

**SUPPORTING STATEMENT FOR
Short-Time Compensation Grant
OMB CONTROL NO. 1205-0499**

This ICR seeks an extension without change to OMB 1205-0499, for Short-Time Compensation Grants.

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 enactment of the Middle Class Tax Relief and Job Creation Act (MCTRJC) contains Subtitle D, Short-Time Compensation (STC) Program, also known as the “Layoff Prevention Act of 2012.” The MCTRJC offers grants to implement or enhance an STC program and/or to promote and enroll employers in the program. ETA cannot monitor the STC grants without obtaining from state workforce agencies (SWA) the quarterly progress reports (QPR), which notes the SWA’s status of completing the STC grant activities. In addition to the MCTRJC, the enactment of Public Law 116-136 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020, referred to hereafter as “the CARES Act” contains section 2110, Short-Time Compensation Program. Section 2110 of the CARES Act covers grants the Federal Government provided to states for the purpose of implementation or improved administration of an STC program or for promotional and enrollment in the program. The CARES Act also requires a QPR per approved grant, which increases the number of responses.

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 information collected from monitoring the QPR is used to track STC grant activities and ensure that the SWAs achieve the goals set forth in the approved STC grant applications.

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 reporting elements required in the QPR involve narratives and, as such, are not supported by automation. However, the QPRs SWAs submit electronically through email.

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.

This data is not available from other sources in any manner.

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

There are no special circumstances for this information collection. The collection is conducted in a manner consistent with guidelines published in UIPL No. 27-12 and UIPL 22-20.

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.

If these data were collected less frequently, ETA's ability to carry out its grant oversight responsibility would be compromised.

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 for this information collection. The collection is conducted in a manner consistent with guidelines published in UIPL No. 27-12 and UIPL 22-20.

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.

ETA consulted with three internal and external representatives to the agency involved in requesting quarterly STC activity on the STC Quarterly Progress Reports (QPR). The consultation asked Washington State Employment Security Division, Oregon Employment Department, and New York State Department of Labor contacts for their feedback on burden estimates for information collection activities associated with requesting quarterly STC grants activity on the STC QPRs. Two of the three representatives had no changes or comments on the estimated burden, while New York's representative offered a minor adjustment of 2 hours. ETA is proceeding with the initial estimates published in the 60-day notice. The individuals/organizations consulted about the information collection are listed in the table below.

Contact	Organization	Email	Phone
Cheryl Brown	Washington State Employment Security Division	cheryl.brown@esd.wa.gov	360-890-3370
Brandi Baker	Oregon Employment Department	Brandi.D.BAKER@employ.oregon.gov	971-707-3016
Regenna	New York	Regenna.Darraah@labor.ny.gov	518-457-

Contact	Organization	Email	Phone
Darrah	Department of Labor		1143

As required by 5 CFR 1320.8(d), ETA solicited comments on the proposed extension of approval for STC through a sixty-day notice published in the Federal Register on August 16, 2024 (89 FR 66740). 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 payments or gifts have been provided to respondents.

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

The QPRs contain no personal or confidential 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.

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.**

Total Annualized Estimated Respondent Burden Hour and Costs

There are 19 total STC grants under the MCTRJC and the CARES Act that still have funds remaining and require quarterly QPRs. These grants are spread out over 19 states. Sixteen (16) states have funds remaining on two (2) grants and three (3) states have funds remaining on one (1) grant each. Sixty-eight (140) QPRs are submitted each year from these 19 states (128 for the MCTRJC Act and the CARES Act Short-Time Compensation Implementation Grant and 12 for the MCTRJC Act and the CARES Act Short-Time Compensation Promotion Grant). The time to complete each QPR is estimated at one hour, for a total of 140 hours per year, at an hourly rate of \$53. The total monetized annual value of respondent time is estimated at \$7,420.

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
States With STC Grants to Implement or Enhance an STC Program	16	8	128	1	128	\$53	\$6,784
States With STC Grants to Promote and enroll employer in the program	3	4	12	1	12	\$53	\$636
Unduplicated Average Annual Cost Total	19	12	140	1	140	\$53	\$7,420

*Source: The hourly rate is computed by dividing the FY 2025 national average PS/PB annual salary for state staff as provided for through the distribution of state UI administrative grants (<https://www.dol.gov/agencies/eta/advisories/uipl-19-24>) by the average number of hours worked in a year (1,711). For FY 2025, this calculation is: $\$90,282 / 1,711 = \53 .

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 startup 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 costs to the respondents other than the cost of their time.

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.

There are no annualized costs to the Federal Government.

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

There are no changes or adjustments to the program.

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 collected from this project at this time.

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 Department intends to display approval information.

18. Explain each exception to the certification statement.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

Statistical methods are not used in this collection report.