

May 6, 2025

U.S. Department of Labor
Employment and Training Administration, Office of Unemployment Insurance
Room S-4519
200 Constitution Ave. NW
Washington, DC 20210

Submitted via email: OUI-PRA@dol.gov:

Subject: Weekly Claims and Extended Benefits Data and Weekly Initial and Continued Weeks Claimed

OMB control number: 1205-0028

The National Employment Law Project (NELP) submits this comment in support of the continued collection of the Department of Labor's (DOL) Employment and Training Administration (ETA) Reports 538 and 539.

NELP is a nonprofit research, policy, and capacity building organization that for more than 50 years has sought to strengthen protections and build power for workers in the U.S., including workers who are unemployed. For decades, NELP has researched and advocated for policies that create good jobs, expand access to work, and strengthen protections and support for underpaid and jobless workers.

ETA Reports 538 and 539 are two vital economic indicators used by states, lawmakers, and advocates to follow unemployment trends. ETA 539 also provides important information about the start and end of state extended benefit periods.

ETA Report 538 is a preview of ETA Report 539. While not as in depth as ETA 539, it is advantageous because it provides information a mere five days after the corresponding week of data. Time is of the essence for stakeholders

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in responding to changes to unemployment claims. By comparison, ETA Report 539 provides a more fulsome picture and provides notice of the extended benefit periods in states.

Both reports provide states and stakeholders, including researchers, advocates, economic analysts, and lawmakers, with critical information on the number initial claims and continued weekly claims across an array of unemployment insurance programs. These data are important not merely for evaluating the number of new claims, but the number of continued claims, and the types of claims made. The reports allow stakeholders to compare claims data with prior years. The reports provide a national perspective to see how unemployment trends vary amongst the states. The reports also allow stakeholders to evaluate the number of workers covered by UI, which is an important metric with the continued growth of the gig economy.

Without ETA 538 and 539, stakeholders would be forced to operate without critical economic indicators. Thus, NELP strongly supports DOL-ETA's continued collection of this information.

Sincerely,

A handwritten signature in black ink, appearing to read "Flannery O'Rourke". The signature is fluid and cursive, with the first name being more prominent.

Flannery O'Rourke

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