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TO: STATE WORKFORCE AGENCIES
 STATE WORKFORCE ADMINISTRATORS
 STATE WORKFORCE LIAISONS
 STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
 STATE LABOR COMMISSIONERS
 STATE UNEMPLOYMENT INSURANCE DIRECTORS

FROM: JANE OATES /s/
 Assistant Secretary

SUBJECT: Oil Spill Reimbursement and Cost Documentation

1. Purpose. To provide guidance to states impacted by the oil spill in the Gulf of Mexico resulting from the explosion of the Deepwater Horizon offshore oil drilling platform regarding: 1) documentation and reimbursement for oil spill related activities; 2) identification of workers unemployed as a result of the oil spill; 3) reporting requirements related to oil spill activities; 4) confidentiality provisions that apply to information sharing between the state and the “responsible party” (RP) and/or the Gulf Coast Claims Facility (GCCF); and 5) information on the disposition of the reimbursed funds.

This guidance does not supplant current or future guidance from the Department of Justice (DOJ), agency, or state counsels’ office pertaining to documentation for cost recovery under the Oil Pollution Act (OPA).

2. References. The Oil Pollution Act of 1990 (Public Law (P.L.101-380); the Workforce Investment Act of 1998 (WIA) (P.L. 105-220); the Wagner-Peyser Act of 1933 as amended by WIA (W-P); the Federal Unemployment Tax Act (FUTA) (P.L. 76-379); the Social Security Act (SSA) of 1935 (P.L. 74-271); the Robert T. Stafford Disaster Relief and Emergency Assistance Act (P.L. 100-707) (Stafford Act); and Disaster Unemployment Assistance data collection (ETA 902, OMB Number 1205-0051), Office of Management and Budget Guidance, Identifying and Documenting Costs of “Government Activities Related to the BP Deepwater Horizon Oil Spill, M-10-29, July 1, 2010.

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3. Background. The April 20, 2010, explosion and sinking of the Deepwater Horizon offshore oil drilling platform in the Gulf of Mexico resulted in what is now considered the largest oil spill in United States history. The Deepwater Horizon was under lease to British Petroleum (BP). On April 29, 2010, the President declared this an “oil spill of national significance” under the OPA. The Federal government is committed to holding responsible parties accountable for all eligible costs associated with the BP Deepwater Horizon Oil Spill. To date, named responsible parties include BP, Transocean, MOEX, and Anadarko Petroleum Corporation. BP has acknowledged its responsibility for the oil spill, including reimbursement of states for unemployment compensation (UC) benefits, workforce services, and related administrative costs and has already provided some reimbursement to the State of Louisiana.

The Federal government is committed to the importance of identifying and documenting costs related to the Deepwater Horizon Oil Spill (Oil Spill). Guidance released by OMB on July 1, 2010 (M-10-29) stressed the importance of good record-keeping and cost documentation with respect to Oil Spill-related costs in order to promote appropriate stewardship and accounting of Federal funds, maintain accountability to taxpayers, and support current and prospective claims for reimbursement under the OPA and other laws. On October 5, 2010, OMB released follow-up guidance, calling on agencies to report the information that they have collected, in order to further these commitments. M-10-29 instructed agencies instructs agencies to continue close coordination with their State, local and tribal counterparts to implement this guidance and support them in their efforts to collect and track information. In communicating with its state counterparts, the Department of Labor has received repeated inquiries regarding unemployment and worker dislocation benefit programs.

The Employment and Training Administration (ETA) is committed to working with the states and BP to establish appropriate reimbursement processes for oil spill related unemployment benefits, workforce services, and associated administrative costs. **States are strongly encouraged to consult with the state’s legal counsel about all claims for reimbursement for oil spill related services and associated administrative costs.**

4. Reimbursement to Individuals and Businesses for Oil Spill Related Costs. As of August 23, 2010, BP, as a responsible party, transferred responsibility for accepting, reviewing, and paying claims for costs and damages incurred by individuals and businesses as a result of the oil spill to the Gulf Coast Claims Facility (GCCF). The GCCF is administered by Kenneth R. Feinberg, a neutral fund administrator responsible for all decisions relating to the administration and processing of claims by the GCCF.

All claims filed with BP before August 23, 2010, have been transferred to the GCCF for ongoing review and determination. For information on how to file claims through GCCF, go to <http://www.gulfcoastclaimsfacility.com/>.

