SUPPORTING STATEMENT FOR REQUIRED ELEMENTS OF AN UNEMPLOYMENT INSURANCE (UI) REEMPLOYMENT SERVICES AND ELIGIBILITY ASSESSMENT (RESEA) GRANT STATE PLAN

OMBCONTROL NO. 1205-0538

The Department of Labor (Department), Employment and Training Administration (ETA) is submitting a revision Information Collection Request (ICR) to implement and collect an annual RESEA state plan as described in Section 306(e) of the Social Security Act (SSA). The revised data collection includes several revisions intended to reflect recent changes to the RESEA program, to remove elements that are no longer routinely used to support grant management, and to provide states with the opportunity to include additional narrative descriptions that more fully reflect the state's planned RESEA activities and the economic or other factors that the state considered during the planning process. Beginning in FY 2023, section 303(c)(2), SSA, required states to devote a specific percentage of their RESEA funding to evidence-based components and a new table was included in the revised form to capture this statutorily required information.

The burden estimate for this data collection is 40 hours, which is unchanged from the 2022 ICR. The burden is unchanged due to the removal of redundant elements, improvements to the state plan template, and other activities intended to support more efficient state planning activities. Additional information about the state plan revisions and burden estimate is provided below.

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 federal-state UI program is a required partner in the comprehensive, integrated workforce system. Individuals who have lost employment due to lack of suitable work and have earned sufficient wage credits may receive UI benefits if they meet initial and continuing eligibility requirements. Since 2005, the Department and participating state UI agencies have been addressing individual reemployment needs of UI claimants and working to prevent and detect UI improper payments through the voluntary UI Reemployment and Eligibility Assessment (REA) program and, beginning in FY 2015, through the voluntary RESEA program. Because there is strong evidence that these programs and service delivery strategies work, they have been a high priority for the ETA.

On February 9, 2018, the Bipartisan Budget Act of 2018 was signed in law, Public Law 115-123 (BBA), which included amendments to the Social Security Act (SSA) that create a permanent authorization for the RESEA program. The RESEA provisions are contained in Section 30206 of the BBA, enacting new Section 306 of the SSA. The recently enacted Section 306 of the Social

Security Act introduced several new program requirements including the requirement that states must submit an annual state plan to be considered eligible for funding. The specific requirements of the state plan are identified in Section 306(e) of the SSA (attached).

In addition to the statutorily required elements identified in Section 306(e) of the SSA, the ICR also includes routine administrative and logistical elements that have been identified by ETA as necessary for the grant review and approval process. All administratively required elements are listed in the first half of the state plan template and include Elements 1-17 and 20. Administrative elements include: general grantee contact information, the requested funding level, including proposed allocation among program and administrative expenses; information pertaining to required integration of the states' UI program and efforts to ensure participants' compliance with state UI requirements, identification of how participants are selected, integration the state's UI program into the RESEA program design, and the geographic locations where services are provided. Elements 18-19 and 21-22, including their subparts, are statutorily required by the Social Security Act and the state plan template includes appropriate citations for each element. Statutorily required elements include: a description of how the state provides proper notification that a claimant was selected for participation; an assurance and description of how the state provides reasonable scheduling accommodations to selected participants; assurances and descriptions of how the state will support RESEA's four statutorily defined purposes which include (1) improving participants' employment outcomes (2) strengthening UI program integrity, (3) providing alignment with the broader vision of the Workforce Innovations and Opportunity Act and (4) establishing RESEA as a gateway to other workforce system partner programs; and the state's activities that support RESEA's evidence-based standards and evaluation 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.

To be considered eligible for RESEA funding for a Fiscal Year, a state must submit a state plan that outlines how the state intends to conduct a program of reemployment services and eligibility assessments by responding to all the required elements identified in this proposed ICR. Complete plans that fully address the required elements and are submitted in timely manner will be approved by Secretary. Plans that fail to meet the required elements will be disapproved and the state will be notified of this disapproval within 30 days of the Department's receipt of the plan. This written notification will describe any portion(s) of the plan that was not approved and the reason for the disapproval(s) and provide the state with an opportunity to submit a revised plan.

Approved plans will be incorporated into each state's grant agreement and be used by the Department to support routine grant monitoring and the targeting of technical assistance. The Department will also analyze and summarize the information contained in the state plans to inform future budget requests and respond to requests from Congress, Office of the Inspector General, and other RESEA stakeholders. Portions of the state plans may also be made available to the public through publication on the Department's websites.

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.

