SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL UNDER THE PAPERWORK REDUCTION ACT OF 1995

TABLE OF CONTENTS

SECTION **PAGE**

SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSIONS
LABOR CONDITION APPLICATION FOR H-1B, H-1B1, and E-3 NONIMMIGRANTS

A. Justification

A.1 Circumstances Necessitating Data Collection

The Employment and Training Administration (ETA) and the Employment Standards Administration (ESA) of the Department of Labor (DOL or Department) are responsible for administering the H-1B, H-1B1, and E-3 programs which provide for the filing and enforcement of labor condition applications by employers that seek to use aliens in specialty occupations and as fashion models of distinguished merit and ability.

Under the Immigration and Nationality Act (INA) an employer seeking to employ a foreign worker in a specialty occupation or as a fashion model of distinguished merit and ability on an H-1B, H-1B1, or E-3 visa is required to file a labor condition application with and receive certification from DOL as the first step in the visa process. The labor condition application process is administered by ETA; complaints and investigations regarding labor condition applications are the responsibility of the ESA. 8 U.S.C. 101(a)(15)(H)(I)(B), 1182(n) and (t), 1184(c).

A. Labor Condition Application (LCA) 20 CFR 655.700, 655.705, 655.720, 655.730, 655.731, 655.732, 655.733, 655.734, and 655.760

The process of protecting U.S. workers begins with a requirement that employers file a labor condition application (LCA) (Form (ETA 9035)) with the Department. In this application the employer is required to attest: (1) that it will pay foreign workers prevailing wages or actual wages whichever is greater -- including, pursuant to the American Competitiveness and Workforce Improvement Act of 1998 (ACWIA), the requirement to pay for certain nonproductive time and to provide benefits on the same basis as they are provided to U. S. workers; (2) that it will provide working conditions that will not adversely affect the working conditions of U.S. workers similarly employed; (3) that there is no strike or lockout at the place of employment; and (4) that it has publicly notified the bargaining representative or, if there is no bargaining representative, the employees, by posting at the place of employment or by electronic notification - and will provide copies of the LCA to each nonimmigrant employed under the LCA. In addition, the employer must provide the information required on the application about the number of foreign workers sought, occupational classification, wage rate, the prevailing wage rate and the source of the wage rate, and period of employment so that the Secretary of Labor can meet

her statutory obligations. Pursuant to the INA, additional recruitment and non-displacement requirements are applicable to H-1B dependent employers.

B. Documentation of Corporate Identity -- 20 CFR 655.760

Title 20 of the Code of Federal Regulations section 655.760 provides that a new LCA is not required merely because a corporate reorganization results in a change of corporate identity, regardless of whether there is a change in the EIN and regardless of whether the IRS definition of single employer is satisfied, provided that the successor entity, prior to the continued employment of the nonimmigrant, agrees to assume the predecessor entity's obligations and liabilities under the LCA. The agreement to comply with the LCA for the future and to any liability of the predecessor under the LCA must be documented with a sworn statement in the public access file.

C. Determination of H-1B Dependency -- 20 CFR 655.736

An H-1B employer must calculate the ratio between the number of H-1B workers it employs and the number of full-time equivalent employees (FTEs) to determine whether it meets the statutory definition of an H-1B dependent employer. (8 U.S.C. 1182(n)(3)(A)) All employers must keep copies of the I-129 petitions or requests for extension of status filed with the U.S. Citizenship and Immigration Service (USCIS). Additional documentation is required only in limited circumstances.

The regulations at 20 CFR § 655.736(c)(2) permit employers to use a snapshot test to determine if dependency status is readily apparent and requires a full computation only if the number of H-1B workers exceeds 15 percent of the total number of full-time workers of the employer. The employer must retain a copy of the full computation in specified circumstances that the Department believes will very rarely occur. The full computation must be maintained if the employer changes status from dependent to non-dependent. If the employer uses the Internal Revenue Code single employer test to determine dependency, it must maintain records documenting what entities are included in the single employer, as well as the computation performed, showing the number of workers employed by each entity that is included in the calculation. Finally, if the employer includes workers who do not appear on the payroll, a record of computation must be kept.

D. List of Exempt H-1B Employees in Public Access File -- 20 CFR 655.737 (e)(1)

Employers are required to include in their public access file a list of the H-1B nonimmigrants supported by any LCA attesting that it will be used only for exempt workers, or in the alternative, a statement that the employer employs only exempt H-1B workers.