While the Gulf oil spill has been declared an “oil spill of national significance,” it has not been declared by the President a major disaster under section 410 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act. Therefore, individuals unemployed as a result of the Gulf oil spill are not eligible for Disaster Unemployment Assistance (DUA).

5. Reimbursement to Governmental Entities for Oil Spill Related Costs.

BP has established a protocol for submission of government claims which can be found on their Website at:

<http://www.bp.com/sectiongenericarticle.do?categoryId=9034726&contentId=7064402>. The website also includes a Documentation Process Workbook, claims forms, and document checklists. Claims may be submitted by email, mail, phone, or fax.

Online: <http://www.piersystem.com/go/survey/2911/4375>
Email: governmentclaims@worleyco.com
Mail: Government Claims and Funding Requests
1905 W. Thomas Street
Suite D-358
Hammond, LA 70401
Phone: 1-877-710-4064
Fax: 11-877-810-5650

States are encouraged to file claims with BP for the increased costs of public services and/or benefits to individuals who are unemployed or who have lost self-employment income as a result of the oil spill and have been paid unemployment compensation (UC), or have received workforce services, and associated administrative costs.

6. Identification of Workers Unemployed as a Result of the Oil Spill. Currently there is no standard definition of what it means to be “unemployed as a result of the oil spill.” When determining whether an individual’s unemployment is a result of the oil spill for purposes of UC programs, the state should consider the following:

- A. The individual had been employed, in the case of the Deepwater Horizon oil spill, on the oil rig that exploded, causing the spill, and was laid off as a result;
- B. The individual had been employed within a local labor market where the oil is present on adjacent waterways or washing ashore and the employer either closed or laid off the individual due to a lack of work resulting from the impacts of the oil spill;
- C. The individual had been employed by an employer receiving income from business conducted in a local labor market where the oil is present on adjacent waterways or washing ashore and the employer either closed or laid off the individual due to a lack of work resulting from the impacts of the oil spill;
- D. The individual had been employed by an employer, regardless of location, receiving income or revenue from the business of processing products harvested from the Gulf of Mexico that either closed or laid off the individual due to lack of work resulting from the impacts of the oil spill.

Impacts resulting from the oil spill that may cause individuals to be unemployed include, but are not limited to, the following situations:

- The oil is directly interfering with the business activity, such as fishing or activities on the water or land where the oil is present, causing individuals to be laid off;

- Business or trade in impacted local labor markets has diminished as a result of the oil spill, causing individuals to be laid off or businesses to close;
- Business or trade for businesses earning their income or revenue, during the tax year prior to the oil spill, from processing products harvested from the Gulf of Mexico is diminished as a result of the oil spill, causing individuals to be laid off or businesses to close.

Industry sectors that may be impacted as a result of the oil spill include, but are not limited to:

- Fishing, seafood preparation and packaging, and fish and seafood wholesalers;
- Accommodation and food services, amusement parks, sightseeing tours, and gift shops;
- Retail operations: grocery, clothing, sporting goods stores, general merchandise, building materials, furniture, drug stores; and gasoline stations;
- Travel agencies, car rental, air transportation, and water transportation;
- Real estate, construction, building services, and waste and remediation services;
- Health care: physicians offices, emergency medical services, hospitals, pharmacies; and
- Banking.

7. Reimbursement for UC Costs.

A. UC Payments. ETA recommends that states track and seek reimbursement from the RP, in this case BP, for all state UC benefits paid to individuals whose unemployment is a result of the oil spill as well as associated administrative costs. Any reimbursements received from the RP for regular state unemployment compensation or the state share of Extended Benefits paid to an individual must, immediately upon receipt, be deposited in the state's account in the Federal Unemployment Trust Fund (UTF) in accordance with Section 3304(a)(3), Federal Unemployment Tax Act (FUTA). Section 3304(a)(3), FUTA, requires, as a condition for employers in a state to receive credit against the Federal tax, that:

all money received in the unemployment fund shall (except for refunds of sums erroneously paid into such fund and except for refunds paid in accordance with the provisions of section 3305(b)) immediately upon such receipt be paid over to the Secretary of the Treasury to the credit of the Unemployment Trust Fund established by section 904 of the Social Security Act ...

