

**SUPPORTING STATEMENT FOR
BLS ANNUAL REFILEING SURVEY**

OMB CONTROL NO. 1220-0032

This ICR seeks OMB clearance for a renewal of the BLS Annual Refiling Survey.

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.

The Quarterly Census of Employment and Wages (QCEW) program is a Federal/State cooperative effort that compiles monthly employment data, quarterly wages data, and business identification information from employers subject to state Unemployment Insurance (UI) laws. These data are collected from state Quarterly Contribution Reports (QCRs) submitted to State Workforce Agencies (SWAs). Similar data for Federal Government employees covered by the Unemployment Compensation for Federal Employees (UCFE) Program are also included in each state report. All 50 states, the District of Columbia, Puerto Rico, and the Virgin Islands submit micro-level employment and wages data, supplemented with the names, addresses, and business identification information of these employers to the Bureau of Labor Statistics (BLS). BLS then summarizes these data to produce totals for the Nation, states, Metropolitan Statistical Area (MSAs) and counties. These data are used to create the BLS sampling frame and constitute the longitudinal QCEW data.

The QCEW program is a comprehensive and accurate source of monthly employment and quarterly wages data, by industry, at the national, state, MSA, and county levels. Several states publish QCEW data at the city or town level. The QCEW Report, produced for each calendar quarter, provides a virtual census of nonagricultural employees and their wages, with approximately 52 percent of the workers in agriculture covered as well. As the most complete universe of monthly employment and quarterly wages information by industry and detailed geography, QCEW data are used in evaluating labor trends and major and detailed industry developments, conducting time-series analyses and industry comparisons, and conducting special studies such as analyses of wages by size of establishment and firm.

The QCEW program provides data necessary to both the Employment and Training Administration (ETA) and the states in administering the Employment Security Program. These data accurately reflect the extent of coverage of the state UI laws and are used to measure UI revenues and disbursements; national, state, and local area employment; and total and taxable wages trends. The information is also used in actuarial studies, experience rating determination, maximum benefit level determination, Federal assistance determination, and UI fund solvency. To ensure the continued accuracy of

these published economic statistics, the information supplied by the employers must be reviewed and updated periodically.

There are nearly 10 million establishments on the QCEW file. These establishments cover all civilian employers (except interstate railroads) and some agricultural, domestic, and charitable organization employers. BLS intends to continue its review of private sector employers' North American Industry Classification System (NAICS) codes and geographic codes on a three-year cycle. Government establishments are not reviewed routinely. Each year, approximately one-third of private sector establishments are reviewed and updated, if necessary. Customarily, the BLS-3023 forms, collectively known as Annual Refiling Survey (ARS) forms, have been used in conjunction with the UI tax reporting system in each state. As a result, changes in the industrial and geographical compositions of our economy are captured in a timely manner and reflected in the BLS statistical programs.

This survey is authorized by Federal law 29 U.S.C. 2 and Section 15 of the Wagner-Peyser Act (Attachment A). Although employer cooperation is not required by Federal law, thirty states have laws that make completion of the ARS mandatory. Establishments in the survey are selected across industries using the seventh and eight digits of the Federal Employer Identification Number (EIN) in order to maintain balanced panels. In year one, units in the range 00-33 are surveyed. In year two, units in the range 34-66 are surveyed. Finally, units in the range 67-99 are surveyed in year three. For establishments that have no EIN on record, selection will be based on a range of digits within the establishment's UI account number. Establishments classified in Public Administration (NAICS Sector 92) and the United States Postal Service (NAICS 491110) are not surveyed. In addition, single establishments classified as private households (NAICS 814110) are not surveyed. Finally, multi-unit establishments classified as Professional Employer Organizations (NAICS 561330) are not surveyed because establishment level industry information is requested quarterly through the Multiple Worksite Report.

The BLS had previously developed three distinct ARS forms for the purpose of verifying and collecting specific information concerning the employer's industrial activity, geographic location, business mailing address, and physical location address.

The **BLS 3023-NVS** form is for employers with a single worksite within a state. Essentially, this form is for employers to verify a NAICS industry description that represents their existing NAICS code assignment. If that description is correct, the employer is asked to confirm the accuracy of the NAICS code. If the description is incorrect, the employer is asked to describe the business activities and the approximate percentage of the revenue or production derived from each activity.