This data reporting requirement uses automated procedures for data collection, transmission, and analysis that utilize state and Federal information processing technology. USDOL provides computers to each state and jurisdiction along with reporting software and a proprietary network to use to transmit data to the computers at the USDOL National Office.

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.

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

This 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.

Several requirements in Section 306 of the SSA require frequent oversight to ensure states are in compliance with the statute. Specifically, Section 306(c)(1) provides that “a State shall use such funds [RESEA grant funds] only for interventions demonstrated to reduce the number of weeks for which program participants receive unemployment compensation” and Section 306(d)(1) requires “any intervention without a high or moderate causal evidence rating…be under evaluation at the time of use.” There are also separate funding restrictions associated with each of these requirements.

Due to resource limitations, the Department will need to rely on the state plans to ensure compliance with Federal requirements. Collecting state plans less frequently than annually would not allow for adequate and timely monitoring or targeting of technical assistance.

Additionally, to support states in meeting the above requirements, the Department will maintain an inventory of evidence-based strategies and interventions that states may incorporate into their RESEA service-delivery design. The state plans will provide valuable information, including information about ongoing evaluations and participant data collected during the previous Fiscal year that will assist the Department in maintaining an inventory that reflects the most current information available.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the requirements of 5 CFR § 1320.5(c)(2)(i) through (viii):

- **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.**

This ICR implies no special circumstances.

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.

In accordance with the Paperwork Reduction Act of 1995, the public was given an opportunity to review and comment through a notice in the *Federal Register* on May 13, 2025 (90 FR 20316). All substantial comments were received in a single response from an individual that works in evidentiary evaluation services.

> *"I would like to respectfully suggest some revisions to the current data collection structure for RESEA state plans.*
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> *The first is to consolidate the intervention-specific reporting requirements currently found in Elements 9, 10, and 22 of the RESEA State Plan template. These elements each require states to provide detailed descriptions of RESEA activities in a table format, but can result in repetitive and sometimes conflicting information. In particular, 22c requests information by RESEA intervention while elements 9a, 10a, and 22i request information at the activity level (with several activities per intervention, potentially). By combining these elements into a single table that captures all necessary activity-specific data, the Department could reduce the time and effort required for states to complete the plan, minimize the risk of inconsistencies across elements, and improve the clarity of submitted plans.*
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> *The second is to modify the response options in element 22e of the state plan to remove the part that says "If 'Not Applicable' please advance to 22g". This way, states that are conducting whole-program RESEA evaluations or participating in RESEA evidence building efforts will still be directed to describe their efforts in 22f (instead of advancing to 22g). This will help the Department gain a clearer understanding of the full scope of state's plans to use grant funds to support evidence building."*

The comment suggested that the State Plan revise a series of elements in order to consolidate and reduce duplication of the data collection within the state plan. Additionally, the comment suggested modifying response options to certain elements to reduce confusion by the applicant. The state plan template was revised by removing the redundant charts as well as combining two charts into one table. The new table captures all the necessary activity-specific data needed to demonstrate the state plan is compliant with the regulations. And the new language added is to clarify the required information to reduce confusion for the state applicants.

Proposed Data Collection Requirement	Comment	Response
Assurances and a description of how the state's program will	The Information Collection Request (ICR) is necessary and would provide useful	The President Bipartisan Budget Act of 2018, Public Law 115-123 (BBA), which

satisfy the requirement to use evidence-based standards including: a description of the evidence-based interventions the State plans to use to speed reemployment; an explanation of how such interventions are appropriate to the population served; and, if applicable, a description of the evaluation structure the state plans to use for interventions that do not meet evidence-based standards; and	information as to how verbiage and method of delivery impact program outcomes. This ICR does not impose an undue burden on the grantees.	included amendments to the Social Security Act (SSA) that create a permanent authorization for the RESEA program. The RESEA provisions are contained in Section 30206 of the BBA, enacting new Section 306 of the SSA. The evaluation reporting element is statutorily required and taken verbatim from Section 306(e)(1)(c), SSA. Such that data provided to fulfill this requirement is to be sourced from routine RESEA reports (ETA 9128 and ETA 9129), WIOA data, or any evaluations that were conducted during the previous Fiscal Year and does not require a separate, independent, and potential duplicative data collection.

