

**JUSTIFICATION FOR
NON-SUBSTANTIVE CHANGE REQUEST FOR OMB CONTROL NO. 1205-0132**

**ETA 8623A: ET Handbook No. 336, 18th Edition;
Unemployment Insurance (UI) State Quality Service Plan (SQSP)**

BACKGROUND: The SQSP, with its State Plan Narrative, Corrective Action Plans (CAPs), and Integrity Action Plan (IAP), is the state's formal plan and schedule for improving performance. States use the State Plan Narrative to provide a general summary of the UI program in the state. Additionally, states are to include in the Narrative: 1) performance in comparison to the Government Performance Results Act (GPRA) goals; 2) results of customer satisfaction surveys (optional); and, 3) actions planned to correct deficiencies regarding UI programs and reporting requirements. Actions planned to correct deficiencies for Secretary Standards, Core Measures, and the Data Validation programs are to be addressed in CAPs. Actions planned to reduce and recover improper payments are to be addressed in the state's IAP. Operationally, the SQSP also serves as the programmatic plan portion of the grant document through which states receive Federal UI administrative funding. Therefore, states submit budget worksheets and various assurances annually.

PURPOSE OF THIS REQUEST: States have expressed that submitting the SQSP on an annual basis does not provide adequate time to plan and implement information technology solutions or to change business processes to improve performance. Therefore, to ensure a viable SQSP and improve the quality of the SQSPs, the Employment and Training Administration (ETA) proposes that states submit their formal SQSP, including the State Plan Narrative, CAPs, and the IAP, bi-annually. The biannual SQSP planning cycle will provide a 24-month window for states to adequately plan and implement their vision to enhance the UI program, and to reflect their commitment to performance excellence and client centered services. Though states will submit the programmatic portion of the SQSP bi-annually, they will continue to submit budget worksheets and various assurances annually since funds for UI operations are appropriated each year. The viability of the SQSP is critical to UI program performance. ETA believes that states will elevate performance improvement efforts by submitting the SQSP bi-annually.

ETA proposes to implement this change with the FY 2015 SQSP. States begin planning the FY 2015 SQSP in June 2014, to allow time for plan preparation, submittal, and approval of the SQSP by September 2014. Therefore, ETA is requesting this non-substantive change now to allow time for the completion of the process prior to the beginning of the FY.

ET Handbook No. 336, 18th Edition has been revised to reflect this change. Additionally, non-material changes has been made to the handbook

Changes to ET Handbook 336, 18th Edition:

Overall

- publication date changed to April 2014
- Change of the name of annual guidance from Call Memo to SQSP UIPL

Introduction

- Added language regarding the annual requirement
- Undated reference to UIPL 14-05
- Updated the Performance Measurement System to include Integrity measures

Chapter I

- Revised SQSP process to include change to biannual submittal of the formal SQSP which includes CAPs and Narrative
- Other non-material revisions for clarification
- Added description of UI Program Integrity Plan

Appendix I

- Revised CAP format to allow for 2-year planning
- Updated OMB expiration dates on forms

Appendix II

- Updated OMB expiration dates on forms

Appendix III

- Updated OMB expiration dates on forms

ACTION SOUGHT: ETA seeks OMB approval for a non-substantive change to its current information collection (OMB 1205-0132), specifically by minor changes throughout Handbook No. 336 to change the SQSP submittal process from an annual to a bi-annual process. The change to the submittal process will extend the duration of the SQSP to a two-year plan, thus reducing the burden incurred from an annual submittal of the State Plan Narrative, CAPs, and the IAP. Currently, the average estimated number of responses per 53 respondents is 848, with an average burden per response of 3.25 hours. The current total annualized burden is 2,756 hours.

Upon approval of this request, the burden under control number 1205-0132 will be an estimated average of 535 responses, 1,530 hours, and \$0 in other costs. The burden hour estimates are based on the experience of Federal staff with substantially similar work. The estimated burden hour allocation for this request is detailed as follows:

Report	Respondents (State)	Reporting Frequency	Reports per Year	Total Responses	Hours per Response	Total Hours
UI-1 (base), ETA 8623A	53	annual	1	53	1	53
UI-3 (contingency), ETA 2208A (Quarterly)	53	quarterly	4	212	2	424
CAPs	27	biannual	8*	216	4	864
UI Program Integrity Plan	27	biannual	1*	27	3	81
State Plan Narrative	27	biannual	1*	27	4	108
Total		Various	15	535		1,530

*For burden estimation purposes each CAP, UI Program Integrity Plan, and State Plan Narrative is considered to be a different report even though they are submitted simultaneously. While CAPs are submitted on a biannual basis, a State may need to submit multiple plans to address various deficiencies.

Summary

Frequency: Various.

Total Respondents: 53 SWAs

Estimated Number of Annual Responses: 535.

Estimated Number of Annual Burden Hours: 1,530.

Estimated Value of Burden Hours: \$66,141.90. This estimate is based upon 1,530 total annual hours multiplied by the average hourly rate for state agency personnel of \$43.23.

There is no other annual cost burden

REASONS FOR BURDEN CHANGE

Changing the formal SQSP submittal from an annual to a biannual process will minimize the burden of the collection of information by reducing the average estimated total responses by 313 and 1,226 hours, because CAPs, the UI IAP, and the State Plan Narrative will be submitted on a bi-annual basis.