Section 303(a)(4), Social Security Act (SSA), similarly requires that funds received be deposited immediately into the state's UTF account as a condition of receiving administrative grants for the UC program.

DOL has long interpreted the phrase "received in the unemployment fund," as used in the immediate deposit requirement, to mean that all money received for purposes of the

unemployment fund is “in” the state's UTF account at the instant of its receipt by the state or its agent. This interpretation gives effect to the requirement that monies be transferred immediately to the UTF. Any other interpretation would defeat the purpose of establishing a trust, as the transfer of monies due the trust could be delayed indefinitely even though they are in the state's possession. Accordingly, because reimbursements for state regular compensation and the state share of EB are received for purposes of the state’s unemployment fund, they are “received in the unemployment fund.” As such, the state must immediately transfer the funds to the state’s UTF account.

- B. Unemployment Compensation Administrative Costs. ETA recommends that states also track and seek reimbursement from the RP, in this case BP, for the administrative costs associated with payment of UC benefits to individuals whose unemployment is a result of the oil spill. States should determine the administrative costs necessary to pay UC to oil spill impacted unemployed workers using generally accepted accounting procedures and Office of Management and Budget (OMB) Circular A-87, and seek reimbursement. To the extent a state workforce agency receives any reimbursement from BP (or other fund source) for Gulf oil spill administrative costs; the state should not seek duplicative reimbursement for these same administrative costs from the Federal government. Any reimbursement received by the state from BP (or other fund source) for UC administrative costs incurred for processing UC claims related to the Gulf oil spill must be deducted from the state’s above base entitlement request reported on the ETA-UI-3 Regular (State Quarterly Financial Report, OMB Control Number 1205-0132) in the quarter it is received. If administrative costs associated with Federally enacted emergency programs, such as Emergency Unemployment Compensation, are paid for by the RP, states should provide associated workload counts in the Comments Section of the UI-3. If Federal Additional Compensation (FAC) administrative costs are paid for by the RP, the FAC portion of the reimbursement should be noted in the Comments Section of the UI-3.
- C. Verification of Separation Information for Oil Spill Impacted Workers. State agencies must verify the reason(s) for separation for any UC claims filed by oil spill-impacted workers in the same manner as all other UC claims filed under the state UC law. States should verify and document whether a worker is unemployed as a result of the oil spill using the guidelines described in section 6 above (Definition of Worker Unemployed as a Result of the Oil Spill). At a minimum, in order to demonstrate that the separation is the result of the oil spill, states should require documentation from the separating employer that the separation was a result of the oil spill.
- D. Benefit Charges for Reimbursed UC Claims. All UC benefits paid as a result of the oil spill are to be charged to employers (or reimbursed by employers) in accordance with current state law. Employers may not be relieved of charges (or the requirement to reimburse the fund if a reimbursing employer) for benefits paid to individuals who are unemployed as a result of the oil spill unless the state law specifically provides for such relief from charges.

If the state is reimbursed by BP for the UC paid to individuals who are unemployed as a result of the oil spill, employers’ accounts may, if permitted by state law, be adjusted to remove the charges for any reimbursed benefits. The state must be able to identify the specific charges for the reimbursed benefits in order to remove the charges from an employer’s account as a result of the reimbursement by BP for those specific benefits.

The charges may not be removed until the reimbursed amounts are deposited in the state's account in the UTF.

- E. Confidentiality of UC Information. Section 303(a)(1) of the SSA provides that, for purposes of certification by the Secretary of Labor, state law must include provision for “[s]uch methods of administration ... as are found by the Secretary of Labor to be reasonably calculated to insure full payment of unemployment compensation when due;...”

ETA interprets Section 303(a)(1) of SSA to require states to maintain “the confidentiality of any UC information which reveals the name or any identifying particular about any individual or any past or present employer or employing unit, or which could foreseeably be combined with other publicly available information to reveal any such particulars ...” (See 20 CFR 603.4(b).)

While BP, as an RP, initially was responsible for payment of individual claims for lost wages or income, since August 23, 2010, the GCCF is managing individual claims. The GCCF seeks to avoid making a payment to an individual and then being charged for any UC paid to the individual for the period of time for which they received GCCF reimbursements. ETA is committed to working with the GCCF and states to develop processes for coordination of claims that are consistent with Federal confidentiality requirements for UC information. GCCF has incorporated a release of information clause in their claims form to enable disclosure of confidential UC information related to the individual's claim with GCCF.