US DOL National Office consulted with three internal and external representatives to the agency involved in requesting review of the OMB RESEA State Plan Form. The consultation asked US DOL contacts for their feedback to reduce burden estimates for information collection activities associated with requesting an element of OMB RESEA State Plan Form. None of the three representatives had any changes or comments on the estimated burden, so US DOL 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
Marisol Lopez	US DOL Region 1	Lopez.Marisol@dol.gov
Megan Lizik	US DOL ASP	lizik.megan@dol.gov
Neil Ridley	US DOL ASP	Ridley.Neil.P@dol.gov
Leela Hebbar	Abt Global	Leela.Hebbar@abtglobal.com
Adam Travis	Abt Global	Adam.Travis@abtglobal.com

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

No payments and/or gifts are made to respondents.

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

There are no issues of confidentiality as no personal data on individual claimants is provided to ETA as part of this collection. ETA does not receive any data on individual claimants from states as a requirement of this data collection. Only aggregate data describing activity for all claimants are reported to ETA.

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 questions of a sensitive nature are included.

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.**

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
State Plan Development	53	1	53	40	2120	$53.00	$112,360.00

* Respondents defined as 50 states and the District of Columbia, Puerto Rico and the Virgin Islands.
**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.

During FY 2025, 49 states, and the District of Columbia, Puerto Rico, and the Virgin Islands operated a RESEA program and it is envisioned that eventually all 53 potentially eligible SWAs will participate. The Department estimates that it will receive 53 state plans annually and each response will take 40 hours to develop, finalize, and transmit. The Department estimates the annual time burden to be 2,120 hours and the monetized value of respondent time to be $112,360.00 based on an hourly rate of $53.00. The Department is making a series of changes to the state plan; however, we do not anticipate these changes increasing the time burden.

The burden estimate for this data collection is 40 hours which is unchanged from the 2022 ICR. ETA’s burden estimate is based on several factors. Between 2019 and 2021 the RESEA program underwent a phased implementation during which significant new program requirements were being introduced each year that required states apply new guidance and make significant updates to their annual state plans and the increased burden associated with program implementation was reflected in our earlier burden estimates. The phased implementation of the new RESEA requirements concluded in FY 2023 and we anticipate the continued normalization of RESEA operations will lead to greater efficiencies in program planning activities, including annual development of the RESEA state plan. Other revisions such as the new format, increased use of plain language, and including specific breakouts for commonly omitted information will also increase efficiency. Given the removal of redundant elements, improvements to the state plan template, normalization of RESEA operations, and expanded availability of state plan technical assistance resources that were developed since 2019, ETA projects that the burden associated with the revised state plan will be unchanged.

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 annualized costs to respondents.

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.

Based on program experience and on an assessment of average times spent reviewing similar plans, ETA estimates that, on average, 3 GS-12s based in the Washington, DC area will spend a total of 6 hours each, or 18 hours total, reviewing each plan. Pay for such an employee at the Step 4 level is $53.45 Providing a 38 percent allowance to cover fringe benefits and other costs, total per hour cost for each employee is $73.76 ($53.45 x 1.38 = $73.76); thus, the Federal cost of reviewing and processing each Plan is estimated to be $1,327.69. As noted previously, the Department estimates that it will receive 53 plans annually, resulting in a total annual cost of 70,367.04 for all 53 plans (53 plans x 18 hours x $73.76 = $70,367.04). Since plans are reviewed electronically, operational costs, including printing and support staff costs, do not apply.

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

In 2019, ETA developed this state plan data collection to closely align with the statutory annual report requirements detailed in section 306(3), SSA, and the essential administrative information necessary to complete the review, execution, and oversight of RESEA grants. ETA has identified data collection items to be revised and proposes to renew this data collection with several revisions intended to provide States a more cohesive grant application. The revised data collection includes several revisions intended to provide a reduction of burden and prevent technical clarifications, to make the plan elements clearer and reduce redundancy, to remove elements that are no longer routinely used to support grant management.

These proposed revisions include:

- Edits were made throughout the document to provide added technical clarity and to eliminate ambiguous responses and common data entry errors;
- Bullet point "checklist" items will be incorporated into plan elements to ensure narrative is complete;
- State assurance will be collected to confirm states have attached a copy of the notification letter template;
- Clarifying language will be added to plan items.

Due to the removal of redundant elements, improvements to the state plan template, normalization of RESEA operations, and expanded availability of state plan technical assistance resources that were developed since 2019, ETA projects that the burden associated with the revised state plan will be unchanged from the previous approved ICR due to increased efficiencies in RESEA planning activities.

A version of the form showing the tracked changes is included under "Documents for IC" in the submitted ICR.

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.

Decisions on publication of data have not been finalized.

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 expiration date for OMB approval will be displayed.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.