The **BLS 3023-NVM** form is for employers that have multiple worksites within a given state and applies the same verification methods as the BLS 3023-NVS. This was intended to reduce employer burden, in that the company would receive one form for all worksites along with a description of the business activities for each worksite.

The **BLS 3023-NCA** form is used to collect information from those establishments that are in NAICS Code 999999 (Unclassified Establishments). These are establishments for which no information is available regarding their industrial activities. Employers are asked to provide detailed descriptions of their economic activities. Consequently, states can gather information on new business establishments where no information had been available.

The ARS also asks employers to identify new locations in the state. If these employers meet QCEW program reporting criteria, then a Multiple Worksite Report (MWR) is provided to the employer requesting employment and wages for each worksite each quarter (The MWR is a separate OMB-approved survey under OMB Control Number 1220-0134). Thus, the ARS is also used to identify new potential MWR-eligible employers.

To take advantage of more efficient methods and procedures, BLS developed an approach using a one-page letter rather than the aforementioned 3023 forms for ARS solicitation. This letter explains the purpose of the ARS and provides respondents with a unique Web ID and password. Respondents are directed to utilize the BLS online web collection system to verify or to update their geographic and industry information. Examples of the various blank 3023 forms for all states are still available at the BLS public website.

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 QCEW data are used by a variety of BLS programs. They serve as the basic source of benchmark information for employment by industry and by size class for the Current Employment Statistics (CES) and the Occupational Employment Statistics (OES) programs. The preliminary (estimated) employment data from these programs could not be benchmarked for accuracy without the QCEW data. The QCEW Report containing employer name and address information serves as a sampling frame for BLS establishment-based surveys, such as the National Compensation Survey (NCS), the Employment Cost Index (ECI), the Injuries, Illness, and Fatalities (IIF) program, the Job Openings and Labor Turnover Survey (JOLTS), and the CES and OES programs. Since the QCEW provides a near universe of businesses, these programs can select a statistically representative sample of the full universe by geography, industry, and size. The employment and wages data from the QCEW program represent the best and most current source of detailed industrial and geographical data used by businesses as well as by public and private research organizations. QCEW data are published within 6 months of the end of the reference quarter. For additional information and background on the QCEW program, please see the excerpt from the BLS Handbook of Methods (Attachment B) which describes the program in more detail. (The BLS Handbook of Methods is also available online at <https://www.bls.gov/pub/hom/cew/home.htm>.)

The QCEW data have also been used to improve the accuracy of other Federal statistical products. Since 1991, BLS has supplied industrial classification codes for "Unclassified" units to the Census Bureau for updating their Business Register. At the direction of OMB, BLS began sharing industry codes, physical location addresses, and other information with the Census Bureau. This BLS/Census Industry Coding Project helps improve statistical applications, such as the Census Business Register (BR), all programs using the Census BR, and the Economic Census and County Business Patterns. By sharing codes and other information, the consistency of BLS and Census products is enhanced, Census costs are reduced, and respondent burden is decreased. In FY 2019, BLS provided Census with information on 4.59 million units where Census had only partial or no information.

The QCEW program provides data necessary to both the Employment and Training Administration and the SWAs in administering the UI program. The data accurately reflect the extent of coverage of the state UI laws and are used to measure UI revenues; National, state, and local area employment; and total and taxable wages trends. The information is used as input for actuarial studies, determination of experience ratings, maximum benefit levels, and areas needing Federal assistance. It also assists in determining the solvency of UI trust funds.

The Bureau of Economic Analysis of the U.S. Department of Commerce uses QCEW data as a base for developing the wages and salary component of personal income, part of the National Income and Product Accounts. Personal income is instrumental in determining Federal allocation of program grants to state and local governments. QCEW wages accounted for 47 percent of total personal income and 94.2 percent of the wages and salary component of personal income in 2018. QCEW data also are incorporated into estimates of gross domestic product. The Social Security Administration and state governments also use QCEW data in updating economic assumptions and forecasting trends in their taxable wages base.