States should note that nothing in 20 CFR Part 603 permits states to disclose to BP or to the GCCF the names or any other personally identifiable information concerning individuals who are unemployed as a result of the oil spill without a signed informed consent form meeting the criteria of § 603.5(d)(2).

Section 603.5(d)(2) permits states to disclose confidential UC information to a third party who is not an agent of the individual whose records are sought, but only under certain circumstances. Specifically, the third party, in this case BP or GCCF, must obtain a release, signed by the individual whose records are sought, containing a statement: 1) specifically identifying the information that is to be disclosed; 2) indicating that state government files may be accessed to obtain that information; 3) describing the specific purpose or purposes for which the information is sought, and a statement that the information obtained under the release will only be used for that specific purpose or purposes; and 4) indicating all the parties who may receive the information disclosed.

In addition, § 603.5(d)(ii)(A) requires that the purposes specified in the release must be limited to providing a service or benefit to the individual signing the release that such individual expects to receive upon signing the release.

- F. UC Reporting. To monitor the impact of the oil spill and properly manage the resulting financial accountability, it is necessary to collect related data as described below. Note, this is in addition to the current weekly oil spill related initial and continued weeks claimed data provided by county, and the summary data.

- 1) UC Financial Reporting. State agencies should provide the Employment and Training Administration's (ETA) Office of Unemployment Insurance documentation reflecting all

manner of reimbursement related to the payment of benefits received from the RP. Reimbursement for benefits paid must be reported on the ETA-2112 (UI Financial Transaction Summary, OMB No. 1205-0154) for the Clearing Account (Column D) as a deposit on line 28 and as a disbursement on line 48. Deposits to the UTF account must be reported on line 28 (Column E). Reimbursements for administrative costs must be reported in Section B on line 21, labeled “Advance,” of the ETA-UI-3 Regular report. This reimbursement will be deducted from the total dollar entitlement earned by the state. There will be no loss in funding to the state agency; the sum of the third party reimbursement (i.e., either BP or other fund source) and the resulting above base entitlement will equal what the state agency would have received for the quarterly above base entitlement absent the BP (or other fund source) reimbursement. Additional detail for amounts collected from the RP for Federally enacted emergency programs should be reported in the Comments Section of the UI-3 as described above.

- 2) UC Claims Reporting Requirements—Oil Spill Claims and Payment Activities. States will report oil spill related claims activity on a new report similar to the ETA 902 (Disaster Unemployment Assistance Activities, OMB Control Number 1205-0051). A facsimile of this report is included in Attachment A, and the actual report will soon be available through the reporting system states currently use to transmit UC required reports. Reporting definitions are unchanged from the current ETA 902. The report must be submitted for all months during which oil spill related claims began, and continue for 12 months past the last oil spill related initial claims reported. Reports should be submitted electronically through the current state reporting system
8. Workforce Investment Act (WIA) and Wagner-Peyser (W-P) Costs - State Responsibility in Seeking Reimbursement from BP and/or the OSLTF.

Funds allotted to states under WIA and W-P are available for states and local workforce investment areas to provide training and employment services to individuals unemployed as a result of the Gulf oil spill.

- A. Eligibility for WIA and W-P programs. Many, but not all, individuals affected by the oil spill may be determined dislocated workers, for the purpose of serving individuals with WIA Dislocated Worker funds or a National Emergency Grant (NEG). A state or local workforce investment area may use such funds for services only if the individual to be served meets the definition of dislocated worker at section 101(9)(A), (B), (C), or (D) of the WIA. The oil spill has caused several employers to layoff workers, and many workers will meet the definition of dislocated worker in 101(9)(B), which pertains to workers laid off in a permanent closure or substantial layoff.

In cases where an individual does not meet the definition of dislocated worker under 101(9)(B), the worker may in some instances meet the definition under 101(9)(A). ETA considers an individual as a dislocated worker if the individual meets the definition of dislocated worker at WIA section 101(9)(A), which includes a requirement that the individual is unlikely to return to a previous industry or occupation. Because ETA cannot determine when economic and environmental conditions will make it possible for businesses which have temporarily closed due to the oil spill to return to regular business, states and local areas may consider individuals who became unemployed due to the oil spill to be unlikely to be reemployed in the previous industry or occupation.