E. Record of Assurance of Non-displacement of U.S Workers at Second Employers Worksite -- 20 CFR 655.738(e)

8 U.S.C 1182(n)(1)(F)(ii) generally prohibits an H-1B dependent employer from placing an H-1B nonimmigrant with another employer unless it has first inquired as to whether the other employer will displace a U.S. worker. The regulations require an employer seeking to place an H-1B nonimmigrant with another employer to secure and retain either a written assurance from the second employer, a contemporaneous written record of the second employer's oral statements regarding non-displacement, or a prohibition in the contract between the H-1B employer and the second employer.

F. Offers of Employment to Displaced U.S. Workers -- 20 CFR 655.738(e)

The INA at 8 U.S.C. 1182(n)(1)(E) prohibits H-1B dependent employers and willful violators from hiring an H-1B nonimmigrant if their doing so would displace a U.S. worker form an essentially equivalent job in the same area of employment. The regulations will require H-1B dependent employers to keep certain documentation with respect to each former worker in the same locality and same occupation as any H-1B worker, who left its employ 90 days before or after an employer's petition for an H-1B worker. For all such employees, the Department requires that covered H-1B employers maintain the name, last-known mailing address, occupational title and job description, and any documentation concerning the employee's experience and qualifications, and principal assignments. Further, the employer is required to keep all documents concerning the departure of such employees and the terms of any offers of similar employment to such U.S. workers and responses to those offers. These records are necessary for the Department to determine whether the H-1B employer has displaced similar U.S. workers with H-1B nonimmigrants and are already required, for the most part, by Equal Employment Opportunity Commission (EEOC) regulations.

DOL does not require employers to create any documents other than basic payroll information, with one noted exception. If the employer offers the U.S. worker another employment opportunity, and does not otherwise do so in writing, by the provisions of section 655.738(e)(1) of these regulations, the employer must document and retain the offer and the response to such an offer.

G. Documentation of U.S Worker Recruitment -- 20 CFR 655.739(i)

Pursuant to the INA at 8 U.S.C. 1182(n)(1)(G), H-1B dependents employers are required to make good faith efforts to recruit U.S. workers before hiring H-1B workers. Under the regulations, H-1B dependent employers will be required to retain documentation of the recruiting methods used, including the places and dates of the advertisements and postings or other recruitment method used, the content of the advertisements or postings, and the compensation terms. Further, the employer must retain documentation or a simple summary of the principal

recruitment methods used and the time frame of the recruitment in the public access file. In addition, the employer must retain any documentation concerning consideration of applications of U.S. workers, such as copies of applications and related documents, rating forms, job offers, etc. This documentation is necessary for the Department of Labor to determine whether the employer has made a good faith effort to recruit U.S. workers and for the public to be aware of the recruiting methods used. Retention of the records regarding consideration of applications from U.S. workers is already required by EEOC regulations.

With the exception of the list to be included in the public access file (and here to employers have the option of putting the actual records in the file), DOL is not requiring employers to create any documents, but rather to preserve those documents, which are created or received. The only additional recordkeeping burden required by these regulations is that the public disclosure files contain a summary of the principal recruitment methods used and the time frames in which they were used. Creating a memorandum to the file or the filing of pertinent documents may satisfy this recordkeeping requirement.

H. Documentation of Fringe Benefits -- 20 CFR 655.731(b)

Pursuant to the INA at 8 U.S.C. 1182(n)(2)(C)(viii), all employers of H-1B, H-1B1, and E-3 nonimmigrants are required to offer benefits to these workers on the same basis and under the same terms as offered to similarly employed U.S. workers. The regulations require employers to retain copies of all fringe benefit plans and any summary plan descriptions, including all rules regarding eligibility and benefits, evidence of what benefits are actually provided to individual workers and how costs are shared between employers and employees. The public access file must contain a summary of the benefits offered, which usually would be set forth in the employee handbook or summary plan description. If the employer is providing home country benefits, the public access file need only contain a notation to that effect. These records are necessary for the Department to determine whether the nonimmigrant is offered the same fringe benefits as similarly employed U.S. workers.

