) Activity and Worker Profiling and Reemployment Services Outcomes, information collection request (ICR).

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 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 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) and Reemployment Services and Eligibility Assessment (RESEA) Reports (OMB number 1205-0456) but these collections do not provide a description of the services and outcomes for the 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 that requires further explanation pursuant to regulations 5 CFR 1320.5.*

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 May 3, 2019 (84 FR 19119). One public comment was received that provided general support for the data collection. This commenter also recommended the collection of additional outcome data pertaining to changes in participants' occupation following reemployment. Currently, WPRS outcome data includes changes in participants' industry and at this time the Department will not expand this collection to include information about changes to occupation. The inclusion of occupation data would require manual collection (direct follow-up with each participant) and substantially increase states' total burden.

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.

Record Keeping: 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 20,027.5 submittals per state) x 6 min. transaction = 106,145.75 hrs. per year

3rd Party Disclosures: During FY 2019, States provided analysis and projected time burdens for several components of the RESEA including the projected time needed to provide reemployment services. Based on analysis of the recent RESEA data, the average estimated burden on claimants per WPRS referral is 2.5 hours. Therefore, the estimated burden on claimants to receive required reemployment service is:

1,061,457 claimants x 2.5 hrs. per claim x 1 annual response = 2,653,642.5 hrs.

Burden Summary Table

Activity	Number of Respondents	Annual Frequency	Total Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
ETA 9048	53	4	212	.25	53	\$49.94	\$2,6476.82
ETA 9049	53	4	212	.25	53	\$49.94	\$2,6476.82
Record Keeping	53	20,027.5	1,061,457	.1	106,1465.75	\$49.94	\$5,300,9198.75
3 rd Party Disclosure	1,061,457	1	1,061,457	2.5	2,653,6432.5	\$49.94	\$132,522,906.45
**Totals	1,061,510	--	2,123,338	--	2,759,894.25	\$49.94	\$137,829,1198.84

*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.

**Unduplicated totals

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 UI, 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.

Although no staff is required to process this report, ETA has budgeted \$965,920.33 to operate and maintain the Unemployment Insurance Required Reports system. Including the subject 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 system cost/30 information collections).

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. Burden and cost estimates have been updated to reflect FY 2019 data and projections.

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.