BLS has also created a longitudinal database from these QCEW program micro-level data to measure gross job gains and gross job losses. This database, which contains current as well as historical data, uses the establishment-level data from the program to study the labor dynamics of our economy. Without the QCEW data, all openings and closings of worksites as well as expansions and contractions of multi-establishment employers would be unknown. The BLS began publishing these data at the National level in late 2003 on a quarterly basis as the Business Employment Dynamics (BED) data series. Since then, BED has expanded the data to include gross job gains and gross job losses by major industry sectors, age and survival, and firm size-classes as well as by state. The quarterly data include the number and percent of gross jobs gained by opening and expanding establishments, and the number and percent of gross jobs lost by closing and contracting establishments. The data also include the number and percent of establishments that are classified as openings, closings, expansions, and contractions.

The QCEW data are a major input to the Census Bureau's Longitudinal Employer Household Dynamics (LEHD) program. The LEHD uses the QCEW data matched with wage records and other information to provide new economic data. The QCEW data

provide the crucial linkage between the wage records and the industry and geography detail that supports this program. Further, the Employer Identification Numbers in the QCEW data allow some linkages across Federal data sets. In this way, improvements in the QCEW program support improvements in the LEHD program.

Finally, businesses and public and private research organizations find the QCEW program to be one of the best sources of detailed employment and wages statistics. Data users appreciate the detail provided by the QCEW program at the industrial and geographical (county and state) levels. If the ARS were not undertaken, the reliability of data for industrial and occupational employment, hours and earnings, producer prices, productivity, and industry wages data would be adversely affected. All of these are dependent upon accurate industrial coding in the design and maintenance of their samples. Inaccurate industrial coding can also adversely impact payments that businesses and employees receive from contracts that use industrial earnings data for estimating escalating labor costs. Please see the chart (Attachment C) that illustrates the myriad uses of the QCEW program data in more detail.

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.

BLS constantly pursues a growing number of automated reporting options to reduce employer burden and costs and to take advantage of more efficient methods and procedures.

1. Printed Solicitations

Since 2015, QCEW has shifted from printed solicitation of ARS forms to the printed solicitation of one-page letters, directing respondents to the ARS Web and NVM Web systems. This shift has resulted in 100% electronic collection of the ARS. BLS developed and expanded upon the idea of using the services of a private contractor to handle various administrative aspects of the survey. This initiative is called the Centralized Annual Refiling Survey (CARS). Under CARS, BLS effectively utilizes the commercial advantages related to printing, stuffing, and mailing large volumes of survey letters. The objective of CARS is to reduce costs and state staff time associated with the clerical and administrative portions of the ARS.

2. ARS Web

Currently, the QCEW program uses the ARS Web as the only response platform for single unit establishments of the ARS. Respondents receive a one-page letter

or an email prompt and they log into the secure BLS system to review the ARS questions and provide responses electronically. As mentioned above, it replaced the use of forms.

3. NVM Web

QCEW collects a different survey, the Multiple Worksite Report (MWR) via an online collection system called the MWR Web system. This system allows multi-unit employers to report their employment and wages quarterly via the web. This system was expanded in 2013 so that if an MWR Web respondent is also eligible for the ARS in that given year, they are prompted to complete the ARS upon completion of their MWR. This reduces the number of ARS solicitations required and reduces the respondent need to log into multiple systems. Multi-unit respondents who do not report their MWR electronically receive a one-page letter for the ARS, directing them to report their ARS via MWR Web. ARS collection for multis using MWR Web has replaced the use of paper forms for multi-unit employers.

4. Email Blasts

In addition to printed solicitations, QCEW sends email solicitations to respondents who have reported via ARS and NVM Web in the past and provided email address and QCEW makes use of email addresses from participating states who provide email collected via UI Tax systems. Email prompts have proven to be a low-cost method of solicitation that results in more rapid data collection, as there is not a printing/mailing lag time.

