

**SUPPORTING STATEMENT FOR
UI NON-FILER SUPPLEMENT TO THE CURRENT POPULATION SURVEY**

OMB CONTROL NO. 1220-0193

This information collection request (ICR) seeks to reinstate with change the Unemployment Insurance (UI) Non-filer Supplement to the Current Population Survey (CPS).

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 purpose of this request for review is for the Bureau of Labor Statistics (BLS) to obtain clearance for the UI Non-Filer Supplement to the CPS, scheduled to be conducted in February 2022 and May 2022. The supplement will be administered to half of the sample in February 2022 (rotation groups 2, 3, 6, and 7) and to the full sample in May 2022 (rotation groups 1 through 8). This supplement was last given in May and September of 2018. The proposed supplement questions are shown in Attachment A. The UI Non-Filer Supplement will be asked about all household members age 16 or older who are unemployed and about a subset of those who are not in the labor force. The supplement will be sponsored by the Department of Labor's Chief Evaluation Office (CEO).

UI benefits are intended to provide temporary financial assistance to people who are unemployed through no fault of their own and meet certain eligibility requirements. These UI payments can have other benefits as well, such as helping to stabilize the economy during recessionary periods. Little, however, is known about the reasons and characteristics of people who do not file for UI benefits. Results from this supplement will be used to determine the number and characteristics of those who do and do not file for UI benefits, as well as non-filers' reasons for not filing. The data are necessary for the Department of Labor and other policymakers to measure the effectiveness of current UI programs and to plan for future changes, especially in the wake of the coronavirus (COVID-19) pandemic.

The CPS has been the principal source of the official Government statistics on employment and unemployment for over 75 years. Collection of labor force data through the CPS helps BLS meet its mandate as set forth in Title 29, United States Code, Sections 1 through 9 (Attachment D).

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 UI Non-Filer Supplement will gather information on people who are unemployed but also on a subset of those not in the labor force. Information will be collected about UI participation and reasons for not participating. The supplement also contains questions about people's job search experience, such as information about jobs for which they have applied and whether they would accept a job similar to their last job at lower pay. UI benefits provide temporary financial assistance to the unemployed who meet certain eligibility criteria and can also help protect the economy during economic downturns. Unemployment increased dramatically in the wake of the pandemic, making updated information of paramount importance. Data gathered in this supplement will help measure the effectiveness of existing UI programs and assist policy makers in developing future policies. Additionally, there is a notable dearth of available data describing the job search process of unemployed individuals and the difficulties these seekers have in finding new employment. This supplement will offer data on the hurdles the unemployed face while searching for work.

Because this supplement is part of the CPS, in which detailed demographic data are collected, estimates can be produced for a variety of subpopulations. Given sufficient sample size, comparisons between UI filers and non-filers will be possible across characteristics such as sex, race and ethnicity, age, and educational attainment.

BLS published a summary of the findings of the May and September 2018 UI Non-filer Supplement in a news release issued in September 2019 (Attachment B). Additionally, a November article posted on the BLS website presented data on how jobseekers search for jobs from the supplement (Attachment C).

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 Census Bureau, which conducts the actual collection of the CPS data—designing the sample, training and monitoring the interviewers, and conducting a continuing quality control program—uses methods designed to keep respondent burden as low as possible. These interviewing methods, which include the use of computer-assisted interviewing, were improved as part of a complete redesign of the CPS implemented in January 1994. The redesign was preceded by years of wide-ranging discussions, research, and large-scale field tests aimed at long-range improvements in the survey.

The CPS and all of its supplements are collected 100 percent electronically by using Computer Assisted Telephone Interviews and Computer Assisted Personal Interviews (CATI/CAPI). With the collection of Basic CPS data for January 2007, an updated computer-assisted interviewing software, called Blaise, was introduced for running the data collection instrument. Blaise is a Windows-based survey processing system developed by Statistics Netherlands and licensed by Westat in the United States. The questions in the UI Non-Filer Supplement were designed to obtain the required information with minimal respondent burden.

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.

There are few data sources about the characteristics of unemployed people who do not file for UI benefits and their reasons for not doing so. Some other CPS supplements contain basic information about people who receive UI benefits. The Annual Social and Economic Survey contains information about income received through UI benefits; this information, however, is limited to income received through UI programs in the past year and does not include any information on people who did not file or who filed but did not receive benefits. Another CPS supplement, the biennial Displaced Worker Supplement, collects information about UI participation and whether benefits were exhausted; these data are collected only for those age 20 or older who have been displaced from a job in the past three years.

The Census Bureau's Household Pulse Survey contained questions about whether respondents applied for UI benefits and whether they received them. However, the survey did not collect information on the reasons that people did not file or detailed questions on their job search activities.

Some smaller scale studies of UI participants have been conducted using administrative data or samples from UI Claims data. For example, a Department of Labor (DOL)-sponsored, two-wave longitudinal study in two areas of California examined the experience of UI recipients, and 2008-2009 claims data were used to examine the experiences of UI participants who did and did not exhaust their benefits. Since these studies relied on administrative data from UI Claims, UI non-filers were not included.

Lastly, there is a lack of available data about the difficulties unemployed individuals have in seeking new employment. The questions about applications and job offers, which were introduced in the 2018 supplement, will help fill that lack of data.

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

The data are collected from households; their collection does not involve any 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.