ETA considers a self-employed person a dislocated worker if the individual meets the definition of a dislocated worker at WIA section 101(9)(C), which includes a requirement that the individual be unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters. Because of its widespread economic impact, ETA considers the oil spill to meet the requirements of “general economic conditions” that have resulted in a self-employed individual’s unemployment, and ETA would consider a similar interpretation by a state or local area to be consistent with WIA.

Lastly, some workers may be considered dislocated workers under WIA 101(9)(D) when the individual had been dependent on the income of another family member but is no longer supported by that income and is having difficulty in obtaining or upgrading employment.

Though many oil spill-affected jobseekers will likely meet eligibility requirements for WIA Dislocated Worker, states may also serve oil spill-affected workers with W-P, or WIA Adult, Dislocated Worker, or Youth funds where individuals meet the eligibility requirements of those programs. All individuals are eligible for W-P services. To be eligible to receive WIA core services in the Adult program, an individual must be over 18, and the eligibility requirements for intensive and training services in the Adult program are described at 20 CFR 663.220 and 663.310. The eligibility requirements for WIA Youth services are described in the WIA regulations at 20 CFR 664.200.

- B. Reimbursable Costs. ETA recommends that states seek reimbursement for W-P and WIA costs related to serving individuals who are unemployed or who have lost self-employment income as a result of the Gulf oil spill, including associated administrative costs. These costs may include:

1) *Clean-up from the Gulf oil spill, including:*

- Individual Training Accounts (ITAs) under 20 CFR 663.400-440 that are used to train workers to clean up the Gulf oil spill, e.g. the basic 4 or 8-hour training required by Occupation Safety and Health Administration for anyone interacting with oil, and Hazardous Waste Operations and Emergency Response Standard training. See www.osha.gov/oilspills/index.html and Training and Employment Notice 43-09 “Jobseeker and Employment Services for Marine Oil Spill Response” for more information on these trainings.
- Training for oil spill cleanup provided through contracts as described at 20 CFR 663.430.
- Customized training, as described at 20 CFR 663.715, used to train workers to clean up the Gulf oil spill.
- Classroom-size training for oil spill cleanup provided through a contract to an institution of higher education or other eligible training provider in high-demand occupations, when such a contract does not limit customer choice, as authorized by the Department of Labor Appropriations Act, 2010, P.L. 111-117, Div. D. Tit. I.
- Needs-related payments and supportive services provided to enable individuals to participate in training.

- Time spent by One-Stop staff on staff-assisted WIA core and intensive services and staff-assisted W-P services related to the Gulf oil spill clean up, e.g. job search assistance, referrals to training for job openings related to clean up, referrals to job openings related to clean up, or screenings or assessments related to identifying appropriate workers for the Gulf oil spill response job openings.

2) *Mitigating damages from the oil spill, including:*

- ITAs used to prepare jobseekers for alternative employment after losing their job because of the Gulf oil spill, as well as needs-related payments and supportive services provided to enable individuals to participate in training.
- Customized training, as described at 20 CFR 663.715, used to train workers for alternative employment after losing their job because of the Gulf oil spill.
- Employer reimbursement for on-the-job training, as described at 20 CFR 663.700, used to train workers for alternative employment after losing their job because of the Gulf oil spill.
- Classroom-sized training provided through a contract to an institution of higher education or other eligible training provider in high-demand occupations, when such a contract does not limit customer choice, as authorized by the Department of Labor Appropriations Act, 2010, P.L. 111-117, Div. D. Tit. I., when such individuals have lost their job as a result of the Gulf oil spill.
- Time spent by One-Stop staff on staff-assisted WIA core and intensive services and staff-assisted W-P services related to the Gulf oil spill induced job loss, e.g. career counseling, assessment, case management, job search assistance, and relocation assistance to assist individuals find new employment.

3) *Administrative Costs.* ETA recommends that states seek reimbursement for unique, additional administrative costs borne by states and local workforce investment areas associated with serving individuals unemployed as a result of the Gulf oil spill such as the staff time necessary to document and bill BP for reimbursement. Generally the infrastructure costs associated with established One-Stops are not reimbursable. However, in limited situations it is appropriate for a state to request reimbursement for a mobile One-Stop van or trailer. In those situations, states should seek reimbursement for the portion of the operating costs directly related to responding to the needs of jobseekers affected by the Gulf oil spill, e.g. the costs of leases, employing a driver, and fuel.