I. Wage Record keeping Requirements Applicable to Employers of H-1B Nonimmigrants -- 20 CFR 655.731

As part of the labor condition application, the employer attests that for the entire period of authorized employment of the H1-B, H-1B1, or E-3 nonimmigrants, the required wage rate will be paid to the nonimmigrants; that is, that the wage paid shall be the greater of the actual wage rate or the prevailing wage as defined in section 655.731(a) of the regulations.

Existing regulations require all H-1B, H-1B1, and E-3 employers to document their actual wage system to be applied to the nonimmigrants and U.S. workers. They are also required to keep payroll records for workers that are not exempt under the

Fair Labor Standards Act (FLSA), whether nonimmigrant workers or employees for the specific employment in question.

Employers are required to keep hours worked records for employees not paid on a salary basis and for part-time nonimmigrant workers, regardless of how paid. The only additional recordkeeping burden over and above those required by the FLSA, and approved under OMB Approval No. 1215-0017, are for keeping records of hours worked by part-time, salaried nonimmigrant workers who are exempt from FLSA.

J. H-1B Nonimmigrant Information Form (WH-4)

ACWIA amended the INA to require DOL to develop a procedure so that a person can provide information alleging H-1B program violations in writing on a form developed by DOL. 8 U.S.C. § 1182(n)(2)(G)(iii). Subsequent INA amendments applied the same requirement to the H-1B1, and E-3 visa programs, and DOL uses Form WH-4 to meet the statutory requirement. 8 U.S.C. § 1182(t)(3)(A).

A.2 How, by Whom, and For What Purpose the Information is to be Used

The INA provides that, unless the labor condition application is incomplete or appears obviously inaccurate on its face, the Secretary shall certify the application and return it to the employer within 7 working days. The INA further requires the Department to make available for public examination on a current basis a list (by employer and by occupational classification) of LCAs filed by employers. The records and information supporting the LCA attestations are reviewed by the WHD to determine employer compliance. The public access file is required by the INA so that the public has access to information to file complaints about violations.

Form WH-4 is an optional form any person may use to allege violations of the INA provisions enforced by the Wage and Hour Division (WHD) of the U.S. Department of Labor. WHD uses the information in deciding whether to commence an investigation of the employer.

A.3 Use of Technology to Reduce Burden

The Department now mandates all employers, except those with disabilities and prior approval, to utilize our LCA Online System which permits employers to fill out their LCAs via the Department of Labor website and submit them electronically to the Department's Employment and Training Administration (ETA). The electronic filing system is convenient and less burdensome for employers since, unlike the previous system based on filing applications by FAX or by mail, the new system allows the filing of an application without the submission of a hard copy, Since the scope of the Department's review of LCAs under section 212(n)(1)(G) and

212(t)(2)(C) of the INA is limited to completeness and obvious inaccuracies, the filing and processing of LCAs is particularly amenable to an electronic filing system.

The LCA form is available at (www.lca.doleta.gov) which can be accessed by employers to electronically fill out and submit the Form ETA 9035E. The website includes detailed instructions, prompts and checks to help employers fill out the 9035E. This process is designed to help insure that employers enter the H-1B, H-1B1, or E-3 program based on accurate LCA information and with explicit, immediate notice of the obligations.

Additionally, the Department's website provides an option to permit employers that frequently file LCAs to set up secure files within the ETA electronic filing system containing information which is common to any LCA they may wish to file. Under this option, each time an employer files an LCA, the information common to all its LCAs would be entered automatically by the electronic filing system and the employer would only have to enter the data that are specific to the new LCA it wishes to file in the instance at hand.

In compliance with the Government Paperwork Elimination Act (GPEA), WHD makes Form WH-4 available on the agency's Web site at http://www.dol.gov/esa/forms/whd/WH-4.pdf. The DOL has considered developing an automated complaint system and determined it would have a negative effect on the ability of WHD to provide quality, timely service to potential complainants and be impractical to implement.

