

**SUPPORTING STATEMENT FOR
DISASTER UNEMPLOYMENT ASSISTANCE ACTIVITIES REPORT**

OMB CONTROL NO. 1205-0051

This information collection request (ICR) seeks an extension without change to 1205-0051, Disaster Unemployment Assistance Activities Report (DUA).

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 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 ETA 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 basis 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 A.2 above.

FEMA/DHS has delegated authority to DOL 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 DOL 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:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances or record keeping requirements.

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 April 7, 2020(85 FR 19505). No public comments were received.

9. Explain any decision to provide any payments or gifts 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. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

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 \$50.62 per hour = \$ 10,630.20 (annualized cost).*

Total annual time burden: ETA 902 (210 hours) Total annual cost burden: ETA 902 (\$10,630.20).

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Regular	30	6	180	1	180	\$50.62	9,111.60
Final Report	30	1	30	1	30	\$50.62	\$1,518.60

Unduplicated	30	Varies	210	1	210	\$50.62	\$10,630.20
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*Source: The hourly rate is computed by dividing the FY 2020 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_16-19.pdf) by the average number of hours worked in a year (1,711). For FY 2020, this calculation is: \$86,609 / 1,711= \$50.62

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

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

14. Provide estimates of the annualized cost 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), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

Federal Burden for Data Collection: ETA 902.

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

Estimated Annual Salary Cost to Review Data: \$5,873.70.

Note: The estimated cost is based upon the annual salary for a Washington, DC based GS-13, Step 5 at \$55.94 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/2020/DCB.pdf>). $\$55.94 \times 105 \text{ hours} = \$5,873.70$.

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, ETA has budgeted \$1,024,744.87 in fiscal year 2020, 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 \$34,158.16 ($\$1,024,744.87 \text{ system cost} / 30 \text{ information collections}$).

Total Federal costs are estimated to be \$40,031.86 ($\$5,873.70 + \$34,158.16 = \$40,031.86$).

15. Explain the reasons for any program changes or adjustments.

There are no changes to the burden hours.

16. For collections of information whose results will be published, outline plans for tabulations, 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 certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.