ETA does not intend for the above discussion to suggest that One-Stops should limit services to only those individuals affected by the Gulf oil spill. This guidance relates only to seeking reimbursement for the Gulf oil spill related costs.

C. Documentation. States must maintain documentation supporting an individual's assertion that the individual's unemployment or loss of self-employment income was the result of the oil spill. The documentation may vary, depending on the individual's circumstances. Types of documentation may include documents verifying the individual was laid off from a business impacted by the oil spill as described in Section 6 above (Definition of Worker Unemployed as a Result of the Oil Spill) such

as pay stubs from the business, a lay-off slip, or a written statement by the employer. If an individual has lost self-employment income, documentation may include tax documents verifying the individual operated a business as described in Section 6 above, and a written statement by the individual that his/her business has ceased to operate. The examples of documentation provided above are not an exhaustive list.

- D. WIA/W-P Outcome and Performance Reporting. In order to ensure that the workforce system is responsive to the needs of workers affected by the Gulf oil spill, it is important for ETA to determine the number of individuals affected by the Gulf oil spill who received WIA and the W-P services from the workforce investment system. Likewise, it is equally important for ETA to know the characteristics, services, and eventual outcomes of the individuals affected by the Gulf oil spill who received services provided by the workforce investment system. Therefore, ETA requires that states collect information and report on individuals affected by the Gulf oil spill as they would on any other individual served under WIA or the W-P. States must modify their systems to support the collection of information for Gulf oil spill affected individuals. Further, states must identify the individuals affected by the Gulf oil spill who received WIA services in the WIA individual record (WIA Standardized Record Data or WIASRD) by using the appropriate identifier in field 313c. The appropriate code for each state is:

<u>STATE</u>	<u>CODE</u>
Alabama	OS01
Florida	OS02
Louisiana	OS03
Mississippi	OS04
Texas	OS05

For the W-P funded employment services, states only report aggregate numbers to ETA. States must include these Gulf oil spill-affected individuals in their ETA 9002 reports as part of the totals reported to ETA; ETA is not requiring a separate count of such individuals in these reports. ETA has also asked Gulf oil spill-affected states for participant data on a weekly basis to assess trends in the need for services, and plans to continue requesting these data.

- E. NEG Costs—State Responsibility in Seeking Reimbursement from BP and/or other fund source.

Although the oil spill is not considered to be a major disaster allowing for the payment of DUA, states may apply for a NEG to provide services to Gulf oil spill-impacted individuals that cannot reasonably be accommodated with the state's allotment of WIA Dislocated Worker formula funds. Several states, including Alabama, Florida, Louisiana and Mississippi, have received NEGs to provide services to individuals who are unemployed or lose self employment income as a result of the Gulf oil spill. As these NEGs were provided to the states for the sole purpose of assisting the states in the provision of services to oil spill-impacted individuals, the states should seek reimbursement from BP for any grant costs, as

discussed in the terms and conditions of the NEG award. Any reimbursements received must be treated as a refund to the grant, as discussed in this section.

- F. Disposition of Reimbursed WIA and W-P Monies. When the Grantee receives payment on its claims for reimbursement of grant costs from the RP and/or other fund source, the Grantee must treat these payments as a refund to the grant. The Grantee must use these refunds to reduce the costs of the grant in accordance with Generally Accepted Accounting Principles during the Grant Period. The Grantee must return all payments received after the end of the Grant Period to the Grantor in accordance with closeout requirements and 29 CFR 97.51(b).
9. OMB Approval. These instructions have been submitted to OMB as part of a non-substantive change to an existing collection (ETA 902, OMB Number 1205-0051) but have not yet been approved. Therefore, they should be considered draft instructions of a proposed data collection. ETA will notify states upon OMB approval and communicate any changes deemed necessary during the OMB approval process.
10. Action Requested. State administrators are requested to distribute this advisory to appropriate staff.
11. Inquiries. Questions should be addressed to the appropriate Regional Office.
12. Attachment. Attachment A-Proposed Data Collection For Gulf Oil Spill UC Template