As a general matter, the ability to screen complaints during the intake process is critical to effectively meeting the potential complainants' needs. Long experience has shown that well over half of the potential complainants contacting WHD complain of problems that the agency cannot resolve for a variety of reasons. Specifically with respect to this information collection, it is necessary that WHD be able to assure that complaints under the H-1B and related programs are within the agency's authority to investigate. For this purpose, WHD must determine if the complainant is an aggrieved party, and if so, whether there is reason to believe that a violation has occurred. If the complainant is not an aggrieved party, WHD must determine whether the person likely has knowledge of the employer's practices, whether the information submitted is credible, and whether there is reason to believe that the employer has committed a violation that meets the specific INA criteria. Complainants are not familiar with the nuances of the Act or with the specific requirements that must be satisfied; consequently, it is important that Form WH-4 be completed with the assistance of WHD staff, so the complainant provides the information necessary for WHD to determine whether the complaint can be investigated. Furthermore, if WHD staff speaks to the complainant before he or she completes Form WH-4, WHD will frequently be able to determine immediately that the matter that is the subject of the alleged complaint is not within the enforcement jurisdiction of WHD and the agency may make an appropriate referral. Otherwise, the public will submit information in many situations where the enforcement

program staff can provide no assistance. Allowing for electronic submission would create unnecessary burdens and would actually increase the total burden hours imposed on the public, as in many cases insufficient information would be provided, and WHD would then need to contact the complainant to obtain additional information, while in other cases information would be provided unnecessarily since WHD lacks jurisdiction or an actionable cause. It is poor customer service and inconsistent with GPEA principles to have the public waste its time by submitting insufficient information, or by submitting information on a matter about which the agency can take no action.

A.4 Efforts to Identify Duplication

The information required on the LCA is not available from any other source. The more efficient electronic processing will substantially reduce or eliminate the duplicate filings of LCAs by employers.

Many of the records required to be kept by the regulations are also required under the Fair Labor Standards Act, administered by WHD, and by the EEOC, Pension Welfare Benefits Administration and the Internal Revenue Service. In order not to duplicate burden, the Department accepts applicable records normally maintained for other purposes to document compliance during an investigation conducted under the H-1B and related programs.

A.5 Methods to Minimize Burden on Small Businesses

The burden on small business concerns is minimal.

A.6 Consequences of Less Frequent Data Collection

The Department would be in direct violation of law and regulations if this information was not collected.

A.7 Special Circumstances for Data Collection

There are no special circumstances that would require the information to be collected or kept in any manner other than those normally required under the Paperwork Reduction Act.

A.8 SUMMARY OF PUBLIC COMMENTS

In accordance with the Paperwork Reduction Act of 1995, these reporting

requirements will be published in the Federal Register to allow the public 60 days for review and comment. The summary of comments will be published after the 60 day comment period ends.

A.9 Payment of Gifts to Respondents

No payments or gifts are made to respondents.

A.10 Confidentiality Assurances

There are no assurances of confidentiality provided to respondents.

A.11 Additional Justification for Sensitive Questions

These information collections do not involved sensitive matters.

A.12 Estimates of the Burden of Data Collection

A. Labor Condition Applications -- 20 CFR 655.760

Employers submit LCAs when they wish to employ an H-1B nonimmigrant worker. Ninety nine percent of employers file LCAs using the online system. Based on program experience, ETA estimates that it will receive approximately 420,000 LCAs each year.

The regulations provide at section 655.760 that copies of the LCAs and its documentation are to be kept for a period of one year beyond the end of the period of employment specified on the LCA or one year from the date the LCA was withdrawn, except that if an enforcement action is commenced, these records must be kept until the enforcement procedure is completed as set forth in part 655, subpart I. The payroll records for the H-1B employees and other employees in the same occupational classification must be retained for a period of three years from the date(s) of the creation of the record(s), except that if an enforcement proceeding is commenced, all payroll records shall be retained until the enforcement proceeding is completed.

ETA estimates that the completion and submission of a LCA takes 35 minutes; complying with recordkeeping requirements takes 5 minutes; and posting the LCA in a conspicuous place and providing a copy to each H-1B nonimmigrant takes 5 minutes for a total of 45 minutes per application. The total burden for this item is estimated to be **315,000** hours.

B. Documentation of Corporate Identity -- 20 CFR 655.760

Prior to the continued employment of the H-1B nonimmigrant when there is a corporate change and the new corporation agrees to assume the predecessor entity's obligations and liabilities under the LCA, the agreement to comply with the LCA for the future and to any liability of the predecessor under the LCA must be documented with a sworn statement in the public access file.

It is estimated that 1,000 H-1B employers will be required to file the documentation annually and that the recording and filing of each such document will take approximately 30 minutes for a total annual burden of **500** recordkeeping hours.

