

**SUPPORTING STATEMENT FOR
BUREAU OF LABOR STATISTICS
WAGE RECORDS DATA SHARING**

OMB CONTROL NO. 1220-*NEW

This ICR seeks OMB approval to implement a new data collection for Wage Records Data Sharing. The collection will allow states participating in the Bureau of Labor Statistics (BLS) Unemployment Insurance (UI) Wage Records Data Sharing Program to request data from other participating states for statistical research.

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.

This collection will allow the BLS to facilitate the sharing of confidential data to states participating in the BLS UI Wage Records Data Sharing Program for statistical research. An important aspect of the mission of the BLS is to disseminate to the public the maximum amount of information possible. Not all data are publicly available because of the importance of maintaining the confidentiality of BLS data. However, participating states may receive confidential data for purposes of conducting valid statistical analyses that further the mission of the BLS as permitted in the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) and under 29 U.S.C. 1 & 2.

The sharing of the UI data among BLS and the State Partners is authorized under 20 CFR §603.9, which permits re-disclosures of the UI data by Federal and State agencies to a “public official,” as defined in 20 CFR §603.2(d), for the purpose of either administering a law or executing their official duties. In addition, research involving out-of-state wage records for the purpose of economic and statistical research furthers state administration of Workforce Innovation and Opportunity Act (WIOA), 29 U.S.C. Chapter 32, reporting requirements.

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 BLS Quarterly Census of Employment and Wages (QCEW) Program produces a comprehensive tabulation of employment and wage information for workers covered by state unemployment insurance laws and is a virtual census of payroll employment. The BLS produces publicly available files from the QCEW data that include information on the number of

establishments, monthly employment, and quarterly wages, by industry, at the 6-digit North American Industry Classification System (NAICS) level, by county by ownership sector, for the entire United States. QCEW data have broad significance in evaluating labor trends and major industry developments. They are used in time series analyses, industry comparisons, and in special studies such as analyses of wages by size of establishment. The program also produces data necessary to both the Employment and Training Administration (ETA) and various State employment security agencies in administering the employment security program.

The QCEW Program contains no individual wage records data; however, the BLS has started a program to exchange data about the employment and wages of individuals that was not previously provided from employers or state UI programs under the QCEW. The program promotes the interchange of information, from participating states who have entered into MOUs with the BLS. The additional wage records data will be compiled into a multi-state longitudinal database and the data will be used to improve existing BLS data products and to explore the creation of new ones. The longitudinal database will allow for research on outcomes of specified cohorts. This type of research answers questions of, for example outcomes for people who receive job training assistance. In addition, compiling a longitudinally linked multi-state database will also provide state partners with limited out-of-state wage records for the purpose of economic and statistical research and further State administration of Workforce Innovation and Opportunity Act (WIOA), 29 U.S.C. Chapter 32, reporting requirements.

To provide wage records information to participating states, the BLS must collect certain information from the states. This information collection allows the BLS to obtain the details necessary for providing accurate data to participating states.

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.

Participating states may complete the Confidential Wage Records Data Request Form online/have the option of submitting fillable PDF forms by 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.

There is no duplication of information within the collection of information. Participating states are required to provide only the information necessary to request data from the BLS that have been provided by other participating states.

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

The information is collected from participating states; no small businesses or other small entities are involved.

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.

Information collected in the Confidential Wage Records Data Request Form is necessary to accurately determine the information requested by participating states. As the information being requested and provided under the Wage Records Data Sharing Program is sensitive, it's important to determine what information is needed and the intended use(s) of the information so that BLS provides only the information that is needed.

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 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. [No comments/# of comments] were received as a result of the Federal Register notice published on May 5, 2025 (90 FR 19006).
- b. Consultations outside the Agency:

Participating States

The form was provided to BLS' state partners on the Wage Records Advisory Committee. Changes were made according to their suggestions for clarity and ease of use.

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

No payments or gifts are provided to the participating states.

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 provided to participating states as no issues of confidentiality are involved with the retention of data from the Confidential Wage Records Data Request Form.

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 sensitive questions.

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.**

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Expected Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Wage Records Data Requests	20	1	20	10/60	3.33	\$18.12	\$60.34

*Costs are rounded to the nearest dollar and calculated using 2022 median hourly earnings (\$18.12) from the Current Population Survey (see Attachment D.)

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.

a. Capital start-up costs: \$0

b. Total operation and maintenance and purchase of services: \$0

There are no costs to the participating states other than the time it takes to complete the Confidential Wage Records Data Request Form. There are 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.

Listed below are the estimated FY 2025 federal government costs for the QCEW program. Costs associated with other QCEW-related forms previously approved by OMB are included. Data produced by the QCEW program, including Wage Records data, are collected and released in partnership with the State Workforce Agencies (SWAs).

Personnel (compensation and benefits for BLS federal staff who work in the QCEW program)	\$17,000,000
Other (contracts, centralized support and licenses, equipment, etc.)	\$11,000,000
SWA funding	<u>\$32,000,000</u>
TOTAL	<u>\$60,000,000</u>

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

Total respondent burden for this new collection will be 3.33 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.

The information collected will not be for public use, but rather to allow the exchange of wage records data between participating states.

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.

BLS is requesting OMB approval for permission to suppress the expiration date on the form. A printed expiration date would restrict BLS' ability to use the same form in subsequent years.

18. Explain each exception to the certification statement.

There are no exceptions to the certification.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

BLS Wage Records Data Application
OMB Control Number: 1220-*NEW
OMB Expiration Date: N/A

This information collection does not employ statistical methods.