

**SUPPORTING STATEMENT FOR
WORK APPLICATION/JOB ORDER RECORDKEEPING
OMB CONTROL NO. 1205-0001**

A. JUSTIFICATION

This Information Collection Request (ICR) is being submitted by the Department of Labor (DOL) as an extension without changes in order to extend the expiration date beyond its current expiration, October 31, 2022.

- 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.**

Work applications (commonly referred to as “registrations”) are used in American Job Centers (AJC), also known as One-Stop Centers, for individuals seeking assistance in finding employment or employability development services. They are used to collect information such as: applicants’ identification, qualifications, work experience, and desired pay. They also include services provided to applicants, such as job development and/or referral to supportive services.

Job orders are used in AJCs to obtain information on employer job vacancies. Information in the job orders include employer identification, job requirements, and/or pay information, as well as identification of persons referred, hired, or refused. The information is collected at the employer’s request in order to publicize job vacancies. The information is collected by AJCs and posted on electronic job banks.

The exact information to be collected on work applications and job orders (and the manner in which it is maintained) is determined by the State. At a minimum, the information to be collected is that which enables the State to comply with regulations under 20 CFR 652 and the Wagner-Peyser Act, as amended.

20 CFR 652.8 states in pertinent part as follows:

“Each State shall retain basic documents for the minimum period specified below:
(i) Work Application: three years
(ii) Job orders: three years”

In addition to the requirement in 20 CFR 652.8, [2 CFR 200.334](#) further states the following regarding records retention:

“Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained *for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to*

the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities...

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.

Retention of data for three years is necessary 1) to align with other Wagner-Peyser Act requirements, 2) in event of issues that may arise when information must be verified. The DOL can thus report on data that can be verified to a source record and 3) should a complaint arise, this information will show the services provided to the applicant and the terms and conditions of the job listed in the job order. Extension of the currently approved ICR will allow states to continue collecting the necessary information, which enables DOL monitoring activities on these records, beyond the current expiration of September 30, 2022.

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 bias for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

State Workforce Agencies, through AJCs collect this information electronically.

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.

No duplication exists.

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

This data 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.

The only requirement is for retention of work application and job order information for three years. The burden is minimal, and if the information is not maintained, DOL would be unable to conduct required monitoring activities and data validation.

7. Explain any special circumstances that would cause an information collection to be conducted.

There are no special circumstances that would cause an information collection to be conducted.

8. If applicable, provide a copy and identify the data 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.

The DOL published a 60-day Federal Register Notice on April 6, 2022 (87 FR 19976) soliciting public comments on the information collection request regarding its extension without changes of the data retention required by 20 CFR 652.8 of the Wagner-Peyser Act. The Department received no public comments during the comment period.

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

There is no payment or gift to respondents.

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

No assurance of confidentiality is involved with the retention of 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.

No sensitive questions are included in this request.

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

The burden of maintaining work application and job orders data in the automated environment, which exists in all States, is minimal since maintaining records, updating files, purging records, and preparing reports are a necessary part of normal State labor exchange operations. The annual burden estimated for retention of information is estimated at 8 hours per state, (52x8) or 416 hours total.

The burden hours are based on a workload of 25,000 bundled files of openings and applications electronically archived at approximately 1 minute per bundle. This is a total of 416 hours. When divided by the total number of respondents (52), the workload is roughly 8 hours per respondent.

$\$55.31$ (hourly staff time) x 416 annual hours' burden = $\$23,008$

Estimated Annualized Respondent Hour and Cost Burdens

No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg, Burden per Response (in Hours)	Total Burden Hours	Hourly Wage Rate*	Total Cost Burden
52	1	52	8	416	\$55.31	\$23,009

Data is from the BLS electronic tool for the "Employer Costs for Employee Compensation," BLS Survey, available at <http://www.bls.gov/ncs/ect/#data>

Data is for Professional and Related Occupations in service providing industries (Table 3) found at <https://www.bls.gov/web/ecec/ecsuptc.pdf>.

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).

There are no additional costs to the respondent other than the cost of their time identified in section 12.

14. Provide estimates of 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), and any other expense that would not have been incurred without this collection of information.

There are no federal costs associated with this data collection.

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

There are no program changes or adjustments association with this ICR extension request.

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.

There are no plans to publish data.

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.

There are no forms associated with this request.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions,”

There are no exceptions.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.