C. Determination of H-1B Dependency -- 20 CFR 655.736

DOL estimates an average burden of 30 minutes, twice annually, for each employer that must document the dependency determination. The Department estimates that 200 employers will make this determination for an annual burden of 200 hours.

The Department also estimates that no more than 5 percent of the total estimated 70,000 H-1B employers will be required to retain copies of H-1B petitions and extensions who do not currently retain these documents, for an average of 3 minutes per petition for a total of 175 (3,500 X 3 minutes divided by 60). The total burden for this item is estimated to be **375** recordkeeping hours.

D. List of Exempt H-1B Employees in Public Access File -- 20 CFR 655.737(e)(1)

Employers are required to include in their public access file a list of the H-1B nonimmigrants supported by any LCA attesting that it will be used only for exempt workers, or in the alternative, a statement that the employer employs only exempt H-1B workers. DOL estimates that each list or statement will take approximately 15 minutes to prepare and that 1,600 H-1B employers will prepare one such list or statement annually for a total burden of **400** recordkeeping hours.

E. Record of Assurances of Non-displacement of U.S. Workers at Second Employer's Worksite

8 U.S.C. 1182(n)(1)(F). DOL estimates an average burden of 10 minutes per attestation or statement, and that 1,500 H-1B employers will document such assurance 5 times annually, for a total annual burden of **1,250** recordkeeping hours.

F. Offers of Employment to Displaced U.S. Workers -- 20 CFR 655.738(e)

It is estimated that 150 H-1B employers will make such offers of employment 5 times annually (750) and that 75 of those offers and responses would not otherwise be committed to writing without this paperwork requirement. Each such

documentation is estimated to take 30 minutes for a total annual burden of **37.5** recordkeeping hours.

G. Documentation of U.S. Worker Recruitment -- 20 CFR 655.739(i)

8 U.S.C. 1182(n)(2)(G)(ii). This recordkeeping requirement may be satisfied by creating a memorandum to the file or the filing of pertinent documents. It is estimated that 2,000 H-1B employers will file such documents or memoranda 5 times annually and that each recordkeeping will take 20 minutes, for an annual burden of approximately **3,333** recordkeeping hours.

H. Documentation of Fringe Benefits -- 20 CFR 655.731(b)

There are an estimated 10 percent of H-1B employers, or 7,000, that provide fringe benefits, such as bonuses, vacations and holidays, not required by ERISA regulations to be documented. It is estimated to document these plans would take 1.5 hours per employer, for an annual burden of 10,500 hours (7,000 employers X 1.5 hours). It is further estimated that 25 percent of H-1B employers (17,500) are multinational employers and that a note to the file that these workers receive home country benefits would take 30 minutes per employer for an annual burden of 8,750 hours. The total estimated burden for this item is **19,250** recordkeeping hours.

I. Wage Recordkeeping requirements Applicable to Employers of H-1B Nonimmigrants -- 20 CFR 655.731(b)

The additional burden of keeping records for salaried H-1B workers who are exempt from the FLSA is estimated at 2.5 hours per worker for 10,500 workers for a total annual burden of **26,250** recordkeeping hours.

J. Information Form Alleging H-1B Violations (WH-4)

Based on the actual number of Forms WH-4 filed during the past three fiscal year, it is estimated that 250 such responses will be received annually and that each response will take approximately 20 minutes, for a total burden of **83** reporting hours, rounded.

Burden hours are estimated based on workload data and program experience.

Reg. Cite	Activity/ Respondent	Frequency	Time per Respondent	Total Hours
20 CFR 655.760	420,000 applications	Annually	45 minutes	315,000 hours
	1,000 employers	Annually	30 minutes	500 hours
20 CFR 655.736	200 employers	Annually	1 hour	200 hours

	3,500 petitions	Annually	3 minutes	175 hours
20 CFR 655.737(e)(1)	1,600 employers	Annually	15 minutes	400 hours
8USC 1182(n)(1)(F)	1,500 employers	5 Times annually	10 minutes	1,250 hours
20 CFR 655.738(e)	150 employers	5 times annually	30 minutes	38 hours
20 CFR 655.739(i)	2,000 employers	5 times annually	20 minutes	3,333 hours
20 CFR 6557.731(b)	7,000 employers	Annually	1.5 hours	10,500 hours
	7,000 employers	Annually	30 minutes	8,750 hours
	10,500 records	On occasion	2.5 hours	26,250 hours
Filing of WH-4	200 responses	Annually	20 minutes	83 hours
TOTAL	420,000 applications			366,479 hours