Because the UI Non-Filer Supplement has not been conducted since 2018, there is a dearth of high quality, post-pandemic data about people who do not file for UI benefits and their reasons

for not doing so. More information is needed to assess the efficacy of UI programs in the wake of the pandemic. This information—in combination with information collected in the monthly CPS, such as demographic characteristics and information about last job held—will help guide law makers to determine if new policies or regulations are needed to protect these and other types of workers.

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. The CPS data are collected in a manner that is consistent with the guidelines 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.

- a. One public comment was received as a result of the Federal Register notice published in 86 FR 23431 on May 3, 2021.

The comment, which was e-mailed to BLS on May 3, 2021, was out of scope. The mission of the BLS is to measure labor market activity, working conditions, price changes, and productivity in the U.S. economy to support public and private decision making. This particular information collection aims to assist the Department of Labor and other policymakers to plan, fund, and evaluate UI programs.

- b. The following people have been in continuous consultation concerning the development of the survey:

U.S. Department of Labor
Christina Yancey
Chief Evaluation Officer
Office of the Assistant Secretary for Policy
Department of Labor
(202) 693-5910

Bureau of the Census
Kyra Linse
Associate Director Demographic Programs
Bureau of the Census
Department of Commerce
(301) 763-9280

In addition to the above, a statement soliciting comments for improving CPS data is prominently placed in all Census Bureau publications that cite CPS data. A similar statement is included in the technical documentation that accompanies the microdata files. Finally, the advance letter (Attachment F) provides respondents with an address at the Census Bureau to which they can submit general comments on the survey, specifically those regarding respondent burden.

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

The Census Bureau does not make any payments or provide any gifts to individuals participating in the CPS.

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

The Census Bureau will collect the supplement data in compliance with the Privacy Act of 1974 and OMB Circular A-130. Each sample household will receive an advance letter (Attachment F) approximately one week before the start of the initial CPS interview and a follow-up letter approximately one week before the start of the fifth CPS interview (Attachment G). The letters include the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and state the estimated time required for participating in the survey. Field representatives must ask each respondent if he/she received the advance letter and, if not, must provide a copy of the letter to each respondent and allow sufficient time for him/her to read the contents during in-person interviews. Also, interviewers provide households with the pamphlet "How the Census Bureau Keeps Your Information Confidential," which further describes the Census Bureau's commitment to data confidentiality (Attachment I). If they feel it will be helpful, interviewers also provide households with the "Factsheet for the Current Population Survey," which contains information about and data from the CPS (Attachment E). All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9 (Attachment H). Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or substantial fine if he/she discloses any information given to him/her.

As is the case with data collection, data released to the public by BLS in tabular form or as microdata files are released in compliance with Title 13. Tabular data released to the public are always in aggregated form. No individual survey records are made available to the public. Any microdata files that are released are public use files with all identifying information removed from the records.

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 in this supplement.

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.**

The estimated respondent burden for the February and May 2022 UI Non-Filer Supplements is 2,250 hours. This is based on an average burden of approximately 3 minutes for each of the 45,000 people asked about in the supplement (15,000 for February and 30,000 for May). Generally, one respondent answers for the household. The actual respondent burden is dependent upon the size of the household and the characteristics of its occupants. The overall annualized dollar cost to the respondents for collection of the supplement data is \$36,810. This estimate assumes a wage rate for all respondents of \$16.36 an hour, the median hourly earnings for workers paid by the hour in 2020.

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
CPS UI Non-filer Supplement	45,000	1	45,000	3/60	2,250	\$16.36	\$36,810

13. Provide an estimate of 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 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.**
- a. Capital start-up costs: \$0
 - b. Total operation and maintenance and purchase of services: \$0

There are no costs to survey respondents other than the time it takes to respond to the questionnaire. Respondents answer questions based on personal experience, which requires no record-keeping or other expenses.

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.

The total estimated cost of the February and May 2022 supplements is approximately \$800,000. This cost is borne by the DOL's Chief Evaluation Office (CEO) and largely represents the charge by the Census Bureau for conducting the supplement. Census activities for this supplement include programming the collection instrument, updating interviewer training materials, collecting and processing data, and creating a public use microdata file. Also included are costs for BLS staff to evaluate data quality, analyze results, prepare a news release, and publish estimates.

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

Based on the previous supplement, the total number of estimated respondents has decreased because the 2022 supplement will be administered to a smaller sample. The 2018 supplement was administered to the full sample in May and September (rotation groups 1 through 8). The 2022 supplement will be administered to half the sample in February 2022 (rotation groups 2, 3, 6, and 7) and the full sample in May 2022 (rotation groups 1 through 8).

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.

The February 2022 CPS, of which this supplement is a part, will be conducted largely during the week of February 13-19, 2022. The May 2022 CPS will be conducted largely during the week of May 15-21, 2022. Processing of these supplements will commence in March 2022 and June 2022, respectively. Survey results will appear as a news release in 2023.

The news release will be published in electronic format and will be posted on the BLS webpage at www.bls.gov/cps. Additionally, the Census Bureau will release a public use version of the microdata after the publication of the news release.

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 Census Bureau does not wish to display the assigned expiration date of the information collection because the instrument is automated and the respondent, therefore, would never see the date. The advance letters sent to households by the Census Bureau contains Census's OMB clearance number for the CPS and Census's version of the failure to comply notice. (See attachments F and G.) Copies of these advance letters are stockpiled by the Census Bureau for use as needed; changes to the letter would make the current inventory of letters unusable.

18. Explain each exception to the certification statement.

There are no exceptions to the certification.