

PRA SUPPORTING STATEMENTS FOR REEMPLOYMENT AND ELIGIBILITY
ASSESSMENT (REA) REPORTS: OMB Control Number 1205-0456

A. Justification.

This is a justification for the Department of Labor's (DOL) request to extend the information collection by State Workforce Agencies (SWAs) on the Reemployment and Eligibility Assessments (REAs) they conduct. The Secretary's authority to implement this reporting requirement is found in the Social Security Act (SSA) section 303(a)(6), 42 U.S.C. 503 (a)(6), which requires that state law include provision for:

The making of such reports, in such form and containing such information, as the Secretary of Labor may from time to time require, and compliance with such provisions as the Secretary of Labor may from time to time find necessary to assure the correctness and verification of such reports.

The Secretary interprets section 303(a)(6), SSA, to authorize DOL to prescribe standard definitions, methods and procedures, and reporting requirements for the collection of information on benefit payment accuracy and the reemployment of UI benefit recipients and to ensure accuracy and verification of these data.

A-1. Reasons for Data Collection.

DOL uses this information: 1) to evaluate state performance in terms of service delivery; and 2) to report on the REAs, including the number of scheduled in-person reemployment and eligibility assessments, the number of individuals who failed to appear for scheduled assessments, actions taken as a result of individuals not appearing for an assessment (e.g., benefits terminated), results of assessments (e.g., referred to reemployment services, found in compliance with program requirements), estimated savings resulting from cessation of benefits, and estimated savings as a result of accelerated reemployment.

A-2. Users, Purposes, and Consequences of Failure to Collect the Information.

Data on REA workload counts and outcomes include counts of claimant participation, disqualifications, overpayments, reemployment service referrals, average duration of claimant benefits. ETA wants to foster unemployment insurance claimant linkages to One-Stop Career Centers so that claimants are afforded the opportunity to be familiar with and take advantage of the array of available reemployment services. Concurrently, SWAs are afforded the opportunity to assess the claimant's eligibility, develop a service plan appropriate for each individual claimant and to provide labor market information geared towards the individual needs of the claimant. States have broad authority to establish eligibility requirements that are appropriate for the labor markets they serve. The REA program has been established to promote thorough assessments of claimants' eligibility which continues to be challenging especially with the advent of telephone and Internet initial claims systems. Some studies have shown that often

claimants who are called into a One-Stop Career Center for services cease drawing benefits. The REA program provides the specific data required to monitor this premise and to address any policy changes needed to harmonize One-Stop Career Center services with clients' benefit eligibility.

A-3. Technology and Obstacles Affecting Reporting 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.](#)

A-4. Duplication.

There is no duplication.

A-5. Small Business.

This collection does not impact small businesses.

A- 6. Consequences of Less Frequent Data Collection.

Collecting this information less frequently would not allow for adequate monitoring changes or evaluation of the impact of the reemployment and eligibility assessments. Because state wage records are submitted quarterly and SWAs already report workload counts to ETA each month, collecting this data less frequently would not materially diminish the burden of this data collection initiative.

A-7. Special Circumstances Involved in Collection of Data. Some of the proposed data elements are currently collected by SWAs. The proposed data collection requires initial programming to produce the specified quarterly reports. This request contains no other special circumstances. The timing of the data collection allows for the submission of workload counts one year in advance of the submission of outcomes data.

A-8. Preclearance Notices and Responses.

DOL's preclearance notice was published in the *Federal Register* of December 4, 2008, (Volume 73, Number 243, pages 73957-73958). One state commented that the REA program was successful and they appreciated the opportunity to continue to participate. A second state commented that it needed additional time to complete the 9128, due to problems with their particular automated system. However, since funding for the required reports, automated systems, and other services delivered under this initiative is available in the states' annual Supplemental Budgetary Requests, the automated system issues will be resolved for that state. The state also requested that the Department provide expanded definitions of some of the data

elements which would clarify but not change any of these definitions. The Department concurs with this recommendation and will expand the definitions and request concurrence from the participating states to ensure that the expanded definitions improve data element clarity. Once these improvements are complete, ETA will submit them to OMB.

A-9. Payments to Respondents.

No payments are made to respondents.

A-10. Confidentiality.

ETA maintains strict controls over the data gathered through the UI reporting system. ETA is not be able to identify any individual claimant from this data collection. Only aggregate data will be reported to DOL.

A-11. Questions of a Sensitive Nature.

No questions of a sensitive nature are included.

A-12. Respondents' Burden and Cost of Collecting Information.

The total burden comprises SWA activities related to assembling automated record system files, conducting automated crossmatches of these files, and electronically reporting the results to DOL. Estimates of the burden follow, based on the fact that ETA awarded REA grants to states during fiscal year 2009, according to the availability of appropriated funds.

	ETA 9128 Report	ETA 9129 Report
Frequency:	Quarterly	Quarterly
Total Respondents:	18 State Workforce Agencies	18 State Workforce Agencies
Total Responses:	72 per year	72 per year
Estimated Time Per Response:	SWA staff - .25 hours	SWA staff - .25 hours
Total Burden Hours:	18 hours	18 hours

The cost of operating/maintaining these reports is estimated to be \$1,410 based upon an annual cost to 18 State Workforce Agencies with an hourly cost estimate of \$39.17.

A-13. Annual Cost to Respondents.

There are no annualized costs to respondents.

A-14. Annualized Federal Cost.

Federal costs are the staff required to receive and analyze the data. These costs are summarized as follows:

Program Office Staffing Costs	\$24,654 - total
Mathematical Statistician – 0.1 Staff year, GS-14	\$13,354
UI Program Specialist – 0.1 Staff year, GS-13	\$11,300

A-15. Reasons for Change in Burden.

The original submittal was made when the program was first begun and it was envisioned as something that eventually all 53 states and jurisdictions would participate in. However, the initial funding was inadequate for this. Over the last three years, the number of states participating has varied but has averaged around 20. Currently, the program has 18 states participating, so the changes in burden listed above better reflect the actual situation for the states required to submit administrative data under this collection.

16. Publication Information.

Decisions on publication of data have not been made.

17. Display of OMB Expiration Date.

The expiration date for OMB approval will be displayed.

18. Exceptions to the Certification Statement.

There are no exceptions to the certification statement.

B. This collection does not employ statistical methods.