5. Central Review

In FY 2003, BLS staff began reviewing selected, large multi-worksite national employers rather than surveying them with traditional ARS forms. For the FY 2006 ARS, the central review process was expanded to include employers providing Multiple Worksite Report data to the BLS Electronic Data Interchange (EDI) Center in Chicago. BLS staff conducts the ARS review simultaneously for the EDI Center's large employers. This reduces their burden as well as creates an additional incentive for electronic reporting. Central review reduces postage costs related to sending ARS forms. It also reduces respondent burden, as the selected employers do not have to submit ARS forms. The industry coding and worksite information is reviewed by BLS staff and potential inconsistencies are forwarded to the states for review and correction, if necessary. Finally, central review improves NAICS coding consistency across states for national companies engaged in similar activities.

6. Platform for Quick Business Survey

In FY 2018, QCEW began testing the use of the ARS response system as a platform for asking additional questions that may aid in the research of labor market questions. Upon completion of the ARS questions, respondents would be presented with the option to continue on to participate in another survey. This would allow a low-cost, low-burden option for quickly fielding topical establishment surveys.

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.

The Office of Employment and Unemployment Statistics coordinates the ARS activity within the BLS and states and verifies that unnecessary duplication is avoided. In addition, no similar information of this type is available to the BLS or the states.

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

The product and activity information necessary to determine an employer's industry code is readily available in both small and large establishments. The ARS was specifically developed for simplicity of understanding and ease of completion.

Unlike some larger businesses, small businesses are less likely to have more than one worksite. Establishments with fewer than 3 employees were excluded from ARS beginning in FY 2015. Finally, employers in certain NAICS industries that traditionally had low volatility were put on a six-year cycle that same fiscal year.

However, commencing with the FY 2018 ARS, BLS began to include establishments with 3 or fewer employees and 6-year cycle NAICS industries using only email. No letters would be used. The cost-effective email approach lets BLS obtain information from these previously-excluded establishments.

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 QCEW data are reviewed and updated to assure the continued accuracy of the published economic statistics that are produced by the BLS. Until FY 2014, the three-year cycle enabled the information supplied by each business to be reviewed once every three years. A less-frequent review cycle would eventually jeopardize the quality of the

data and diminish the capacity of the BLS to produce meaningful statistical estimates. However, certain NAICS industries traditionally have low volatility based on factors such as infrastructure, intellectual property, or advanced degrees that make them unlikely candidates for transitioning to another industry. The QCEW program surveys one-sixth of these businesses on a six-year cycle. The six-year cycle preserves the ability to identify trends in these industries, while maintaining essential budget flexibility.

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 confidentially to the extent permitted by law.**

There are no special circumstances that would cause this information to be collected in other than the manner specified in 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.

Two comments were received in support of the ARS as a result of the Federal Register notice published in 85 FR 52158 on August 24, 2020.

The BLS is in constant contact with the SWAs on the administration of the QCEW program, such as:

1. Daily contact between BLS Regional Office and SWA officials.
2. Field visits by BLS Washington and Regional Office staff members to SWA offices.
3. A QCEW Policy Council established by BLS in 2000. The Council is composed of state and BLS staff members that provide ongoing technical expertise and research as well as assist in the prioritization of program enhancements.
4. Periodic meetings with members of the National Association of State Workforce Agencies (NASWA).
5. Consultation with members of the Federal Data Users Advisory Committee (DUAC).

BLS works closely with a number of Federal agencies which use BLS data, including the Regional Income Division, Bureau of Economic Analysis, U.S. Department of Commerce, contact: Mr. Marcelo Yoon, Chief of the Compensation Branch; and the Office of Unemployment Insurance, Employment and Training Administration, U.S. Department of Labor, contact: Ms. Gay Gilbert, Administrator.

Furthermore, BLS has been participating in meetings of the Wiesbaden Group on Business Registers. This international expert group promotes the exchange of new techniques used by the participating countries in their development of universe files and collection of employer data using new alternative strategies. BLS staff also present papers and participate in the International Conference on Establishment Statistics and American Statistical Association conferences where emerging technologies for collecting data from employers and lowering respondent burden are discussed in great detail.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

None.

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

The Confidential Information Protection and Statistical Efficiency Act (CIPSEA) safeguards the confidentiality of individually-identifiable information acquired under a pledge of confidentiality for exclusively statistical purposes by controlling access to, and uses made of, such information. CIPSEA includes fines and penalties for any knowing and willful disclosure of individually identifiable information by an officer, employee, or agent of the BLS.