TOTAL ANNUAL HOURS BURDEN FOR ALL INFORMATION COLLECTIONS – **366,479** HOURS

H-1B employers may be from a wide variety of industries. Salaries for employers and/or their employees who perform the reporting and recordkeeping functions required by this regulation may range from several hundred dollars to several hundred thousand dollars where the corporate executive office of a large company performs some or all of these functions themselves. Absent specific wage data regarding such employers and employees, respondent costs were estimated at $25 an hour. Total annual respondent hour costs for all information collections are estimated at $9,161,975 ($25.00 x 366,479)

Type of Collection	Hourly Burden	Cost Burden
Reporting	245,083	$6,127,075
Record Keeping	86,396	$2,159,900
Third Party Disclosure	35,000	$ 875,000

A.13 ESTIMATED COST TO RESPONDENTS

1. Start-up/capital costs: There are no start-up costs, as ETA provides a free, web-based data collection and reporting system to collect and maintain participant data.
2. Annual costs: There are no annual costs to respondents, as ETA is responsible for the annual maintenance costs for the free, web-based, data collection and reporting system.

A.14 Estimates of Annualized Costs to Federal Government

The average Federal Government cost for a year of operation, where salaries are involved, is estimated on an hourly basis multiplied by an index of 1.69 to account for employee benefits and proportional operating costs, otherwise known as Fully Loaded Full Time Equivalent (FLFTE). The index is derived by using the Bureau of Labor Statistics' index for salary plus benefits and the Department's internal analysis of overhead costs averaged over all employees of OFLC and WHD. The total cost to the Federal Government is estimated at $677,448, calculated as follows:

Network costs	
Line cost of $35,000 depreciated over 5 years on a yearly basis	$ 7,000
Equipment cost, e.g., routers, switches, of $100,000 depreciated over 5 years on a yearly basis	$20,000
Subtotal	$27,000
Equipment and Licensing	
Servers and software $500,000 depreciated over 5 years on an annual basis	$100,000
Contractor software and hardware support	$200,000
Software license upgrades	$ 25,000
Subtotal	$325,000
OFLC Staff Time	
Adjudication of 9035s not automatically certified [1,560 applications a year at 15 minutes per LCA Analyst (GS-12 Step2) $27.88 x 1.69]	$21,790
Subtotal	$ 21,790
IT Costs	
Costs to maintain the electronic system including staff and overhead	$300,000

Form WH-4

Printing - It is estimated estimate WHD will annually print approximately 250 Forms WH-4. (250 forms x $0.05).	$ 13
Mailing - of this number, WHD mails approximately 30 percent to complainants. The agency also provides a preaddressed, postage paid envelope for returning the completed Form WH-4 to the WHD. Mailing costs are estimated to be $75, rounded. [83 forms x ($0.42 postage + $.03 per envelope) X 2 directions]	$ 75
Staff - It is estimated a Wage-Hour Compliance Specialist needs about 15 minutes to analyze each form submitted by mail. [$36.36 (GS 13, Step 5) x 1.69 x .25 hours x 83 forms]	$ 1,275
It is further estimated WHD staff complete Form WH-4 about 70 percent of the time and each form takes approximately 20 minutes to complete and review. [167 forms x 20 minutes x $24.64(GS-11, Step 4) x 1.69]	$ 2,295
Subtotal	$ 3,658
Total annual cost	$677,448

A.15 Changes in Burden

The annual burden for these information collections has increased due to increased program usage of 100,000 ETA 9035E applications per annum.

During the past three fiscal years WHD has noticed an increase in the number of Forms WH-4 filed with the agency. The Department has correspondingly increased the estimates for the information collection.

A.16 Publication of Results

No collection of information will be published.

A.17 Approval Not to Display OMB Expiration Date

The Department will display the expiration date for OMB approval on the form and instructions or opening page of the website for electronic filing.

A.18 Exceptions to OMB Form 83-I

The Department is not seeking any exception to the certification requirements.

B. Collection of Information Employment Statistical Methods

There are no statistical methods employed.