

Dear Mr. Staniorski,

I am writing in support of the OMB Clearance for the QBS published in the Federal Register February 2, 2021.

I will address each of the posed questions.

☐ Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility.

I support the QBS as an essential part of the BLS mandate. The standard surveys conducted by BLS fill huge knowledge gaps for the economy. However, BLS's standard role does not allow for agile responses to new economic events or phenomena as the existing surveys are hard to change and changes can cause disruptions to the time series and other disruptions. The QBS will allow BLS to address new events and data needs quickly and repeatedly. These surveys will further our understanding of the US economy and impacts on workers.

Further, the Covid BRS provided a proof of concept for ongoing surveys of this type. The BRS data helped understand the impact of the pandemic on the economy. The responses will help researchers also link responses to the QCEW to study long-term impact and ongoing resurgence of individual businesses over time as we all climb out of the pandemic.

☐ Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used.

Conducting these QBS's will help BLS validate its burden estimates. Cognitive testing and pre-tests along with respondent feedback will let BLS know if the burden estimate is accurate.

☐ Enhance the quality, utility, and clarity of the information to be collected.

The QBS's will provide new information that can be linked to existing data elements in several BLS surveys and the QCEW to provide even further new insights.

☐ Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, *e.g.*, permitting electronic submissions of responses.

The QBS approach, using the QCEW/ARS existing framework will minimize costs and burden. By merely adding a few targeted questions at the end of the existing ARS will minimize BLS costs for solicitation and other survey functions. Given that the ARS is already mandatory in over half of the states will maximize response rates and reduce nonresponse follow up. Given that the ARS is primarily conducted via the Internet also ensures that collection costs are minimized.

I support this effort and hope that it will be expanded over time.

Richard Clayton

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*Title of Collection:* QCEW Business Supplement.

*OMB Number:* 1220–NEW.

*Type of Review:* New Collection. *Agency:* Bureau of Labor Statistics. *Affected Public:* Businesses or other for-profit institutions, not-for-profit institutions, and farms.

*Total Respondents:* 150,000. *Frequency:* One time.

*Total Responses:* 150,000. *Average Time per Response:* 10 minutes.

*Estimated Total Burden Hours:* 25,000 hours.