BLS policy on the confidential nature of respondent identifiable information (RII) states that “RII acquired or maintained by the BLS for exclusively statistical purposes and under a pledge of confidentiality shall be treated in a manner that ensures the information will be used only for statistical purposes and will be accessible only to authorized individuals with a need-to-know.”

This policy remains in effect; however, the extent of confidentiality maintained within each state varies in accordance with the laws of each state. For this reason, the statement on the ARS collection instruments make no promise of confidentiality. However, once the QCEW data are furnished by the states to the Bureau, and in the Bureau's possession, the data are considered confidential and are covered by CIPSEA. The BLS considers the maintenance of the confidentiality of data collected under a pledge of confidentiality to be critical to ARS program integrity.

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 sensitive questions are asked.

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. General, 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.**

BLS 3023 - Annual Refiling Survey:

- a. Number of respondents: 1,098,000
- b. Frequency of response: Annually
- c. Annual burden: 116,750
- d. Estimation of burden: Based on 2020/1

ARS Collection Instrument	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)
BLS NVS Non-mandatory	397,000	1	397,000	0.083	33,083
BLS NVS Mandatory	444,000	1	444,000	0.083	37,000
BLS NVM Non-mandatory	22,000	1	22,000	0.25	5,500
BLS NVM Mandatory	24,000	1	24,000	0.25	6,000
BLS NCA Non-mandatory	91,000	1	91,000	0.167	15,167
BLS NCA Mandatory	120,000	1	120,000	0.167	20,000
Totals:	1,098,000		1,098,000		116,750

The estimated cost to the respondents is \$2,394,543. This amount was derived by multiplying the total annual burden hours to complete the form by the wage for a worker in a representative occupation that completes the survey. The wages for Office and

Administrative Support occupations was obtained from the BLS National Compensation Survey (NCS), Employer Costs for Employee Compensation program. This rate was \$ 20.51/hour based on 2019 NCS data.

Calculation: $\$20.51 \times 116,750 \text{ hours} = \$2,394,543$

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).

There are no capital or start-up costs associated with the ARS.

There are no costs to SWAs for collecting information on the ARS above the money funded by the BLS as part of the overall QCEW program.

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.

Listed below are the estimated FY 2020 federal government costs for the QCEW program. Costs associated with other QCEW-related forms previously approved by OMB are included.

Personnel	\$15,000,000
Other	\$11,000,000
SWA funding	<u>\$33,000,000</u>
TOTAL	<u>\$59,000,000</u>

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

The increase in total hours requested, from 115,089 to 116,750, is due to the growing size of the establishment universe from 10.1 to 10.6 million.

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.

BLS will not publish or release the confidential employment and wages micro-data. The BLS reports from the QCEW program as well as the BLS website (www.bls.gov) make use of information from the ARS:

- (A) Quarterly news releases on county and National employment and wages with industry detail are usually issued 6 months after the reference quarter.
- (B) Quarterly news releases on Business Employment Dynamics at the National and state level are published approximately 7 months after the reference quarter. Currently, the quarterly news release covers National private sector data job creation and destruction by industry and establishment and firm size class, state total private data, and data on business births and deaths.
- (C) An annual comprehensive bulletin is published about 9 months after the reference year. This web-only publication, Employment and Wages Online, is the successor to the annual print bulletin, Employment and Wages. In March 2010, the 2008 edition of the Employment and Wages bulletin was the final issued on paper.
- (D) Quarterly employment and wages data with industry detail at the National, state, MSA, and county levels are released on the BLS website 6 months after the reference quarter.
- (E) Annual employment and wages data with industry detail at the National, state, MSA, and county levels are released on the BLS website 6 months after the reference year.
- (F) SWAs issue quarterly and/or annual reports on QCEW data in an aggregate form.

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.

No exemption is requested.

18. Explain each exception to the certification statement.

There are no exceptions to the "Certification for Paperwork Reduction Act."

Although thirty states have laws that mandate completion of the ARS, employer cooperation is not required by Federal law. However, all of the ARS web letters and email messages request a response within 14 days of receipt. This is not a requirement to respond within 14 days. Mentioning 14 days is more likely to result in a prompt response. Thus, it is intended as a recommendation rather than as a threat of any penalty for not replying within that time period.